



Draft Dacorum Strategic Design Guide Supplementary Planning Document Consultation Report of Responses

January 2021

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1 Introduction: Draft Dacorum Strategic Design Guide Supplementary Planning Document Consultation

- 1.1 The purpose of the Draft Dacorum Strategic Design Guide Supplementary Planning Document (SPD) is to improve the quality of the design of new homes, estates and employment use buildings in the borough. It outlines Dacorum's design expectations for high quality, inclusive and sustainable places that reflect and respond to Dacorum's local character, and a three-stage design process to achieve these. The Guide sets out strategic design principles for developers to follow when preparing their plans for new development, which are to be applied across sites of all scales and which should underpin design at all stages - from site-wide masterplanning to the design of blocks, buildings and streets. A separate section focuses on employment use buildings, such as offices and industrial units. The approach aims to create distinctive, attractive and successful places to live and work that are adaptable for the future.
- 1.2 The consultation sought views and opinion on:
- the key characteristics of Dacorum and Hertfordshire;
 - the design principles;
 - the design guidance for employment buildings and areas.
- 1.3 The public consultation on the Draft Dacorum Strategic Design Guide SPD took place for period of over 6 weeks from 3rd July to the 16th August 2020. This is two weeks longer than the time period stipulated in the Statement of Community involvement (SCI), and gave residents additional time to engage in the process as the consultation took place partly over the school summer holiday and while COVID-19 restrictions were in place. (The first national COVID-19 lockdown ended on 4th July when the Health Protection (Coronavirus, Restrictions) (No. 2) (England) Regulations 2020 came into force).
- 1.4 The full consultation document can be found here:
[https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-\(spds\)](https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/supplementary-planning-documents-(spds))

2 Making representations

- 2.1 Feedback on the Draft Dacorum Strategic Design Guide SPD was invited in a range of formats:
- The Council's consultation portal hosted the Draft Dacorum Strategic Design Guide SPD (set out in three parts) and the accompanying comments form, which explained which part of the document each of the four questions related to. Access to the consultation was via a hyperlink on the DBC Current Consultation and Strategic Planning web-pages. The notification email included a link to the consultation portal and Strategic Planning web-page.

These links were also included in the postal notifications and the Public Notice printed in the Hemel Hempstead Gazette newspaper and Online Hemel Today. The comments form on the portal provided the option of answering yes or no to the questions with the opportunity to provide detailed comments on every question. In addition a further opportunity to add more comments was available on question 4.

- A downloadable version of the comments form which could be completed and returned electronically or be printed and returned by mail or email (Appendix 3).
- By email
- By letter

3 Publicity

- 3.1 The Draft Dacorum Strategic Design Guide SPD consultation was carried out in accordance with the minimum requirements set out in the Council's adopted Statement of Community Involvement (SCI).
- 3.2 The consultation was publicised in the bi-annual printed and monthly electronic versions of Dacorum Digest, the Council's primary documents for communicating with local residents and businesses.
- 3.3 The six week consultation was advertised in the local press on 1st July 2020.

4 Notification

- 4.1 The Draft Dacorum Strategic Design Guide SPD consultation was carried out in accordance with the minimum requirements set out in the Council's adopted SCI.
- 4.2 The Council sent a notification email to all Town and Parish Councils in Dacorum to inform them that the consultation on the Draft Dacorum Strategic Design Guide SPD was taking place. All Dacorum Borough Council elected members and Hertfordshire County Council elected members for the Dacorum Borough area were also informed of the consultation by email.
- 4.3 Statutory consultees were notified of the consultation by email or post. Notifications were sent to all contacts (including, but not limited to, individuals, businesses, interest groups and resident organisations) held on the Council's Strategic Planning Consultation Database (comprising contacts who have previously registered an interest in Dacorum's local plan and associated documents) either by email or by postal letter where no email address was recorded. Data on the number and type of notifications sent can be found in Appendix 1.

- 4.4 Example copies of each type of notification sent are included in Appendix 2, alongside publicity notices.

5 Public inspection of documents

- 5.1 Government guidance during this period (Coronavirus (COVID-19) Planning Update published on 13 May 2020 and Written Ministerial Statement) encouraged planning authorities to continue with their services as normally as possible and to use virtual platforms and digital media to enable the planning system to function.
- 5.2 Throughout the period of the consultation deposit points were not open for general public access. In order to provide a public inspection of the documents, members of the public were able to make arrangements to view a copy at the Forum, the Borough Council office in Hemel Hempstead. This was advertised via the public notice, on the notification email and letters, and via the Council website.

6 Overview of Responses

Level of Response

- 6.1 The Draft Dacorum Strategic Design Guide SPD consultation comments form contained four questions, there were a total of 61 responses from 59 consultees.

Method of Response

- 6.2 Responses were made in a number of ways – some consultees directly responded into our consultation portal, other responses were received as letters, or completed comments forms were returned in the post, or by email.

What you told us

High Level Overview

- 6.3 From the consultation responses it is possible to identify some common themes which have been set out below. It is important to note that the following section does not in any way indicate a ranking of issues. Furthermore, if an issue is not listed below it should not be interpreted that the Council has dismissed it from consideration. The detailed responses are summarised and discussed in Appendix 4.

Theme:

Climate Change - Respondents thought climate change was an important matter for the Draft Dacorum Strategic Design Guide SPD with comments submitted on how

this was addressed. Some thought the energy standards used were too high and the low carbon energy generation design principles unrealistic. Others thought that they were not ambitious enough and that microgeneration technology was needed on all new-homes. Concerns were also raised at how adverse weather will impact natural resources such as trees and the Borough's chalk streams.

Officer Comment:

The Draft Dacorum Strategic Design Guide SPD reflects standards and requirements that will be introduced through the new Dacorum Local Plan and takes into account the Council's approach to climate change and emerging national guidance. The standards and requirements within the new Dacorum Local Plan will be viability tested through its preparation. More specialist guidance will be developed on climate change as needed.

Theme:

A number of respondents raised concern about the length of the document and also that the complexity of the language used may make it difficult for people without a technical background in housing, planning or development to access.

Officer Comment:

The Draft Dacorum Strategic Design Guide SPD requires an appropriate level of technical information for developers and officers to follow as part of the planning application process to ensure standards are met. Officers will consider further how its navigation and use can be made more accessible.

Theme:

COVID-19 - Respondents noted that COVID-19 is not mentioned in the Draft Dacorum Strategic Design Guide SPD and asked if its impact had been considered and whether the document should be updated to take into account future needs and the design of employment areas, workspace and homes.

Officer Comment:

The full impact of COVID-19 will not be known for sometime. The Draft Dacorum Strategic Design Guide SPD encourages flexibility in design to enable development to adapt to changing work patterns and lifestyles, such as home working and workspace within neighbourhood centres. It also sets principles for access to the natural environment and amenity facilities for health and wellbeing.

Theme:

Transport – Several respondents thought more emphasis should be given to walking and cycling routes both during the design process and in the design principles, and that these should be priority transport routes within new development and connect to wider networks beyond (if possible on land beyond the developers control).

Alongside this was a desire to reduce reliance on private cars and encourage the use of electric vehicles through more charging points.

Officer comment:

The design process and principles will be amended to give more prominence to walking and cycling and to improve sustainable transport connectivity. The standards for the provision of electric vehicle charging points are set out in the Council's Parking Standards SPD.

7 Detailed Analysis

7.1 The responses received were individually reviewed and collated within summary tables that were produced for each question. This detailed analysis can be found in Appendix 4 and includes common themes raised by multiple respondents. Where several members of the public gave a similar response, this was summarised and included once within the table. Responses from a specific group or statutory consultee were summarised individually, irrespective of whether similar comments had been received and previously noted.

7.2 An officer response has been provided against each issue raised. This also identifies where the Draft Dacorum Strategic Design Guide SPD has been revised as a result of the consultation comments received.

7.3 The summary tables for each question are organised as follows

For responses supporting the question

- Number of responses submitted and the percentage of respondents supporting and not supporting the question (if applicable)
- Table summary of responses from statutory consultees, identified organisations and members of the public alongside an officer response
- List of statutory consultees supporting the question
- List of other groups supporting the question

For responses not supporting the question

- Number of responses submitted and the percentage of respondents supporting and not supporting the question (if applicable)
- Table summary of responses from statutory consultees, identified organisations and members of the public alongside an officer response
- List of statutory consultees not supporting the question
- List of other groups not supporting the question

7.4 In addition to the summary tables, Appendix 5 contains the full text each respondent submitted for each question answered.

8 Next Steps

- 8.1 The detailed responses below in Appendix 4 set out the actions that will be taken in response to individual comments, points and issues.
- 8.2 This Report of Responses to the consultation and the updated Draft Dacorum Strategic Design Guide SPD will be reported to the Council's Cabinet committee for approval to adopt and the adoption (regulation 14) procedure will be completed in accordance with the Statement of Community Involvement.

9 Report List of Abbreviations

DBC	Dacorum Borough Council
SCI	Statement of Community Involvement
SPD	Supplementary Planning Document

Appendix 1

Appendix 1 – Number and type of notifications issued

Total consultation notifications issued:

- 8064

Method of notification:

- Email 5750
- Postal letters 2314

Notifications were sent to the four consultee categories listed in the SCI that are registered on the Council's Strategic Planning Consultation Database as follows:

- Statutory / Specific Consultees
- General Consultees
- Other Consultees
- Wider Community Consultees

In addition courtesy emails to inform the recipients that the consultation was taking place were sent to the following:

- Dacorum Borough Council's elected members
- Hertfordshire County Council elected members for the Dacorum Borough area
- The Council's senior management team and other selected officers

Appendix 2

Appendix 2

1) Hemel Hempstead Gazette Newspaper Consultation Public Notice

WEDNESDAY, JULY 1, 2020 £1.10p (20% off if you subscribe) facebook.com/HemelHempsteadGazette @TheGazette_News www.hemeltoday.co.uk

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Let the news come to you

Six weeks' FREE delivery of the Gazette – see page 21

New hope for hospital bid

MP says lack of money no longer an excuse not to back new site option
Health trust says intention is to find the best solution
Full story – see page 3

Housekeeper pocketed thousands from elderly

A housekeeper from Hemel Hempstead has been sentenced after pocketing thousands of pounds from elderly victims. **PAGE 5**

County council facing £17m shortfall

A £17million shortfall is being faced by Hertfordshire County Council due to coronavirus—although some reserves may be in place to absorb some of the impact. **PAGE 8**

Raising domestic abuse awareness

Herts Domestic Abuse Helpline is raising awareness of the impact coronavirus lockdown is having on domestic abuse. **PAGE 9**

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PUBLIC NOTICES

Draft Dacorum Strategic Design Guide Supplementary Planning Document Notice of Public Consultation

This notice is provided in accordance with Regulations 12 and 13 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012

What is the consultation about?
Dacorum Borough Council is preparing new Design Guidance for development within the Borough. The first stage of this process is the Draft Dacorum Strategic Design Guide Supplementary Planning Document (SPD) which outlines the Council's design expectations for high quality, inclusive and sustainable places which reflect and respond to Dacorum's local character, and a three-stage design process to achieve these. It also provides detailed guidance for the design of commercial areas, and business and industrial units, to meet best practice. Once adopted the Dacorum Strategic Design Guide SPD will be a material consideration in determining planning applications.

How can I comment and where are the documents available?
The Council is inviting comments on the Draft Dacorum Strategic Design Guide SPD, between 5pm on the 2nd July and 11.59pm on the 16th August 2020.

All information and documents relating to the consultation is available:

- https://consult.dacorum.gov.uk/portal/planning/psd/sdg_spd/sdg_spd; and
- on the Council's website www.dacorum.gov.uk/single-local-plan-evidence-base.

Dacorum Borough Council offices are currently closed to the public due to COVID-19. A copy of the document can be made available to view on request, please contact strategic.planning@dacorum.gov.uk or call (01442) 228660 to make arrangements.

How can I comment?
Comments must be received in writing by **11:59pm on Sunday 16th August 2020**.

You are invited to submit your comments electronically:

- using the Council's consultation portal https://consult.dacorum.gov.uk/portal/planning/psd/sdg_spd/sdg_spd; or
- by email to responses@dacorum.gov.uk using the comments form provided on our website www.dacorum.gov.uk/single-local-plan-evidence-base.

Alternatively you may submit your comments by post, addressed to: Strategic Planning and Regeneration Team, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN.

Any comments received cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

Further information
Please contact the Strategic Planning and Regeneration Team if you have any questions or require more information:
 Email: strategic.planning@dacorum.gov.uk
 Phone: 01442 228660
 Address: Strategic Planning and Regeneration Team, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN.

TOWN AND COUNTRY PLANNING ACT 1990 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

Planning (Listed Buildings and Conservation Areas) Regulations 1990 Town and Country Planning (Development Plans and Consultation) (Departures) Direction 1999

PUBLIC NOTICE OF APPLICATIONS

The following applications have been made to Dacorum Borough Council. The object of this publicity is to draw attention to the submission of new applications, and is not intended fully to describe the details or give further publicity to amended applications. You may wish to monitor the progress of the application and/or comment on an application. You can do this by searching for the relevant reference number on the Council's website: <https://planning.dacorum.gov.uk/publicaccess/>.

20/01523/FHA Application is in a conservation area. Cloverleaf Chapel Croft Chipperfield Kings Langley Herts WD4 9DR Single storey rear, two storey side extension, rear balcony (amended scheme)

20/01555/LBC Application affects a listed building and conservation area. Shepherds Cottage Frithsdon Lane Frithsdon Hemel Hempstead Herts HP1 3DD Minor internal and external renovation works

20/01553/LBC Application is for works to a listed building. 2 Woodend Cottages Little Woodend Markyate St Albans Herts AL3 8AX Proposed Extension and Alterations

20/01537/FHA Application is in a conservation area. 3 Boxwell Road Berkhamsted Herts HP4 3EX Demolition of existing single storey glazed extension

20/01370/MFA Application is for a major development. Bank Mill Berkhamsted Herts Construction of 16 apartments with landscaping

20/01404/FHA Affecting the setting of listed building Application is in a conservation area. 10 Ringshall Road Ringshall Berkhamsted Herts HP4 1ND Wooden Summer House

20/01413/FUL Application affects a listed building and conservation area. 29 High Street Hemel Hempstead Herts HP1 3AA Proposed rear spiral stair

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Or post to:
Simon Snow, Piccadilly Greetings Group Ltd, 4, Horizon Point, Swallowdale Lane, Hemel Hempstead, Hertfordshire, HP2 7FZ

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Call 0333 344 7473 or visit instaprotect.co.uk

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2) Consultee notification letter – postal

Date: 3rd July 2020
Your Ref.
Our Ref: DSDG SPD Consultation
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Directline: 01442 228660



The Forum
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1DN

Telephone: 01442 228000
www.dacorum.gov.uk
DX 8804 Hemel Hempstead
D/deaf callers, Text Relay:
18001 + 01442 228000

ADDRESS

Dear

CONSULTATION ON THE NEW DRAFT DACORUM STRATEGIC DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT

What is this consultation about?

Dacorum Borough Council is preparing new Design Guidance for development within the Borough. The first stage of this process is the 'Draft Dacorum Strategic Design Guide Supplementary Planning Document (SPD)' which outlines the Council's design expectations for high quality, inclusive and sustainable places that reflect and respond to Dacorum's local character.

It also provides detailed guidance for the design of commercial areas, and business and industrial units, to meet best practice.

Once adopted the Dacorum Strategic Design Guide SPD will be a material consideration in determining planning applications.

How can I comment and where is the document available?

The consultation begins at 5pm on Friday 3rd July 2020 and closes at 11:59pm on Sunday 16th August 2020.

All information and documents relating to the consultation is available:

- via the Council's consultation portal
https://consult.dacorum.gov.uk/portal/planning/lp/sdg_spd/sdg_spd;

Please note: your username to access the portal and make comments is



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If you've forgotten your password, please go to <https://dacorumconsult.objective.co.uk/common/forgottenPassword.jsp>;

- on the Council's website www.dacorum.gov.uk/single-local-plan-evidence-base.

Please note Dacorum Borough Council offices are currently closed to the public due to COVID-19. A copy of the document can be made available to view on request, please contact strategic.planning@dacorum.gov.uk or call (01442) 228660 to make arrangements.

How can I find out more?

Please contact the Strategic Planning and Regeneration team if you have any questions or require further information:

Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228660

Address: Strategic Planning and Regeneration Team, Dacorum Borough Council,
The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alex Robinson', with a long horizontal flourish extending to the right.

Alex Robinson
Strategic Planning Manager
Dacorum Borough Council

3) Consultation portal consultee notification – agent/client

Date: 3rd July 2020
Your Ref.
Our Ref: DSDG SPD Consultation
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Directline: 01442 228660



The Forum
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1DN

Telephone: 01442 228000
www.dacorum.gov.uk
DX 8804 Hemel Hempstead
D/deaf callers, Text Relay:
18001 + 01442 228000

ADDRESS

Dear

CONSULTATION ON THE NEW DRAFT DACORUM STRATEGIC DESIGN GUIDE SUPPLEMENTARY PLANNING DOCUMENT

Re your client - «Consultee_Full_Name»

What is this consultation about?

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https://consult.dacorum.gov.uk/portal/planning/lp/sdg_spd/sdg_spd;
Please note: your username to access the portal and make comments is



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<https://dacorumconsult.objective.co.uk/common/forgottenPassword.jsp>

- on the Council's website www.dacorum.gov.uk/single-local-plan-evidence-base.

Please note, Dacorum Borough Council offices are currently closed to the public due to COVID-19. A copy of the document can be made available to view on request, please contact strategic.planning@dacorum.gov.uk or call (01442) 228660 to make arrangements.

How can I find out more?

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Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228660

Address: Strategic Planning and Regeneration Team, Dacorum Borough Council,
The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alex Robinson', with a long horizontal stroke extending to the right.

Alex Robinson
Strategic Planning Manager
Dacorum Borough Council

4) Consultation portal consultee notification email

[12/11 3:46 PM]

Dear

DACORUM LOCAL PLAN (2020-2038) EMERGING STRATEGY FOR GROWTH - CONSULTATION

What is this consultation about?

Dacorum Borough Council is consulting on the Emerging Strategy for Growth. This is the next stage of preparing the new Dacorum Local Plan 2020-2038. It will be a key document in shaping the future of our Borough. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations DPDs and the 'saved' policies from the 2004 Local Plan

Other supporting documents and evidence are also available, including a Sustainability Appraisal.

When can I comment and where are the documents available?

The Council is inviting comments on the Emerging Strategy for Growth document, between **5:00pm on Friday 27th November 2020 and 11:59pm Sunday 7th February 2021.**

All information and documents relating to the consultation is available:

- via the Council's consultation portal <https://consult.dacorum.gov.uk/kse/event/35755>
- on the Council's website <http://www.dacorum.gov.uk/localplan>

The Emerging Strategy for Growth is also available as a hard copy:

Information on locations and opening hours can be found here:

<https://www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx>

- To loan from:
 - Hemel Hempstead Library
 - Berkhamsted Library
 - Tring Library
- To view at:
 - The Forum in Hemel Hempstead on an **appointment only basis** Please contact the Strategic Planning team to make arrangements (see 'How can I find out more' below).

How can I visit the virtual exhibition?

There will be a virtual exhibition open throughout the consultation managed by representatives of the Council. This can be found at <https://dacorumlocalplan.consultation.ai/>

As a part of this you will be able to ask questions via the 'leave a message' function. Please note any comments made via 'leave a message' will not be considered as official responses to the consultation and will not be made public.

How can I find out more?

Please contact the Strategic Planning team if you have any questions or require further information:

Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228660 - **Due to COVID-19 you may experience longer wait times than normal when calling, please email if at all possible**

Address: Strategic Planning, Dacorum Borough Council. The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

Yours sincerely,

Alex Robinson Strategic Planning Manager Dacorum Bororough Council

This e-mail has been automatically generated by the Consultation software.

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Appendix 3

Appendix 3 - Draft Dacorum Strategic Design Guide SPD Consultation Comments Form

	<p>Draft Dacorum Strategic Design Guide SPD Consultation</p> <p>Comments Form</p>	
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Please return to Dacorum Borough Council, by 23:59 on Sunday 16th August. Comments received after this time will not be considered.

By online consultation portal: If you have internet access, it is recommended that you make your representations online at:

https://consult.dacorum.gov.uk/portal/planning/lp/sdg_spd/sdg_spd;

Alternatively you can respond by:

e-mail to: responses@dacorum.gov.uk

post to: Strategic Planning and Regeneration, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

If you have any queries, please contact the Strategic Planning Team on 01442 228660.

This questionnaire needs to be read in conjunction with the Draft Dacorum Strategic Design Guide SPD consultation documents.

You do not need to answer every question: to those that are relevant to you or that you have a view on.

Personal Details		Please note that * denotes mandatory fields	
Individual's Personal Details		Agent's Details (if applicable)	
Title			
Name*			
Organisation			
Address *			
Post Code *			
Telephone No.			
E-mail			

(This is the Council's preferred method of contact)

Please note: Your name and comments will be made available for public inspection (your telephone number and email addresses will not be made public) and therefore cannot be treated as confidential. Your name and address must be completed for your comments(s) to be considered.

Draft Dacorum Strategic Design Guide SPD Questions

These are the questions that we would like your feedback on.

Part 1: Design Process

Question 1

Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?

Yes / No

If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.

Part 2: Design Principles

Question 2

Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

Yes / No

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

Part 3: Employment Uses Guidance

Question 3

Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

Yes / No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

General Comments

Question 4

Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD?

Yes / No

Your comment(s) Please use a separate sheet for each question you wish to answer

QUESTION 1 Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?

Is your answer to the question Yes or No ?

Yes

No

If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

QUESTION 2 Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

Is your answer to the question Yes or No ?			
Yes		No	

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

<p><i>(Please continue on another sheet of paper if required)</i></p>

Your comment(s) Please use a separate sheet for each question you wish to answer

QUESTION 3 Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

Is your answer to the question Yes or No ?

Yes

No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

(Please continue of another sheet of paper if required)

Your comment(s) Please use a separate sheet for each question you wish to answer

QUESTION 4 Overall, do you have any other comments regarding the Draft Dacorun Strategic Design Guide SPD?

Is your answer to the question Yes or No ?

Yes

No

If yes, please provide your general comments

(Please continue of another sheet of paper if required)

Appendix 4

Appendix 4 - Key points raised by statutory consultees, Town/Parish Councils, other Councils and statutory bodies and other contributors in response to each question and officer response

Question Number 1 SUPPORTING	
Question Text: Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? Y/N	
Key points raised in representations	Officer response
<p>1. Sports England (SE)</p> <ol style="list-style-type: none"> 1 Traditional field drainage patterns such as ditches are missing from Design Process Water. 2 Wind should be included within the Exposure section. 3 Suggestion that figure ground studies should be used relating to Urban Grain on page 33. 4 The Vision, although thorough and grounded in understanding, should also include the aspirational opportunity to innovate such as that of Taunton Garden Town. 	<ol style="list-style-type: none"> 1. Traditional field drainage patterns, such as ditches, are to be included within the SPD in Part 1, page 15. 2. The Exposure section within the SPD only concerns built form and not elements such as wind. 3. Figure ground studies will be included as an example of ‘studies of local urban patterns’. 4. The ‘aspirational’ and innovative’ elements of the Vision are reflected within the design principles. The Vision text used includes the adjectives ‘ambitious’ and ‘distinctive’.
General points raised	
<ol style="list-style-type: none"> 5 One consultee suggested that Historic Landfills should be included within both ‘Other Legacies’ on Page 20 and ‘Observing: Land Use’ on Page 31 given that the LPA will have to consult with the Environment Agency on any planning application relating to a site within 250 metres of a landfill, past landfill site, or site earmarked for landfill in the future. 	<ol style="list-style-type: none"> 5. Historic Landfills are outside the scope of this guidance. The content of the Strategic Design Guide relates solely to those elements that can inform the design of new developments, rather than seeking to identify all site constraints.

Question Number 1 SUPPORTING	
Question Text: Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? Y/N	
Key points raised in representations	Officer response
<p>6 One consultee requested that the SPD stress the importance of chalk streams and the opportunities for habitats enhancement on a landscape scale through Nature Recovery Networks.</p> <p>7 Edges and Beyond – If development is to be proposed in the AONB or Green Belt it is important that greater care is taken with settlement edges to incorporate them as far as possible into the surrounding landscape and landforms.</p> <p>8 Landscape and Visual Impact Assessments should be used to assess potential impacts and inform settlement design.</p> <p>9 The guide should be more definite that ancient woodland will be protected from development.</p>	<p>6. The Strategic Design Guide refers to chalk streams in both the topography and geology, and water sections. It is felt that these references alone are sufficient to meet what is required by the SPD.</p> <p>7. The Council acknowledges this comment and will consider it going forward.</p> <p>8. The Council acknowledges this comment, however it is outside the scope of the Strategic Design Guide to make this recommendation.</p> <p>9. The protection of ancient woodland is a planning policy issue and is outside the scope of the Strategic Design Guide.</p>

Statutory Supporting

1. Nash Mills Parish Council

Other Groups Supporting

1. Herts & Middlesex Wildlife Trust
2. Sport England
3. Canal and River Trust

4. Hallam Land Management
5. Dacorum Environmental Forum Waste Group
6. The Chiltern Society
7. Sports England
8. LQ Estates

Question Number 1 NOT SUPPORTING	
Question Text: Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? Y/N	
Key points raised in representations	Officer response
<p>1. Berkhamsted Town Council</p> <p>10 BTC argue that the SPD does not recognise the notion of urban sprawl that development in the area leads to. They stress that it must make developers consider the impact upon the pre-existing town.</p> <p>11 BTC argue that there is insufficient attention given to linkages with adjacent counties. Given Dacorum's status as a commuter community, its linkage with Bucks and London is much stronger than that of Hertfordshire in general.</p> <p>12 With regard to the Borough's chalklands and their low-water table, BTC note that the SPD should reflect the urgency with which this matter should be addressed.</p>	<p>10. The Strategic Design Guide addresses urban sprawl in Part 1, page 28.</p> <p>11. These points are beyond the scope of the Strategic Design Guide.</p> <p>12. The Council acknowledges this comment and will consider it going forward.</p>

Question Number 1 NOT SUPPORTING	
Question Text: Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? Y/N	
Key points raised in representations	Officer response
<p>2. Dacorum Heritage Trust</p> <p>13 The chalk streams are not represented as a characteristic within the SPD. They underlay the entire area. The soil is largely alkaline, not “less acidic”.</p> <p>14 Clarify what is meant by “Sudden Features”.</p> <p>15 Chalk streams themselves ought to be included as important aquatic ecosystems.</p> <p>16 Both the rivers and wildlife need to be included under the Landscape Framework.</p>	<p>13. The Strategic Design Guide refers to chalk streams in both the topography and geology, and water sections. These references are considered sufficient to meet what is required by the SPD.</p> <p>14. The ‘sudden features’ bullet point on page 13 of ‘Observing: Topography and Geology’ will be removed.</p> <p>15. The guidance within the Strategic Design Guide does not seek to provide a comprehensive list of all environmental factors that will be affected by/influence development. However, chalk streams are referred to within the SPD.</p> <p>16. The Landscape Framework does include both water and wildlife - refer to the ‘consider’ box in Part 1, page 62.</p>
General points raised	
<p>17 One consultee felt as though some of the Borough’s environmental characteristics, such as bat and Roman Snail habitats, were missing.</p> <p>18 Another felt as though the references made on Page 39 were not relevant to Hertfordshire.</p>	<p>17. The guidance within the Strategic Design Guide does not seek to provide a comprehensive list of all environmental factors that will be affected by/influence development. However, bats are included under ‘Species Action Plans’ in Part 1, page 18.</p> <p>18. All of the examples given are from Hertfordshire.</p>

Question Number 1 NOT SUPPORTING	
Question Text: Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? Y/N	
Key points raised in representations	Officer response
19 Some consultees described the document length and the language used as “inaccessible”.	19. The Council acknowledges this comment and will consider it going forward.
20 One consultee noted that the SPD was not specific enough about Dacorum and read like a general document about design.	20. The Strategic Design Guide was prepared to provide guidance for both Dacorum Borough Council and St Albans City & District Council and as such includes examples and references for both geographical areas.
21 One consultee argued that the SPD mentioned national-level planning policies but did not describe what they were, in particular the document does not outline statistical or evidential basis on the quantities of housing required.	21. Housing quantities and the associated evidence base is a Local Plan matter and outside the scope of the Strategic Design Guide. National-level policies are linked for reference.
22 Another consultee asked whether the SPD could be more clear on what “neighbouring housing” it requires developers to consider when planning property. They argue properties immediately neighbouring the site should be focused upon more than buildings “streets away”.	22. This issue is beyond the scope of the Strategic Design Guide and would be considered within the development process.
23 Some consultees suggested that one characteristic, namely the views of the Gade Valley, have failed to be identified within the SPD and will be spoilt by the Hemel Garden Communities project.	23. The Gade Valley will be added into Part 1, page 14.

<p>24 One consultee questioned why historic Rights of Way were not considered as key characteristics and argued that their inclusion would resolve current issues and identify where improvements can be made for cyclists, walkers and horse riders.</p> <p>The consultee suggested that this should be considered within the Site Context section on Page 27. A bullet point for “what is missing” would allow for additional opportunities to be fulfilled, such as Right of Way.</p> <p>25 The ‘Understand Box’ should also include non-motorised vulnerable users (NMU) so that future needs will be sought.</p> <p>26 Rights of way should be considered within the sport and leisure facilities on Page 56 and again on 59 where only walking and cycling are considered under the ‘Movement’ section.</p> <p>27 Another example to include within the ‘What to Observe’ section should be examples of best practice for new community design, such as those in Cambridgeshire where attempts have been made to soften the boundaries between urban and rural with creating strong off-road connections between them as well across the development, in particular bridleways.</p>	<p>24. Rights of Way are referred to within the Strategic Design Guide in Part 1, page 27, and also within Part 2.</p> <p>25. Non-motorised vulnerable users would be considered as part of the ‘pedestrian networks’ and ‘public rights of way’ in Part 1, page 27.</p> <p>26. The Strategic Design Guide’s guidance on Rights of way will be expanded to refer to all non-motorised users.</p> <p>27. The ‘What to Observe’ section is referring to the existing context. Images of examples of good design are given in Part 2.</p>
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Question Number 1 NOT SUPPORTING	
Question Text: Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? Y/N	
Key points raised in representations	Officer response
<p>28 The SPD must define what is meant by 'sustainability' on Page 5.</p> <p>29 On the same page, the reference to land 'formerly' in the Greenbelt is presumptions and inaccurate. It should read as "currently in the Greenbelt.</p>	<p>28. A definition for 'sustainability' will be added.</p> <p>29. To avoid any ambiguity and future-proof the document, the reference to the Green Belt will be removed from Page 5.</p>
Specific textual additions to consider	

<p>30 Page 5 – add that there needs to be sustainable mixed-use environments.</p> <p>31 Page 16 – needs to add that green infrastructure corridors could be used to encourage use of sustainable transport.</p> <p>32 Page 26 – needs to link connectivity to key LTP4 policies and supporting strategies.</p> <p>33 Page 27 – needs to be more specific when referring to sustainable modes of transport.</p> <p>34 Context: Left Hand Box (Understand) Bullet Point 1 – needs to read: ‘Pedestrian and cycle networks surrounding the site.’</p> <p>35 Left Hand Box (Understand) Bullet Point 3 – needs to read: ‘Public transport networks (including bus and rail networks).’</p> <p>36 Right Hand Box (Examples of What to Observe) Bullet Point 1 – needs to read: ‘Public Rights of Way, National Cycle Networks and Public Transport Networks.’</p> <p>37 Site Context: Left Hand Box (Understand) Bullet Point 1 – needs to read: ‘Links and connections to wider pedestrian, cycle and public transport networks.’</p>	<p>30. Mixed-use environments are already included on page 3.</p> <p>31. Green Infrastructure Corridors fall outside the scope of Part 1 and are covered instead in Part 2, Design Principles.</p> <p>32. These references will be added and will replace the existing ones.</p> <p>33. ‘Sustainable modes of transport’ does not appear in the document. The modes of transport specified are: pedestrian, cycle, public transport.</p> <p>34. The document text will be updated to reflect this comment.</p> <p>35. The Council considers that it is not necessary to clarify the meaning with additional text.</p> <p>36. Public transport is covered within the ‘Understand’ box in Part 1, page 27, therefore no change is needed.</p> <p>37. The document text will be updated to reflect this comment.</p>
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<p>38 Right Hand Box (Examples of What to Observe) Bullet Point 1 – needs to read: ‘Walking, cycling and public transport networks.’ Outputs:</p> <p>39 Right Hand Box (Supplementary Information) line two needs to read: ‘Walking and cycling times studies.’</p> <p>40 Need to add a paragraph after bullet points that emphasize the need to consider the connectivity of nearby facilities and amenities in order to reduce the need to travel by car.</p> <p>41 Amenity Capacity - Paragraph 2 – need to highlight that the development of new or enhanced amenities offers the opportunity to improve provision for existing residents reducing the need to travel.</p> <p>42 Edges - Paragraph 3 – should emphasize that Transport Infrastructure edges are important in that they provide good connectivity to the surrounding area.</p> <p>43 Left Hand Box (Understand) Bullet Point 4 – needs to read: ‘Amenity provision and capacity and how connected they are to the surrounding area.’</p>	<p>38. These elements are already covered, therefore no change is needed.</p> <p>39. These studies are not required at this stage of the design process.</p> <p>40. The document text will be updated to reflect this comment.</p> <p>41. The benefits to existing residents are already outlined on this page, therefore no further text is needed.</p> <p>42. The importance of transport infrastructure edges is already discussed in Part 1, page 28.</p> <p>43. The clarification of intent is not required, as the box itself relates to the wider context of a site (i.e. surrounding area). Connectivity is specifically addressed separately on pages 26-27.</p>
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<p>44 Right Hand Box (Examples of What to Observe) need to add another bullet point that reads: 'Walking and cycling routes.'</p> <p>45 Wider Context - Consideration should also be given to the current desires to mask the front of development or set back from existing streets (typically with a vegetation strip then small service type road) , and the balance of an active frontage with passive surveillance over hard, impermeable fronts that give noting back to those travelling along the street.</p> <p>46 Site Context - Left Hand Box (Understand) Bullet Point 5 – needs to read: 'Effect and influence of edges on the site providing good connectivity to the surrounding area.'</p> <p>47 Right Hand Box (Examples of What to Observe) Bullet Point 3 – needs to read: 'Walking and cycling routes to provide good connectivity.'</p> <p>48 Outputs - Left Hand Box (Key Outputs) need to add bullet point that reads: 'Connectivity to nearby facilities and amenities.'</p> <p>49 Context: Land Use Page 30. Education and Sports Facilities Paragraph 1 – need to add that as school sites and sports facilities often contribute to landscape edges, they can help with reducing the need to travel by car. Possible inclusion of utility or leisure transport in the</p>	<p>44. Public transport is covered within the 'Understand' box in Part 1, page 27, therefore no further text is needed.</p> <p>45. This level of detail is beyond the scope of the Strategic Design Guide.</p> <p>46. The suggested text is too narrow in its focus and does not encompass the broader meaning of 'effect and influence of edges on the site', therefore no change is needed.</p> <p>47. The example relates solely to observing the existing context, therefore no change is needed.</p> <p>48. The Key Outputs relate solely to existing context, therefore no change is needed.</p> <p>49. The suggested text falls outside the scope of what is required within this section.</p>
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natural environment, rural and rights of way links offer excellent and attractive journey options for walking and cycling, and should be protected and enhanced, notably where existing infrastructure causes severance.

50 Observing Place: Example Page 44. The street profile presented is neither to a standard we would support, nor a design that would align with LTP4, notably having in effect two 'roads' and a total of 5 lanes of vehicles (parked or moving), no cycling provision and sub standard footpaths that do not meet minimum standards. This should be removed; we can provide examples of good/adoptable profiles if required.

51 Connectivity and Places to Connect to Page 45 Need to emphasize that it is important to demonstrate the sustainability of the site and the need to reduce travel by cars. Illustrating Strengths, Opportunities and Structuring Elements Pages 51 and 52.

52 The Vision Page 58. Paragraph 2 – need to highlight that an important consideration is how connected a site is to the surrounding area.

53 Paragraph 4 – need to highlight that an important consideration is access by all modes of transport.

54 Relating the Vision to the Frameworks Page 59. Movement Bottom Left Hand Box, Bullet Point 3 –

50. The illustration provides an example of a study drawn to understand the existing context. This needs to be understood to identify improvements when retrofitting or designing new streets.

51. This addition is not appropriate for this part of the document. However the importance of reducing the need to travel by car is covered in Part 2 Design Principles, and the contextual baseline for designs which reduce the need to travel by car is detailed in Part 1 Design Process page 27.

52. The document text will be updated to reflect this comment.

53. This will be addressed through point 52.

54. The document text will be updated to reflect this comment.

<p>needs to read: ‘Consideration to walking, cycling and public transport routes.’</p> <p>55 Land Use Framework Page 60. Consider Bullet Point 6 – need to highlight the importance of sustainable movement networks. Landscape Framework Page 62.</p> <p>56 Consider Bullet Point 5 – need to highlight that the promotion for active travel such as walking, and cycling will contribute to healthy lifestyles. Movement Framework Page 64.</p> <p>57 Paragraph 1 – need to highlight new places should be connected, by sustainable modes of transport such as walking and cycling, with existing settlements. Inclusion of a hierarchy aligned to HCCs LTP (and manual for streets) would be highly beneficial Statement that a street doesn’t necessarily include vehicle access Designed for all users and uses including as a place. Inclusion of highways adjacent to sites in master planning design process</p> <p>58 Para 5.7 Street furniture, signs, columns etc. and trees should be placed in positions to ensure the footway width is maintained at all time (there may be opportunity here to also ensure utility service boxes are not placed on footpaths etc.</p> <p>59 Movement and Place Paragraph 1 need to emphasize how this contributes to placemaking.</p>	<p>55. Within the document text ‘transport provision’ will be replaced with ‘sustainable movement’.</p> <p>56. This point is covered in the introductory section on page 64, therefore additional text is not considered necessary.</p> <p>57. This point is covered within Part 2, Design Principles, therefore additional text is not considered necessary.</p> <p>58. These elements fall outside the scope of the Strategic Design Guide.</p> <p>59. This point is already covered within this section, therefore additional text is not considered necessary.</p>
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<p>60 Movement Paragraph 1: need to highlight that movement needs to include pedestrian, cycle and public transport movements.</p> <p>61 Movement Framework: Example Page 65. Additional Resources - it is noted that roads in Hertfordshire: design guide is currently in the process of being reviewed and updated</p> <p>62 Urban design framework page 66 paragraph 1 - need to emphasize how this contributes to placemaking.</p> <p>63 Page 17 "Site Context Examples of What to Observe" at "grasslands" add "especially species rich grassland". This Natural England information could be added as a reference (Whilst identifying whether grassland is alkaline or neutral is necessary, it isn't sufficient.)</p> <p>64 Page 26 "Public Transport" photo and words. 2nd sentence re connectivity to railheads at least needs "highly" before "desirable" and "is essential" is preferred.</p> <p>65 Under Ecology, I would point out that Tring Park, High Scrubs etc woodland contains comparatively little beech, and is predominantly mixed deciduous woodland. Ash is more significant and is referenced in local place names</p>	<p>60. The document text will be updated to reflect this comment.</p> <p>61. The Council notes this comment.</p> <p>62. This point is already covered within this section of the Strategic Design Guide.</p> <p>63. The document text will be updated to reflect this comment.</p> <p>64. The document text will be updated to reflect this comment.</p> <p>65. The document text will be updated to reflect this comment.</p>
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<p>66 There appears to be no mention of straightforward brick and flint, which is a frequently encountered combination, but only of flint and stone chequerwork, which is something usually encountered in only church architecture and would be unduly expensive to recommend to developers.</p> <p>67 Local brick covers a wider colour range than just orange/red, extending to brown and purple according to its position in the kiln. In general the orange shade is not to be encouraged as it is more susceptible to frost.</p> <p>68 I was disappointed that the guidance failed to emphasise the special character of 19th/20th century Estate housing, which is a prominent feature of Tring and surrounding villages, and also of Aldbury and Ashridge.</p> <p>I would mention the 56 houses in Tring (Miswell Lane and elsewhere) which Lord Rothschild built between 1909 and 1913 and handed over to Tring Urban District Council. While they are deliberately differentiated from his own Estate houses, they accord very well with them and with neighbouring properties and do not stand out as obvious social housing.</p> <p>69 We are concerned that the Guide's sweeping critique of modern developments and apparent</p>	<p>66. This treatment is considered in Part 1, page 36 (box 2), therefore additional text is not considered necessary.</p> <p>67. The document text will be updated to reflect this comment.</p> <p>68. The Council acknowledges this comment, however unfortunately it is not possible for the Strategic Design Guide to be fully comprehensive of all characteristics.</p> <p>69. The Strategic Design Guide includes references to both Hemel Hempstead and New Towns. Contemporary best practice is included in Parts 2 and 3.</p>
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reliance on historical building patterns is unhelpful.

It is recommended that the Guide identify the most successful and sustainable examples of twentieth century popular places to live and also include those as references for future developments.

- 70 It is unclear whether stakeholders, including the local community, were involved in development of this Design Guide alongside SADC and Herts IQ.
- 71 An explanation on street types and how they deliver a well-designed place would be beneficial.
- 72 All of the example images feature contemporary designed homes which may not necessarily reflect the local vernacular or be preferred by the local community. This selection of images should be revised to include examples of homes of a traditional design and appearance which research has shown continue to be very popular.
- 73 Page 8 (How to use this guide) contains a diagram that provide a broad overview of the planning process for strategic sites. This differs from the same diagram that was displayed on page 8 of the SADC Strategic Site Design Principles document and could result in conflicts with the cross boundary applications.

70. The Strategic Design Guide was prepared in accordance with the Council's Statement of Community Involvement (SCI). Part 2 Design Principles sets out engagement at site delivery.

71. An explanation is provided in Part 2, Design Principles, therefore additional text is not considered necessary.

72. The images included within the document are intended to encourage innovation and higher design aspirations. Their selection does not preclude 'more traditional' house types.

73. The Council acknowledges this comment. A bespoke approach will be developed for cross-boundary sites (Hemel Garden Communities).

Question Number 1 NOT SUPPORTING	
Question Text: Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? Y/N	
Key points raised in representations	Officer response
<p>74 Page 42 (Spatial typologies) refers to ‘hoe typology’ with development parallel to the topography and roads/pavements perpendicular with the contours. It is likely that these roads/pavements will exceed Hertfordshire County Council (HCC) slope angles and will be non-compliant with highways standards.</p> <p>75 Each of the five sketches on pages 42-43 represent houses as long thin narrow wide frontages – this will not deliver a density of 40dph as the density of properties cannot be delivered through wide frontage property.</p> <p>76 The planning process includes reference to Design Review Panels and Design Code(s). It should be clarified that these elements will not apply in all instances and the SPD should define which sites will be subject to design codes, for example strategic allocations, and define the type of applications that would be expected to be subject to the Design Review Panel.</p>	<p>74. The typologies referred to are diagrammatic and are not intended to be prescriptive.</p> <p>75. The typologies referred to are diagrammatic and are not intended to be prescriptive.</p> <p>76. The decision on which sites will be subject to design codes will be determined by the Local Plan / Development Management process. This page of the Strategic Design Guide will be amended to show both the Citizens Review Panel and Design Review Panel as optional.</p>

Statutory not Supporting

1. Berkhamsted Town Council

Other Groups not supporting

1. W Lamb Ltd.
2. The Hertfordshire Society
3. Dacorum Heritage Trust

Question Number 2 SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Number of responses 61, Y – 21%, N – 48%, No response – 31%	
Key points raised in representations	Officer response

Canal and River Trust

- | | |
|---|---|
| <ol style="list-style-type: none">1. CRT questioned why The Grand Union Canal is not shown on the Green Infrastructure map on page 16.2. The canal corridor should therefore not be considered as a barrier to connectivity and proposed developments should seek to unlock the full potential of the canal corridor in their design and layout.3. The addition of a specific section within the SPD outlining the principles of quality design. CRT are currently producing 'Great Waterside Places' which will detail specific design principles to be included in the final draft of the SPD.4. Developments should be required to include well designed connections to existing networks, such as the towpath, to promote connectivity and sustainable travel.5. Developments need to consider the visual impacts of parking areas and parking on access roads on the canal's outward perspective.6. Proposals must aim to avoid creating direct views of the developments 'back of house' from the canals | <ol style="list-style-type: none">1. The Green Infrastructure map is not intended to be a comprehensive record of all green infrastructure within the Borough. Rather, it is a high level map that illustrates the variety of landscape types. The Grand Union Canal is highlighted on the Water Infrastructure map in Part 1, page 14.2. The canal corridor is considered an asset and attraction, rather than a barrier. Setting out design principles for the canal is beyond the scope of the Strategic Design Guide.3. The additions suggested are beyond the scope of the Strategic Design Guide. The Canal and River Trust's guidance will be included within the 'Additional Guidance' list in Part 2, page 7.4. Principle 4.1.1 outlines 'clear, frequent and direct links between new and existing places', and 4.7 refers to sustainable travel.5. Principle 4.3.4 addresses 'reducing the visual impacts of new development'.6. To be addressed by including the Canal and River Trust's guidance within the 'Additional Guidance' list in Part 2, page 7. |
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<p>outward perspective which heavily degrades the canals credentials as a green corridor.</p> <ol style="list-style-type: none"> 7. Vehicles can be visually buffered from the canal through clever design and use of landscaping. 8. The Trust do not promote the provision of car parking or access roads adjacent to the canal unless suitable screening is provided. 9. Developments should therefore be required to carefully consider the choice of boundary treatment along both sides of the canal corridor. 10. Consideration must be given to the impacts of lighting on the natural environment. CRT recommend that any external lighting is angled downward and no flood lighting should be used to show consideration for bats. 11. Development should overlook the towpath or canal to give a perception of public safety. 12. Developments should be required to include signage to highlight connections to the canal the case of development adjacent or connected to the canal corridor this should include appropriate wayfinding to/on or from the towpath as well as to destinations along it. All wayfinding on or adjacent to the towpath should be agreed first with the CRT. 	<ol style="list-style-type: none"> 7. To be addressed by including the Canal and River Trust's guidance within the 'Additional Guidance' list in Part 2, page 7. 8. To be addressed by including the Canal and River Trust's guidance within the 'Additional Guidance' list in Part 2, page 7. 9. To be addressed by including the Canal and River Trust's guidance within the 'Additional Guidance' list in Part 2, page 7. 10. To be addressed by including the Canal and River Trust's guidance within the 'Additional Guidance' list in Part 2, page 7. 11. Principle 5.4 'Safe, Overlooked Spaces' will be expanded to include all public spaces. 12. To be addressed by including the Canal and River Trust's guidance within the 'Additional Guidance' list in Part 2, page 7.
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<p>13. It needs to be ensured that any planting proposed includes native species and is appropriate for the waterside setting.</p> <p>14. Any planting needs to be set back sufficiently from the canal corridor to allow for future growth and ensure it does not adversely impact on the stability of the canal infrastructure or affect safe navigation of the waterway.</p> <p>15. Section 7 on Health and Wellbeing – CRT promote the use of the canal for this purpose. This section does not mention the need to link walking and cycling routes into existing provision to ensure it can cope with increased housing.</p> <p>16. An audit of provision, and the impact of development on should be carried out, with mitigation put in place beyond the site boundary as necessary.</p> <p>17. Section 9 – there is potential for the canal to accept surface water discharges from sites and this should be referenced.</p> <p>18. It should however be noted that the drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways and the Trust is not a</p>	<p>13. Principle 8.2.2 refers to 'locally-significant native species'.</p> <p>14. To be addressed by including the Canal and River Trust's guidance within the 'Additional Guidance' list in Part 2, page 7.</p> <p>15. The proposed additional text is already covered within Design Principles Category 4, 'A Connected Place'.</p> <p>16. The requirement to carry out an audit provision of facilities and infrastructure is covered in Part 1. Mitigation would be identified on a site-by-site basis through the Development Management process. Local Plan policies will secure mitigation via planning obligations and legal mechanisms.</p> <p>17. This point is beyond the scope of the Strategic Design Guide.</p> <p>18. This point is beyond the scope of the Strategic Design Guide.</p>
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Question Number 2 SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Number of responses 61, Y – 21%, N – 48%, No response – 31%	
Key points raised in representations	Officer response
<p>land drainage authority and therefore any proposed discharges are not granted.</p> <p>19. The Trust also wish to highlight the potential of the canal for heating & cooling for district heating network or individual schemes and reference to this potential for the canal to contribute to low carbon technologies should be included.</p>	<p>19. This level of detail is beyond the scope of the Strategic Design Guide.</p>
<p>Grove Fields Residents Association (GFRA)</p> <p>20. The GFRA lack confidence that developers and landowners will abide to the principles and that DBC will enforce them.</p>	<p>20. The Design Principles categories and outcomes are set out in emerging new Local Plan policy to aid enforcement.</p>

Question Number 2 SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Number of responses 61, Y – 21%, N – 48%, No response – 31%	
Key points raised in representations	Officer response
<p>Chiltern Society</p> <p>21. The Society would like to see more emphasis placed on connecting habitats through green and blue infrastructure. These measures must be incorporated into Masterplans, with all the necessary surveys undertaken prior to any planning permission being issued.</p> <p>22. The SPD should include a section relating to reducing abstraction of water from local watercourses, managing habitats in sustainable drainage systems, and reducing the risk of increased pollution to local watercourses.</p>	<p>21. The document text will be updated to reflect this comment.</p> <p>22. This level of detail is beyond the scope of the Strategic Design Guide.</p>
<p>Homes England</p> <p>23. Policy should be written within the context of the government's aim for local planning authorities to be looking to future proof or at least reference future targets within the context of national planning policy in the NPPF and PPG.</p>	<p>23. This context is a matter for the development of Local Plan policy and is beyond the scope of the Strategic Design Guide.</p>

The Crown Estate

24. Principle 4.2.3 goes beyond the remit of what would be expected as part of a planning application. It should be removed, or the intent clarified.
25. Principle 6.3.2 suggests adequate threshold space for dwellings. If this is applied rigidly then Mews streets and frontages that directly address the pavements will not be supported. Notably, properties with direct access to the street is a characteristic of some of Dacorum's Conservation Areas.
26. Principle 6.6.3 (numbering should be 6.7.1) please note that some statutory authorities require access and therefore internal utility boxes may be resisted, although this could potentially be overcome by smart metering.
27. Principle 7.4.4 this paragraphs suggests that parks should meet Green Flag standards but does not provide a quality threshold.
28. Principle 8.1.1 The requirement for BREEAM Excellent for buildings over 1,000 sq m is onerous and should be set at Very Good, with an aspiration for Excellent.
29. Principle 8.7.2 The requirement for mandated district heating and power networks may not be appropriate and its feasibility should be investigated. Energy

24. Principle 4.2.3 is applicable only 'where justifiable in planning terms' and therefore would not be applied to all developments.
25. The inclusion of the text 'appropriate to the typology' within Principle 6.3.2 allows for a degree of flexibility.
26. The document text will be updated to reflect this comment.
27. The quality threshold is the level required to achieve the Green Flag standard.
28. The standards within the Strategic Design Guide will reflect emerging new Local Plan policy.
29. The document text will be updated to reflect this comment.

Question Number 2 SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Number of responses 61, Y – 21%, N – 48%, No response – 31%	
Key points raised in representations	Officer response
<p>networks are only effective at the scale and density of East Hemel and NWHH if:</p> <ul style="list-style-type: none"> • There is a source of waste heat to be exploited centrally and distributed; • And there is a mix of uses with simultaneous heating/cooling demands that facilitate energy sharing in denser locations (e.g. district centres). <p>30. Principle 10.5.1 clarification of the intent – planning stage should read ‘reserved matters stage’</p>	<p>30. The precise stages and deliverables would be confirmed through a Planning Performance Agreement.</p>

Harrow Estates

31. Page 6 - Whilst innovative and modern designs should be encouraged it should also be recognised that homes with a traditional design and appearance continue to be very popular with many people. The text should be amended to: "Putting lessons from the local context into practice should be achieved through reflecting the character of existing buildings in the immediate locality (as suggested in the National Design Guide).

32. Page 15 - HE agree. However, we note that this detailed guidance appears to conflict with the "Contemporary Spatial Typologies" set out in Part 1.

33. HE support the principles for creating great streets. However, the imagery should be revised to present a more balanced mix of contemporary and traditional architectural styles.

34. Page 18 - HE support the principles for creating great streets. However, the imagery should be revised to present a more balanced mix of contemporary and traditional architectural styles.

35. Page 20 - Whilst the principles for creating great homes the imagery should be balanced with more examples of traditional architectural styles which many people continue to have a preference for when choosing a new home.

31. This intent is set out in the Strategic Design Guide, therefore no change is needed.

32. The Council does not consider there is a conflict with Part 1.

33. The images used within the Strategic Design Guide show contemporary and successful street attributes that can be achieved with a number of different architectural styles

34. The images used within the Strategic Design Guide show contemporary and successful street attributes that can be achieved with a number of different architectural styles.

35. The guidance within the Strategic Design Guide is not prescriptive on architectural style.

Question Number 2 SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Number of responses 61, Y – 21%, N – 48%, No response – 31%	
Key points raised in representations	Officer response
<p>36. Page 26 – The requirements in Section 8 go beyond what is currently and will be required through the Future Homes Standard implemented through the Building Regulations. The text should be revised to make it clear that these additional exemplary standards are encouraged but are not mandatory.</p> <p>37. We support the aspiration for high sustainability standards for new buildings, however the BREEAM targets set out in 8.1.1 must be subject to technical and commercial viability to ensure that specific sustainability opportunities, and any constraints relating to each particular site and development proposal, are appropriately accounted for.</p> <p>38. 8.1.2 seeks certification of all new dwellings to the BRE’s Home Quality Mark Five Star rating. While we support measures to ensure that homes are built to the highest quality, a requirement for five star certification for all new homes is unrealistic and unlikely to be achieved.</p>	<p>36. The Strategic Design Guide is underpinned by the principle of ‘comply or justify’, therefore no change is needed.</p> <p>37. The ‘comply or justify’ principle that underpins the Strategic Design Guide would apply to the sustainability standards of new developments.</p> <p>38. The ‘comply or justify’ principle that underpins the Strategic Design Guide would apply to this requirement.</p>

<p>LQ Estates</p> <p>39. The detail within Section 5 should be agreed with the Local Highways Authority, including the Adoption Team, to ensure that proposals will be acceptable in highways terms and meet adoptable standards.</p> <p>40. Section 7 - Incorporating food production on all sites is unlikely to be feasible.</p> <p>41. Allotments - Whilst provision of allotments is appropriate on some sites, on others an off-site contribution towards allotment provision is more appropriate and the SPD should reflect this option.</p> <p>42. Section 8 – The sustainability standards may not be viable for all sites and the SPD should reflect this.</p> <p>43. It should be clarified that SuDS form part of the on-site open space provision.</p> <p>44. The contents of this section also needs to be agreed with the Lead Local Flood Authority.</p> <p>45. It should be clarified what is considered to be a 'large' development. This should also be amended to reflect that this will not be feasible/viable for all developments</p>	<p>39. The Strategic Design Guide does not affect this process.</p> <p>40. The 'comply or justify' principle that underpins the Strategic Design Guide would apply to this requirement.</p> <p>41. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p> <p>42. The 'comply or justify' principle that underpins the Strategic Design Guide would apply to the sustainability standards of new developments.</p> <p>43. The types of open space that from part of on-site provision is determined by planning policy.</p> <p>44. The Strategic Design Guide does not affect this process.</p> <p>45. The 'comply or justify' principle that underpins the Strategic Design Guide would apply to the size of the development. The decision on whether this principle should be applied will be determined on a site-by-site basis. The requirements within the Strategic Design Guide reflect emerging new Local Plan policy.</p>
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Question Number 2 SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Number of responses 61, Y – 21%, N – 48%, No response – 31%	
Key points raised in representations	Officer response
46. Section 10 - Paragraph 10.5 sets out what should be submitted in order to secure quality at the planning stage. The elements listed at 10.5.1 and 10.5.2 are detailed matters and should not be required at outline planning stage. The SPD should make this clear.	46. The application of this principle is to be determined as part of pre-application process on a site-by-site basis.

Statutory Supporting

N/A

Other Groups Supporting

1. Sport England
2. Canal and River Trust
3. Grove Fields Residents Association
4. Wendover arm Trust
5. Chiltern Society
6. Homes England
7. The Crown Estate
8. Harrow Estates
9. LQ Estates

Question Number 2 NOT SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Key points raised in representations	Officer response
<p>Herts & Middlesex Wildlife Trust (HMWT)</p> <p>47. The NPPF requirement for development to deliver biodiversity net gain by reference to the Defra biodiversity metric should be more explicitly stated. 8.2 needs to be edited so that it reads: 'Development must deliver measurable biodiversity net gain, by utilising the DEFRA biodiversity metric, preferably on-site or as part of enhancement and expansion of nearby natural habitats. A mitigation hierarchy should be used: 'avoid, minimise, restore and offset'.</p>	<p>47. The document text will be updated to reflect this comment.</p>

<p>Berkhamsted Town Council (BTC)</p> <p>48. BTC are concerned that the SPD is too focussed on large scale developments and lacks sufficient guidance for mid-scale developments that will not be able to accommodate the ‘grand designs’ set out in the document.</p> <p>49. BTC argue that the document reads as though the natural and environmental impact of development reads like an afterthought. The guidance is ‘business as usual’ and is not proactive enough; it remains a ‘do what you can to minimise detrimental impact’ approach.</p> <p style="padding-left: 40px;">Section 7.6 on air pollution is vague and sparse. Developers should be required to evidence the base line pollution levels and demonstrate precise proposals for how they will manage air flow and minimise pollution.</p> <p>50. Carbon neutrality is treated as an ‘optional extra’ within the SPD.</p> <p>51. Similarly, the adverse weather section is also vague. Phrases such as “trees and soft landscapes should be climate resilient” are inadequate given the effects of climate change that are, at this point, inevitable.</p> <p>52. Proposals should demonstrate the impact of soft landscaping and trees and their ability to control flood management, air quality, mental health, and attractiveness, not just climate.</p>	<p>48. The Council acknowledges this comment and is producing further guidance for smaller scale development. However, there remains scope for all development to contribute to the Strategic Design Guide principles.</p> <p>49. The requirements for air pollution form part of planning policy and are beyond the scope of the Strategic Design Guide.</p> <p>50. The route towards net zero carbon is set out in the emerging new Local Plan policy.</p> <p>51. The Council acknowledges this comment and will consider it further in future development guidance.</p> <p>52. Flood management and drainage is covered in Principle 5.7.</p>
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Question Number 2 NOT SUPPORTING

Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

Key points raised in representations

Officer response

53. Cycle routes are discussed but current provision is not remotely acceptable.

53. The Council acknowledges this comment, however it is outside of the scope of the Strategic Design Guide.

54. No mention of community-based utilities provision such as community energy schemes or waste management facilities. How about encouraging local food waste reprocessing into energy?

54. The document text will be updated to reflect this comment.

55. More emphasis should be given throughout the document on incorporating local vegetation (green corridors, trees, hedgerows, ponds etc., within the design).

55. These elements are included within Principles 5.7.1, and 8.2, therefore no change is needed.

56. The Town Council are delighted to see references to reducing dependency on cars, although aspiration needs to be backed up with specific commitments in terms of (for example) targets for cars per household ratios.

56. These points are beyond the scope of the Strategic Design Guide.

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Key points raised in representations	Officer response
<p>Nash Mills Parish Council</p> <p>57. A reduction in reliance on cars is unlikely given the poor provision of train services and a lack of alternative local transport.</p> <p>58. Whilst the document mentions a minimum size for balconies there does not seem to be a minimum internal space requirement noted.</p> <p>59. More detail in 7.3 is needed, particularly on how DBC will ensure delivery of this proposal and how our overstretched services will be futureproofed.</p> <p>60. The potential to encourage an increase in electric car use is not mentioned but would also be relevant under this heading.</p> <p>61. 8.3 Drain Places Naturally. The image used within the section does not seem appropriate.</p>	<p>57. Current transport provision is beyond of the scope of the Strategic Design Guide.</p> <p>58. Principle 6.4 refers to the national space standards.</p> <p>59. These issues are beyond the scope of the Strategic Design Guide.</p> <p>60. Electric car use is promoted in Principles 8.6.3 and 6.1.</p> <p>61. The images used within Principle 8.3 illustrate well-designed SuDS infrastructure.</p>

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Key points raised in representations	Officer response
<p>Dacorum Environmental Forum Waste Group</p> <p>62.8.1.3 Route toward achieving zero-carbon homes. This may be achieved through certification such as Passivhaus or appropriate carbon offsetting.</p> <p>8.1.4 These targets are not sufficiently ambitious, or easy to relate to carbon reduction.</p> <p>A more specific and ambitious standard akin to Germany's KfW-40-Standard is called for to replace BREEAM.</p>	<p>62. The route towards net zero carbon is set out in the emerging new Local Plan policy. The standards referenced within 8.1 are widely used and recognised in the UK.</p>

<p>W Lamb Ltd (WLL)</p> <p>63. WLL would recommend delaying adoption of the Strategic Design Guide until after the NMDC has been published and digested and should then be fully reflected in the strategic guide, to avoid becoming out of date and irrelevant.</p> <p>64.2.1.2 Whilst walking distances to such facilities are certainly a desired feature of any development, it is not to say that an application should be refused if not within walking distance.</p> <p>65.2.1.3 Whilst an acceptable overall principle this is highly ambiguous. What does 'low' traffic mean? Who has the final say on what 'low' levels of traffic are?</p> <p>66. Sections 3.3.3 and 3.3.4 use language such as 'regular street crossings' and 'frequent places to stop'. Such language is ambiguous and it is unclear what is meant by 'regular' and 'frequent' and yet an application could be refused if it is not deemed to meet with these requirements.</p> <p>67.4.7.2 - Flexibility needs to be added in to this requirement to prevent applications being refused unnecessarily.</p>	<p>63. The equivalent national document to the Strategic Design Guide is the National Design Guide, published in October 2019. Design codes are beyond the scope of the Strategic Design Guide. Future strategic planning work will reflect the contents of the National Model Design Code.</p> <p>64. The Strategic Design Guide sets out factors to be considered as part of the Development Management decision process. It does not specify grounds for refusal. However, development that is not 'walkable' is unlikely to be supported.</p> <p>65. The established concept 'low traffic' is explained within the guidance documents referenced under 'Additional Guidance'.</p> <p>66. It is beyond the scope of the Strategic Design Guide to set out standards for these elements. The application of these principles is dependent on site context and the Guide is to be used collaboratively with Development Management officers and applicants to agree such matters.</p> <p>67. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p>
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<p>68.4.7.4 and 4.7.5 require the extension of existing walking and cycling routes to connect with networks outside of the site. This may not be possible to provide outside of land controlled by the Applicant or highway authority.</p> <p>69.4.7.6 requires proposals to 'future proof in anticipation of changes in transport'. This is not an acceptable or appropriate requirement to make. For example, should proposals be future proofing against transport changes that are in the immediate pipeline, or should they be future proofing against transport changes which have not been publically announced. How far will an application have to go in terms of demonstrating 'future-proofing' for it to be considered acceptable?</p> <p>70. Section 5 is overly prescriptive and does not allow for sufficient flexibility with regards to design.</p> <p>71.5.1.2 seeks to prevent the use of any cul-de-sacs. In many instances, the use of cul-de-sacs may be an appropriate response to the local character or may be a good response to site constraints.</p> <p>72.5.11.1 sets out that developments should integrate parking into the streetscene with 'minimal' visual impact. However 5.11.2 goes onto to state that on-street parking would be encouraged. As such the use of on-street parking is likely to impact the visual streetscene.</p> <p>73.6.1.2 states that internal layout should reflect contemporary living preferences with integrated</p>	<p>68. Designs are expected to demonstrate provision of routes within the site that connect with networks outside of the site. The principle of comply or justify takes into account potential constraints on this.</p> <p>69. The requirements are set out in the emerging new Local Plan policy.</p> <p>70. Design Principles Category 5's content reflects what is considered to be best practice design. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p> <p>71. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p> <p>72. Principle 5.11.1 provides guidance on layout, materials and planting irrespective of parking location and therefore is not in conflict with Principle 5.11.2.</p>
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<p>kitchen/family rooms. This is one type of preference, other future residents may demonstrate a desire for separate rooms. It is not the role of a Design Guide to set 'living preferences'.</p> <p>74.6.1.3 requires homes to have electric car charging points. Such a requirement comes at considerable financial cost to developers and should be rooted in planning policy.</p> <p>75.6.4.3 calls for family-sized dwellings to exceed sizes set out in the national minimum space standards. It should not be the role of a Design Guide to seek standards which exceed national guidance.</p> <p>76.7.1.2 requires developments to provide off-road cycle routes between homes and key destinations. This may not be possible to provide outside of land controlled by the Applicant or highway authority.</p> <p>77.7.1.3 requires developments to provide physically segregated cycle lanes on primary streets. This may not be suitable for every site due to perhaps physical constraints which may make it impossible to provide adjacent to primary streets.</p> <p>78.7.2.1 should be reworded to provide greater flexibility, with convenient bicycle storage provided in safe and secure storage areas across a range of locations, from shared ground floor areas, through to smaller internal stores on different levels, or appropriate storage within</p>	<p>73. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p> <p>74. The requirements are set out in the emerging new Local Plan policy.</p> <p>75. The role of the Strategic Design Guide is to set locally specific standards.</p> <p>76. This generally applies to the extent of routes within a site. Connections should be provided to routes outside of the site.</p> <p>77. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p> <p>78. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p>
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Question Number 2 NOT SUPPORTING	
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Key points raised in representations	Officer response
<p>apartments that can be utilised for general storage for non-cycle owners.</p> <p>79.7.5.1. It is too onerous to request that every site improves air quality and this should be reworded so to encourage improvements where possible.</p> <p>80.7.5.2. It is not reasonable or suitable for every site to cater for food production and orchards. The wording of this section requires amending to encourage the exploration of opportunities for food production.</p> <p>81. This section seeks compliance with BREEAM 'Very Good' or 'Excellent' for non-residential buildings and BRE's Home Quality Mark Five Star for all residential buildings. Unless this is clearly set out in policy it should not be included in the Design Guide</p>	<p>79. The guidance outlines how sites should contribute, such as by incorporating green infrastructure and using design to reduce car dependency.</p> <p>80. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p> <p>81. The standards within the Strategic Design Guide will reflect the emerging new Local Plan policy.</p>

<p>The Hertfordshire Society</p> <p>82. The design guide currently lacks robust standards that promote suitable space for flexible home working as well as better internal space standards that include:</p> <ul style="list-style-type: none"> • Cross ventilation to ensure dwellings are both cooler and can reduce the spread of infection • Private outside space including balconies for all flats. <p>83. The guidelines for the amount of open green space required in new developments are felt to be inadequate.</p> <p>84. An explicit objective has to be low-car environments; the space demands of car ownership frustrate space standards for sustainable movement, green space as well as internal building spaces.</p> <p>85. Existing sustainable travel corridors should be defined and then incorporated as the basis for integrated sustainable land use and travel planning.</p> <p>86. Providing everyone with adequate space to move and live should be part of greater resilience in physical planning. Standard 2m wide or less footways for instance do not allow this.</p> <p>87. Walking and cycling require greater priority in road design, space allocation and more extensive public rights of way networks in existing urban areas.</p>	<p>82. These suggestions are covered under Principles 8.5 (ventilation), 6.4.3 (space), 6.2.1 (outdoor space) and 6.1.2 (home-working).</p> <p>83. The requirements for the provision of open space in new developments is set out in planning policy.</p> <p>84. Low traffic neighbourhoods are referred to in Principle 2.1.3. Principle 5.10 outlines aims to reduce car dominance and prioritise pedestrians and cyclists. Parking standards are beyond the scope of the Strategic Design Guide and are covered under a separate SPD.</p> <p>85. This intent is captured within the Strategic Design Guide.</p> <p>86. This level of detail is beyond the scope of the Strategic Design Guide. Under 'Additional Guidance' reference is made to Roads in Hertfordshire: A Design Guide.</p> <p>87. This intent is captured within the Strategic Design Guide.</p>
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<p>88. Existing and future neighbourhoods need to be at densities which support sustainability but without compromising minimum standards of open space, internal space standards or space for sustainable movement.</p> <p>89. The terms 'walkable' and 'low traffic' are not defined.</p> <p>90. Sustainable development is not car dependency – this should be made explicit and some measure of it agreed</p> <p>91. 6.2.2 - The requirement for balconies should apply for all apartments.</p> <p>92. Page 23. Surely 'all places' not just 'new' places?</p> <p>93. 8.1.3 – what does 'route towards' mean exactly?</p> <p>94. 8.2.2 – Delete 'wherever possible' as we must not import trees.</p> <p>95. 8.4.2 – 'maximum' is meaningless in this context. There seems to be denial about local water issues and the likelihood that new development will have a serious</p>	<p>88. The Council acknowledges this comment, which is supported in the Strategic Design Guide.</p> <p>89. The established concept 'low traffic' is explained within the guidance documents referenced under 'Additional Guidance'. 'Walkable' is to be determined on a site-by-site basis and with reference to guidance.</p> <p>90. Defining targets for a reduction in car dependency is outside of the scope of the Strategic Design Guide.</p> <p>91. The document text will be updated to reflect this comment.</p> <p>92. The document text will be updated to reflect this comment.</p> <p>93. The document text will be updated to clarify 'route towards'.</p> <p>94. The document text will be updated to reflect this comment.</p> <p>95. The Strategic Design Guide deals with SuDS extensively under Principle 8.3.</p>
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<p>impact on chalk streams. A whole section devoted to SuDS, community-wide rainwater harvesting and storage is needed.</p> <p>96. Page 31 – the potential for e-bikes, cargo bikes and e scooters and providing for them has been overlooked.</p> <p>97. 10.2 – Long term stewardship is critical but this section needs strengthening and is simply too vague.</p>	<p>96. The Strategic Design Guide does not seek to provide a fully comprehensive list for future developments. In terms of urban design, e-bikes have similar requirements to bikes.</p> <p>97. The Council acknowledges this comment and will consider it as part of forthcoming stewardship guidance.</p>
<p>3. Dacorum Heritage Trust</p> <p>98. 4.5 – As well as people, ecology also needs connectivity via blue and green infrastructure. E.g. New built areas need to ensure that they do not cut off natural pathways for both aquatic and terrestrial fauna.</p> <p>99. Section 6 should consider home-working giving the ongoing COVID-19 pandemic.</p> <p>100. 8.3 should include permeable hard standing. SuDS are mentioned but not provision for their maintenance.</p>	<p>98. These elements are covered in Principle 8.2.3.</p> <p>99. This suggestion is already included within the Strategic Design Guide.</p> <p>100. Both permeable hard standing and provision for the maintenance of SuDS are included in Principle 8.3.</p>

<p>William Homes LLP</p> <p>101. St William question whether there is sufficient clarity regarding the application of the Design Principles to smaller and medium sized sites.</p> <p>102. The Draft SPD is overly focused on ensuring that development is in keeping with the character and built form of the surrounding area.</p> <p>The Draft SPD should also recognise that new development can accentuate the sense of place, streetscape and quality of the surrounding built environment and should not seek to stifle architectural ambition or high quality design.</p> <p>The Draft SPD acknowledges the diversity of the Borough's built environment but fails to promote this sense of diversity in new development, instead focusing on new development replicating existing.</p> <p>The Council should ensure that Design Principle 1.3 is expanded upon to ensure that architectural ambition can be explored whilst simultaneously respecting the district's character.</p> <p>103. Design Principle 1 fails to fully consider circumstances where the existing built environment is of a poor quality.</p>	<p>101. There is scope for development of all scales to contribute to achievement of the Strategic Design Guide principles. Dacorum Design Principles (page 4) explains how the Strategic Design Guide should be applied to development of all scales. Dacorum will be producing further guidance specifically aimed at issues relating to smaller and medium sized sites.</p> <p>102. The Strategic Design Guide does encourage high quality contemporary architecture and incorporates flexibility to enable this. This should always be achieved in a way that complements the surrounding context.</p> <p>103. As well as responding to the local context within its design, development must also meet all of the design principles that ensure high quality. Response to context is not limited to the built environment, refer to Part 1, Design Process.</p>
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<p>104. The Land Use Framework guidance is clearly only applicable to developments of a certain size.</p> <p>105. Design Principle 2.2 should clarify that a mix of land uses may not always be possible or appropriate; reference should be made to the Site Allocation.</p> <p>106. It may not always be possible to provide “Intergenerational living opportunities” within a specific development site. It should be clarified that this Design Principle should be applied at a neighbourhood level, rather than a site specific level.</p> <p>107. Design Principle 3.4 should recognise that it may not be possible or appropriate to provide “Exciting multi-sensory play spaces for children and young people of all ages” across all developments.</p> <p>108. DP 4.2 should recognise that it would not be appropriate to provide retail and office uses on all sites, especially where there is a more pressing need for the delivery of new homes.</p> <p>109. Design Principle 4.5.2 should clarify that blue infrastructure is not required on every site, but rather at neighbourhood level.</p> <p>110. Design Principle 7.4 - the provision of indoor and outdoor sports facilities should be commensurate with the size of the development and consider the viability of providing such facilities.</p>	<p>104. The document will be updated to clarify in the introduction to this chapter that this applies to larger scale developments.</p> <p>105. The document text will be updated to include ‘According to Local Plan policies’.</p> <p>106. The Council considers that homes should be accessible to all. The ‘comply or justify’ principle that underpins the Strategic Design Guide provides flexibility.</p> <p>107. The ‘comply or justify’ principle that underpins the Strategic Design Guide provides flexibility.</p> <p>108. The ‘comply or justify’ principle that underpins the Strategic Design Guide provides flexibility.</p> <p>109. The document text will be updated to reflect this comment.</p> <p>110. The document text will be updated to reflect this comment.</p>
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Key points raised in representations

Officer response

111. Design Principle 7.5.2 – This should only occur where appropriate and where there is an evidenced demand.

111. This is implicit in the wording that states ‘excessive noise’.

<p>Tring Town Council</p> <p>112. Unlike Part 3, Part 2 is not strong on renewable energy given the very strong emphasis on design layout of housing needing to reflect the traditional layout.</p> <p>113. The layouts shown in the section on Spatial Typologies often mitigate against effective renewable energy via solar PV and solar thermal on about half the houses and in some cases may well mitigate against Passivhaus standard, where spacing between adjacent rows is very important.</p> <p>114. Para 5.2.5 - Consider omitting "all", because what about bus access, waste/recycling truck access, emergency vehicle access.</p> <p>115. Para 5.11.5 exacerbates the above by providing for cars parking on the pavement.</p> <p>116. Para 5.2.5 is also incompatible with para 5.11.2 and the use of on-street parking, unless on-street parking is allowed only in bays.</p> <p>117. Para 5.11.4. Car park surfaces should also be to SUDs standard</p> <p>118. Charging facilities should be provided to encourage adoption of electric local delivery vehicles and buses.</p> <p>119. Para 8.7.1 What's discussed here is expressed more clearly in Part 3 para E.05.1. Orientation of houses to</p>	<p>112. The Council acknowledges this comment and will consider it further.</p> <p>113. The layouts shown in Spatial Typologies are indicative only.</p> <p>114. The document text includes 'minimum width possible', to provide for access for these type of uses where required.</p> <p>115. Principle 5.11.5 does not encourage the provision of parking on the pavement.</p> <p>116. Principle 5.2.5 considers carriageway width, which is a separate issue to that of parking bays dealt with under Principle 5.11.2.</p> <p>117. The guidance within Principle 8.3.4 applies here.</p> <p>118. Charging points are already included within the Strategic Design Guide, in Principles 6.1.3 and 8.6.3.</p> <p>119. The document text will be updated to reflect this comment.</p>
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Key points raised in representations	Officer response
<p>achieve what's proposed here needs stating, plus specific distances from other buildings to avoid roof shadowing (which significantly reduces the performance of roof mounted solar PV)</p> <p>120. Adaptation should surely apply both ways e.g. houses to make them easily adaptable for staying in as occupants become disabled/unsteady on feet/difficulty with stairs.</p>	<p>120. This comment is addressed in Principle 6.4.3.</p>
General points raised	

<p>Climate Emergency</p> <p>121. Multiple consultees raise the point that all new homes should have solar panels installed given this is much cheaper than retrofitting.</p> <p>122. Landscaping, tree-planting and enhancing biodiversity and habitats need to be prioritised in mitigating the effects of pollution and offsetting climate change.</p> <p>123. Multiple responses suggested that local building materials should be prioritised.</p> <p>124. 8.6 should mention the opportunistic extraction of minerals for use on site prior to non-mineral development.</p> <p>125. 8.6.3 Sorry, this is NOT the thing to do. You can only get the slow charging from a street light, it's unreliable and you could have the circuit feeding multiple lights all going out at the same time. Street lights are not metered and power use is estimated - HCC would end up supplying a few people free electricity with the added cost of frequent blackouts. Far better to facilitate home charging supplemented by fast chargers in car parks.</p>	<p>121. Solar panel installation is considered under Principle 8.7.</p> <p>122. These elements are included within the Strategic Design Guide.</p> <p>123. Principle 8.6.6 refers to 'source low carbon and locally sourced materials for construction with 25% of materials to be recycled'.</p> <p>124. This level of detail is beyond the scope of the Strategic Design Guide.</p> <p>125. The document text will be updated to reflect this comment.</p>
<p>Car Parking</p>	

Question Number 2 NOT SUPPORTING

Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

Key points raised in representations

Officer response

- 126. There should probably be greater recognition of the fact that even people with a garage rarely use it nowadays to house their vehicle/s. What can be done to encourage a return to the use of garages for vehicle storage? Better sizing - and provision of integral electric car charging points?

- 127. 5.10.2 should take into account modern traffic calming measures like low profile speed tables across most of the road (apart from cycle channels at edges). Tring example - the speed cushions in Grove Road (30 mph max) do work but have given rise over the years to many complaints, but the new speed tables in the Christchurch Road (20 mph max) have been well accepted with (after a year) no complaints at all and are also effective as reminders.

- 126. Guidance on storage is outlined under Principle 6.5. The provision of better internal storage aims to address the concern raised within the comment.

- 127. This level of detail is beyond the scope of the Strategic Design Guide.

Question Number 2 NOT SUPPORTING	
Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
Key points raised in representations	Officer response
Housing	
128. The design principles by necessity reflect an evolution of design over several centuries which is reflected in buildings constructed from materials used at that particular time. This cannot be effectively replicated by modern developers building new constructions from latest materials to 21st Century standards and regulations. Any resulting development will not therefore be "sympathetic".	128. This concern is addressed by Part 2 Design Principles Category 1, A Distinctive Place. It should be noted that to be sympathetic, a design does not need to replicate historical design.
129. One consultee raised concerns as to the amount of high density development which will be permitted.	129. The density of development forms part of planning policy and is beyond the scope of the Strategic Design Guide.
130. Housing development is not just about the broader setting of a property as per the document. It is about the quality and design of the property itself and its relative proximity to other dwellings.	130. This level of detail is beyond the scope of the Strategic Design Guide, the Council will consider this further in future development guidance.
131. "Storage" needs to ensure garages are wide enough for people to be able to comfortably get in and out of cars in the garage - or the garage WILL end up being a store shed as per usual!	131. This level of detail is beyond the scope of the Strategic Design Guide.
132. 6.7 "Utilities" 6.6.3 (sic) meters are moving to become "smart" and capable of being read remotely.	132. The Council acknowledges this comment.

Transport

133. (4.7) Sustainably Connected - could be expanded by reference to cycle parking and e-bike charging at appropriate points along main bus routes (for multi-mode journeys e.g. cycle to get bus to station) and also by reference to taxi park/pick up points with EV top up facilities - but good to see 4.7.6 envisages pod access (if that ever happens).

134. 5.10 Reduce car dominance needs amplifying. Speed limits of 20 mph are needed for all residential areas and past schools. Estates need to be built with increased power supplies. Public charging points for cars and e-bikes need to be provided in at least 50% of public car parks and enough electrical capacity for homes to be able to instal home chargers for cars and e-bikes.

135. 5.10.2 should take into account modern traffic calming measures like low profile speed tables across most of the road (apart from cycle channels at edges). Tring example - the speed cushions in Grove Road (30 mph max) do work but have given rise over the years to many complaints, but the new speed tables in the Christchurch Road (20 mph max) have been well accepted with (after a year) no complaints at all and are also effective as reminders.

133. Cycle parking is covered within Principle 7.2. Additional detail is to be provided in transport strategies/guidance.

134. These comments are beyond the scope of the Strategic Design guide.

135. This level of detail is beyond the scope of the Strategic Design Guide.

Lighting

136. One consultee noted there was little reference to lighting within the SPD and made a number of suggestions to be considered for addition:

Chapter 3 (3.3.7) - "adequate lighting to complement the way-finding strategy at night-time and to provide the required sense of safety and comfort, particularly to rest areas".

Chapter 3 (3.4.4) - "A considered lighting strategy that goes beyond minimum statutory street lighting levels and includes layers of landscape, accent and kinetic lighting. Luminaires of suitable type and colour appearance to be adopted to distinguish play areas and make them comfortable and inviting"

Chapter 4 (4.3.5) - "A lighting strategy with a hierarchy of adequate luminaire types, illuminance levels and colour appearances to complement the design aim of improving legibility and enhancing local character and distinctiveness."

Chapter 5 (5.4.2) – Make reference to landscape, accent, façade, and ambient lighting so that such aspects are considered by developers.

Chapter 7 – Make reference to a considered lighting strategy as key to fulfil the vision of safe walking, cycling routes, play areas, and a consideration for light pollution.

136. The Council acknowledges these comments and will consider them further comments as part of future development guidance. Reference to 'well-lit' streets and public spaces will be added to the Strategic Design Guide.

Question Number 2 NOT SUPPORTING

Question Text: Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

Key points raised in representations

Officer response

Chapter 8 8.6.2 - "LED street lighting throughout"

Chapter 8 - Automatic presence detection with a change in intensity can be more desirable than keeping lighting on all night or turning it off overall (as this would prevent safe pedestrian circulation at night as well as potentially making crime and theft easier)

Chapter 8 - Light pollution, the colour appearance of light sources and again the control of intensity should also be considered in relation to biodiversity and protection of wildlife.

Chapter 9 and 10 – A consideration for the multiple technological uses of lighting poles. An integrated approach should be considered as preferable to installing different technologies on multiple separate poles or retrofitting them on a pole that did not have allowance for them in the first place.

<p>Gardens</p> <p>137. More comment should be made on minimum garden size for units and consistency in streets. Reference is made, but greater clarity will help avoid disputes.</p>	<p>137. The Council acknowledges this comment and will consider it further within future development guidance.</p>
<p>Food Production</p> <p>138. "Food Production". Sorry, whoever wrote that has never tried to grow vegetables. It's REALLY difficult and the season is short. Plus you need lots of space. Not practical.</p>	<p>138. Food production in public realm spaces has been shown to offer health and wellbeing and environmental benefits, and represents best practice in new development.</p>
<p>Enforcement</p> <p>139. Because this is a 'guide' some consultees felt concerned that developers will ignore it in favour of profit, risking damage to the character of the local area.</p>	<p>139. The Design Process and Principles are referenced in the emerging new Local Plan policy to aid enforcement.</p>
<p>Flexibility</p> <p>140. One consultee expressed concern regarding the SPD's scope for flexibility. How do you ensure that these principles will be flexible with changing standard? E.g. move from gas boilers to heat pumps later this decade?</p>	<p>140. The 'comply or justify' principle that underpins the Strategic Design Guide provides this flexibility.</p>

<p>Comments on the text itself</p> <p>141. Too long and difficult to engage with.</p> <p>142. There are loads of examples of 'little boxes' that are uniform and probably not in keeping with the neighbourhood and landscape they are placed in. Page 6 is one such example.</p>	<p>141. The Council acknowledges this comment and will consider it going forward.</p> <p>142. The examples included were selected by the appointed consultant based on their expert knowledge of schemes, and represent UK best practice in contextual design.</p>
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Statutory not Supporting

1. Berkhamsted Town Council
2. Nash Mills Parish Council
3. Tring Town Council

Other Groups not supporting

1. Herts & Middlesex Wildlife Trust
2. Dacorum Environmental Forum Waste Group
3. W. Lamb Ltd
4. The Hertfordshire Society
5. Dacorum Heritage Trust

Question Number 3 SUPPORTING	
Question Text: Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
Number of responses 61, Y – 33%, N – 28%, No response – 39%	
Key points raised in representations	Officer response
<p>Canal and River Trust (CRT)</p> <p>77 CRT support the Employment Design Guide but recommend that some design elements are made to protect canals and waterways. Namely:</p> <ul style="list-style-type: none"> • Shed type developments are not built close to edge of canals or towpaths. • Security fencing to be set back with landscaping that is accessible from both sides. • Employment uses to provide access to towpath if possible. • Security lighting should not light towpath or waterspace. 	<p>1. To be addressed by including the Canal and River Trust’s guidance ‘Great Waterside Places’ within the ‘Additional Guidance’ list in Part 2, page 7.</p>
<p>Tring Town Council</p> <p>78 E.06.3 should include “repair shops”.</p> <p>79 E.07.2 should include “public transport links to nearest mainline rail station”.</p> <p>80 E.08.1 electrical parking bays should be at “all employment units”.</p>	<p>2. The document text will be updated to reflect this comment.</p> <p>3. The document text will be updated to reflect this comment.</p> <p>4. This provision is a matter for the Council’s Parking Standards Supplementary Planning Document, this reference will be added to the document text.</p>
General points raised	

Question Number 3 SUPPORTING	
Question Text: Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
Number of responses 61, Y – 33%, N – 28%, No response – 39%	
Key points raised in representations	Officer response
5. One consultee in support of the SPD suggested that DBC should explore higher density development to reduce pressure on surrounding green space.	5. This comment is beyond the scope of the Strategic Design Guide.

Statutory Supporting

1. Tring Town Council

Other Groups Supporting

9. Herts & Middlesex Wildlife Trust
10. Sport England
11. Canal and River Trust
12. Grove Fields Resident Association
13. Wendover Arm Trust

Question Number 3 NOT SUPPORTING	
Question Text: Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
Key points raised in representations	Officer response
Berkhamsted Town Council (BTC) 14. The design priorities need to be clearer. Enhancing the natural environment, achieving zero carbon, and avoiding air, noise, and water pollution should be prioritised before external designs.	6. The design priorities listed are explored within Part 2, Design Principles, which are applicable to employment areas.

Question Number 3 NOT SUPPORTING	
Question Text: Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
Key points raised in representations	Officer response
<p>Nash Mills Parish Council (NMPC)</p> <p>15. Questions surrounding the viability of employment land given the current COVID-19 situation and the potential long-term implications of home-working. Could these proposed employment buildings be easily changed to residential, for example?</p> <p>16. Encouraging people to cycle to work will require a wider cycle network across Dacorum – one that is more accessible and safe.</p>	<p>7. The Council recognises that buildings are, and should remain, flexible. However, a change to residential use undermines the policy objectives of employment areas.</p> <p>8. The Council acknowledges the comment. Hertfordshire County Council is responsible for the Borough wide cycle network.</p>
<p>The Hertfordshire Society (THS)</p> <p>9. THS does not agree with separate design guides for employment and residential land. A mixed-use design guide should be the central focus, particularly given the seismic shifts of the Covid-19 pandemic.</p> <p>10. The provisions outlined in E.03.3 require quantification or reference to environmental standards.</p> <p>11. THS query whether harvesting rainwater should be integrated into water-using functions within a site.</p>	<p>9. The Strategic Design Guide includes mixed use, and general design principles which apply to both residential and employment areas. However, it is important to note that employment units do have specific design needs that require additional guidance.</p> <p>10. These types of provisions would be assessed and quantified on a site by site basis. The setting of environmental standards is a matter for Local Plan policy.</p> <p>11. The Council acknowledge this comment. This type of measure would be assessed in detail for each site prior to implementation.</p>

Question Number 3 NOT SUPPORTING	
Question Text: Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
Key points raised in representations	Officer response
General points raised	
Existing Employment Land 12. A number of consultees noted that there are already a number of unused office spaces within the Borough and questioned the need for more to be built.	12. It is not within the scope of the Strategic Design Guide to allocate land for development.
Enforcement 13. Because this is a 'guide' some consultees felt concerned that developers will ignore it in favour of profit, risking damage to the character of the local area.	13. The Design Process and Principles are referenced in emerging new Local Plan policy to aid enforcement.
Impact of Covid-19 14. Multiple consultees raised the issue of the ongoing pandemic and questioned whether elements of the SPD may need to be updated or rethought.	14. The Council acknowledges this comment, however the full impact of COVID-19 will not be known for sometime, and at present there insufficient evidence to rethink the Strategic Design Guide.

Question Number 3 NOT SUPPORTING	
Question Text: Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
Key points raised in representations	Officer response
<p>Climate Crisis</p> <p>15. When referring to electric vehicles, two consultee felt that installing charging points in “key areas” was too vague. Instead the consultees suggested that they should be installed at every new employment facility.</p> <p>16. The use of thermal mass and computer controlled ventilation could also be included to avoid need for air conditioning.</p> <p>17. The Crown Estate raised concerns about the use of green roofs on commercial buildings as they would compromise viability.</p>	<p>15. This provision is a matter for the Council’s Parking Standards Supplementary Planning Document, this reference will be added to the document text.</p> <p>16. This level of detail is beyond the scope of the Strategic Design Guide. The Council acknowledge this comment and will consider it within future development guidance.</p> <p>17. The ‘comply or justify’ principle that underpins the Strategic Design Guide provides this flexibility.</p>
<p>Infrastructure</p> <p>18. Not enough consideration is given to footpath access.</p> <p>19. General concerns about transport infrastructure to support the new employment land were raised by multiple consultees.</p>	<p>18. The Part 2 Design Principles on pedestrian prioritisation are applicable to employment uses.</p> <p>19. These elements are beyond the scope of the Strategic Design Guide and would be considered by the Infrastructure Delivery Plan and Development Management process.</p>

General comments on the text itself	
20. Page 20 – presumably supposed to say ‘car bans’?	20. ‘Car barns’ are a particular type of parking solution.
21. Paragraph E.06.3 should include “repair shops”.	21. The document text will be updated to reflect this comment.
22. Paragraph E.07.2 should include “public transport links to nearest mainline railway station.”	22. The document text will be updated to reflect this comment.
23. E.01.1 needs to include sustainable connects between employment and residential land.	23. This is included in A Well Connected, Integrated Place (p18)
24. E.02.2 needs to emphasize pedestrian, cycle and public transport routes.	24. The document text will be updated to include public transport routes.
25. Pages 24, 25, 28 and 29 – guidance needs to be linked to standards provided in Roads in Hertfordshire: Design Guide.	25. This reference is included in Part 2 Design Principles which is applicable to employment uses.
26. Page 4 diagram is unclear as to what applicants should achieve.	26. The diagram on page 4 illustrates the scope of Part 3: Employment Uses and is not intended to set out what should be delivered/achieved.
27. E.02.4 – sports provision is not embedded in the LEHH because of physical constraints as concentration of people is prohibited.	27. The Strategic Design Guide is not site specific and does not replace an assessment of individual sites and their constraints.
28. Page 24 diagrams are not representative of modern industrial units.	28. These are included as diagrammatic representations and should only be considered as such.

Question Number 3 NOT SUPPORTING	
Question Text: Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
Key points raised in representations	Officer response
<p>29. Page 25 a strategic approach to servicing contains prescriptive dimensions that are wrong, suggesting that service yards would operate on a 27m depth and are enclosed. This is incorrect.</p> <p>30. Page 25, Reference to social hubs is potentially misleading: Buildings are required to function to the end user operations and so the guidance should not be limiting how each unit can be set out.</p> <p>31. Page 26 (Industrial Units): best practice examples. Examples used are overly bespoke, and not representational of best practice within large industrial units.</p> <p>32. Page 27 (Parking and Servicing) Parking on roofs is not considered good practice. Whilst it is possible, it should not be within the design toolkit, and is more aligned to an urban location where space is tight.</p>	<p>29. The document text will be updated to be less specific in order to emphasise that this is indicative only.</p> <p>30. The ‘comply or justify’ principle that underpins the Strategic Design Guide provides flexibility.</p> <p>31. The ‘<i>Best practice</i>’ examples in Part 3 are intended to be aspirational and inspire creative solutions.</p> <p>32. The Council considers parking on roofs may be appropriate in some settings.</p>

Statutory not Supporting

1. Berkhamsted Town Council
2. Nash Mills Parish Council

Other Groups not supporting

1. The Hertfordshire Society

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response

<p>Deputy Town Clerk of Berkhamsted Town Council</p> <ol style="list-style-type: none"> 1. The “pre-existing context of a site” should include pre-existing topography and landscape to determine scale, shape and design of development. 2. Co-location of industry and residential must take into consideration the issue of poor air quality. 3. How are retirement villages and housing for elderly people incorporated within the aspiration for intergenerational living? 4. The SPD must clarify the balance between visual connection and distinct identity of separate settlements. 5. The SPD needs to set out a solution for connectivity issues between ‘hilly areas’. 6. An increase in ‘street trees’ is welcomed but it does contradict DBC’s current (unofficial) moratorium on street trees. 7. SPD should consider the prohibition of paving over gardens. 8. SPD should consider neighbourhood parking areas rather than individual parking spaces. 	<ol style="list-style-type: none"> 1. These elements are already included within Part 1 of the Strategic Design Guide. 2. This is covered by Part 2: Design Principle 2.2.4 which includes ‘minimise adverse impacts from co-location of uses’. 3. This is covered by Part 2: Design Principles 3.1.1 and 3.1.2 which include housing for elderly and location. The Strategic Design Guide does not encourage retirement villages. 4. In the Strategic Design Guide, visual connection refers to legibility within settlement and to landscape. It does not refer to visual connection between discrete settlements. 5. This is beyond the scope of the Strategic Design Guide and is for designers to achieve. The document text has been updated to include reference to overcoming topography in active travel routes in Design Principle 4.7.5 6. Management policy for trees along the highway is set by Hertfordshire County Council. 7. This comment is beyond the scope of the Strategic Design Guide. 8. This provision is a matter for the Council’s Parking Standards Supplementary Planning Document.
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Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>9. SPD fails to mention storage for bikes.</p> <p>10. With regards to Climate Crisis, the SPD should take into consideration previous comments regarding paving over gardens. This section also does not mention the ground itself as a carbon store, nor mention of preservation of wetlands as essential habitat. Again, this section should also mention wildlife corridors.</p> <p>11. What is DBC's industrial and economic strategy in response to climate change and adverse weather? Policy should be based on this.</p> <p>12. Post-Covid19 In relation to ongoing issues surrounding the pandemic, should the SPD prioritise the use of shared office and co-working spaces?</p> <p>13. How will the guidelines set out within the SPD be enforced?</p>	<p>9. Cycle storage is covered through Part 2: Design Principle 7.2.</p> <p>10. Wildlife corridors are addressed through Part 2: Design Principle 8.2.3. The document text has been updated to include reference to wetlands in 8.2.</p> <p>11. This is beyond the scope of the Strategic Design Guide.</p> <p>12. Flexibility in design to accommodate changing work patterns is included in Part 2: Design Principle 6.1.3 which includes home working and Part 3: Employment Uses Principle 6.1.3.</p> <p>13. The Design Process and Principles are referenced in emerging new Local Plan policy to aid enforcement. The relationship between the Strategic Design Guide and planning process is set out in Part 1: Design Process page 8.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Sport England (SE)</p> <p>14. Supportive of the SPD. SE offer their support with regard to advocating co-location of land uses. Suggestion that 'walking and cycling' to areas of open space should be included as one of the 'matters to consider'.</p> <p>15. SE request that their Active Design Principles are listed in the SPD's 'Additional Resources'.</p> <p>16. The 'comply or justify' approach is welcomed however there is concern as to how the Council will assess compliance in the absence of a systematic approach to their expectations at the planning stage. SE suggest including a pre-populated checklist as part of the submitted Design and Access Statement that requires developers to discuss their compliance or justification.</p>	<p>14. This point is covered through the inclusion of Connectivity in Part 1: Design Process checklist for 'Evaluating Place', page 53.</p> <p>15. The document text will be updated to reflect this comment.</p> <p>16. The Strategic Design Guide provides a checklist to be used by case officers to assess compliance at the pre-application stage.</p>
<p>Canal and River Trust (CRT)</p> <p>17. CRT raised concern surrounding the impact upon local canal and waterway corridors. They suggest that design codes should include an assessment of the visual impact from the canal corridor and set out clear design principles that limit any adverse visual impact.</p>	<p>17. Visual impact is considered extensively in Part 1: Design Process, 'Observing: Visual Exposure, Enclosure and Shelter, page 23.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Grove Fields Resident Association</p> <p>18. Concern raised regarding potential development of greenbelt land on Grove Road. Suggestion that a 'community park' would be a better use of this space.</p> <p>19. Concern raised about the economic potential for any new commercial premises built as part of a development given that other local facilities have closed.</p> <p>20. Concerns about vehicular entrances and exits onto Grove Road and Bulbourne Road also raised.</p>	<p>18. This point is beyond the scope of the Strategic Design Guide.</p> <p>19. This point is beyond the scope of the Strategic Design Guide.</p> <p>20. This point is beyond the scope of the Strategic Design Guide.</p>

<p>Nash Mills Parish Council</p> <p>21. In reference to landscape edges, are there any standards (e.g spatial standards, number of trees) for edges between residential developments and major roads?</p> <p>22. Accommodating potential future changes in lifestyle and movement patterns should not minimise current parking requirements.</p> <p>23. Was the draft parking strategy from last year adopted?</p> <p>24. Can it be clarified what is meant by prioritising people first and private car users second?</p> <p>25. Cars dominating the public footway can only be addressed if developments have sufficient parking provision.</p> <p>26. Maximising space. There is no internal space requirement noted.</p> <p>27. Should the SPD also include specification to ensure that garden space is commensurate with the number of inhabitants?</p> <p>28. Cyclist safety provisions on major roads such as the A414 are lacking.</p> <p>29. Potential to encourage use of electric cars is not mentioned specifically.</p>	<p>21. Edges and trees are to be considered per application on a site-by-site basis.</p> <p>22. This is within the scope of the Car Parking Supplementary Planning Document and not the Strategic Design Guide.</p> <p>23. The Council adopted the Parking Standards Supplementary Planning Document in November 2020.</p> <p>24. As stated in Principle 7.1, the aim is ‘to deliver attractive cycle and walking routes which protect cyclists and pedestrians from traffic’.</p> <p>25. This is within the scope of the Car Parking Supplementary Planning Document and not the Strategic Design Guide</p> <p>26. Principle 6.4.3 refers to national minimum space standards.</p> <p>27. Setting standards for garden space is beyond the scope of the Strategic Design Guide.</p> <p>28. The Council acknowledges this comment.</p> <p>29. Part 2 Design Principles 8.6.3 and 6.1.3 explicitly mention electric vehicle charging.</p>
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Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>30. Does the SPD only apply to larger developments?</p> <p>31. Limited consideration of impact of increased population growth upon the current infrastructure, namely school places.</p> <p>32. Mixed-use developments are well intentioned. But community and commercial facilities are often removed in later iterations of plans. Will this SPD ensure that this cannot happen in future?</p> <p>33. Will the LPA be able to reject developments if it fails to meet the criteria set out in this SPD?</p>	<p>30. Part 1, Design Process, page 6 states: 'This guide outlines Dacorum's strategic design expectations and a design process which should be used to achieve these through new development of all scales'.</p> <p>31. Infrastructure and land use considerations are made within Part 1, Design Process. Further specificity would be expected with each individual application.</p> <p>32. Development Management processes (outlined in Part 1, Design Process, page 8), are in place to enforce policy and the Design Process and Principles are set out in emerging new Local Plan policy.</p> <p>33. The guide is underpinned by the 'comply or justify' principle which would be used to assess applications.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Wendover Arm Trust (WAT)</p> <p>34. In welcoming the SPD's reference to the Grand Union Canal, WAT would like to see a similar reference to the Wendover and Aylesbury Canals which run through the borough.</p> <p>35. Similarly, when referring to the historic significance and legacy of the area, WAT suggest that specific reference should be made to Dacorum's canal heritage.</p> <p>36. Increasing biodiversity and enhancing green spaces to promote health and wellbeing can be achieved through restoration of the canals, something which WAT have already begun to do with the Wendover Canal.</p>	<p>34. The document text will be updated to reflect this comment.</p> <p>35. The document text will be updated to reflect this comment.</p> <p>36. This comment is too site specific for the Strategic Design Guide. The Strategic Design Guide refers to both 'Green and blue' infrastructure with respect to biodiversity, which includes water features.</p>

Hallam Land Management (HLM)

37. HLM raise an issue with the SPD's reference to family-sized dwellings in 6.4.2: "Typically these houses already meet the minimum GIA sizes in NDSS and we can see no justification for seeking to exceed the standard. Affordability of housing in Dacorum will not be helped by making family houses larger, more expensive to build and more expensive to purchase."

38. Paragraph 6.5.1 indicates that built-in storage provision should comply with the areas set out in the NDSS. Our comments in respect to Para 6.4.3 apply and increasing built-in storage will necessitate an increase in dwelling floorspace which will make homes more expensive to purchase. Reference to NDSS should be removed.

39. Paragraph 6.6.4 requires that flues and service risers should not appear on principal façades. In some cases this will simply not be possible- one example being mid-terrace homes. The aim to reduce flues and service risers on key elevations is supported but the wording needs to be more flexible to allow for instances where this is not possible. We suggest the wording be amended to state "flues and service risers should generally be avoided on principal façades".

40. Paragraph 8.1.3 places an onus on applicants to demonstrate the route toward achieving zero-carbon homes in their proposals. This guidance does not accord with the provisions of the Deregulation Act 2015 which requires that local planning authorities should not set any additional local

37. Exceeding national minimum space standards for family-sized dwellings is included as a suggestion and is not compulsory.

38. The Council has decided to follow the Nationally Described Space Standards.

39. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.

40. The Strategic Design Guide adds further guidance to the energy and carbon emission standards set by local planning policy.

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>technical standards or requirements relating to construction or performance of new dwellings.</p> <p>41. What is a “bay study” ref in 10.5.1?</p> <p>42. The requirement of 1:20 drawings at planning stage is “excessive”. Is this a typographical error that should be 1:200?</p>	<p>41. The study referred to is a type of elevation drawing.</p> <p>42. This is not an error, the intended scale is 1:20.</p>
<p>Dacorum Environmental Forum Waste Group (DEF)</p> <p>43. To prevent guidelines being circumvented by developers DEF recommend using language like “must” instead of “should”.</p>	<p>43. It is the role of the Local Plan to establish the ‘musts’. The Strategic Design Guide follows a ‘comply or justify’ principle.</p>
<p>Chiltern Society (CS)</p> <p>44. Suggestion that the design guide is used to ‘masterplan’ sites that are to be put forward for the Local Plan. It should be part of the decision process and not an ‘afterthought’.</p> <p>45. Suggestion that there should be some consultation with the wider community on the ‘visioning process’.</p> <p>46. CS would like to see the DBC Design Guide cross referenced with the now published Chilterns AONB Design Guide.</p>	<p>44. The purpose of the Strategic Design Guide is to fulfil this role.</p> <p>45. This is included in Part 2, Design Principle 10.4.</p> <p>46. This document is referenced as an additional resource in Part 1, Design Process, page 36.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>The Hertfordshire Society (THS)</p> <p>47. The SPD presumes allocations within the greenbelt before the Local Plan has been adopted. These areas for growth, THS argue, cannot be supported by sustainable transport corridors or infrastructure.</p> <p>48. The SPD fails to offer a sustainable human well-being strategy that addresses the climate crisis.</p> <p>49. THS argue the SPD focuses too much on the edge of settlement greenbelt sites, more needs to be done, for example, to retrofit existing towns and places.</p> <p>50. SPD lacks priority design objectives. This results in visions for development not matching the build reality on the ground.</p>	<p>47. Each application will be determined against appropriate standards to ensure sustainability through the Local Plan process. The Strategic Design Guide applies to all development including brownfield.</p> <p>48. A wellbeing strategy is not within the scope of the Strategic Design Guide.</p> <p>49. The Strategic Design Guide applies to all development including brownfield.</p> <p>50. All of the design objectives are important. Visions are to be developed as part of the masterplanning process for each site.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Homes England (HE)</p> <p>51. HE suggest that the SPD’s language may be a little too advanced for those who do not have background in planning or development. Where changing the language isn’t possible, HE suggest using hyperlinks within the SPD so that more unusual words (e.g. co-axial field patterns) can be looked up more quickly.</p> <p>52. Another query regarding whether the SPD applies to small sites. If it does it would be useful to see a worked example of a small site with the framework information applied to simpler plans.</p> <p>53. Again, some examples would complement the SPD well. E.g. an access statement that was deemed poor, the types of plans in the appendix etc.</p>	<p>52. The Council acknowledges the comment and will consider it further.</p> <p>53. The Strategic Design Guide applies to sites of all scales. It is beyond the scope of the Guide to provide a worked example.</p> <p>54. This suggestion is beyond the scope of the Strategic Design Guide.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Dacorum Heritage Trust (DHT)</p> <p>55. DHT felt as though the SPD could do more to address climate change and the impact upon local chalk streams which are of international importance.</p> <p>56. The SPD should address:</p> <ul style="list-style-type: none"> • The impact of increased winter rainfall and how this will be dealt with (SUDs, green roofs etc), • Permeable hardstanding, • Increase sewage effluent from new development, • Water efficient white goods, water butts, showers, and low flush toilets, • Garden space which is being increasingly reduced on new-build development sites, • Removal of weirs and sluices in chalk streams and, • The re-wilding of river systems. 	<p>55. The Council acknowledges this comment and will consider it further. The current Biodiversity Action Plan for Hertfordshire is a county level document.</p> <p>56. Increased rainfall is addressed in Part 2, Design Principles 8.3.7 and 8.3.9. SuDS is covered in several parts of the Guide, most notably in Principle 8.3, green roofs in Principle 10.5.2, permeable hardstanding in Principle 8.3.4.</p> <p>Interior aspects (water and sewage), garden size, chalk streams and rewilding are beyond the scope of the Strategic Design Guide.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Tring Town Council</p> <p>57. SPD has not gone far enough in considering how modern trends are blurring the distinction between residence, leisure and work.</p> <p>58. The impact of Covid-19 must be considered.</p> <p>59. Building methods, standards, and infrastructure should not be considered in isolation as they are an integral part of achieving good design.</p> <p>60. SPD should do more to encourage the use of local materials.</p>	<p>57. The items raised are covered within Part 2, Design Principles Categories 6 and 10.^[CC1]</p> <p>58. Part 2, Design Principles include aspects applicable to changes in work patterns and lifestyles arising from COVID-19, including home working, access to green space and active travel.</p> <p>59. The Council acknowledges this comment.</p> <p>60. Sourcing local materials is explicitly referred to in Part 2, Design Principle 8.6.6.</p>
<p>St. William Homes LLP (SWH)</p> <p>61. Parts 1, 2, and 3 are too long and could be condensed. Too much space is dedicated to context and examples.</p>	<p>61. The Council acknowledges this comment.</p>
<p>Thames Water (TW)</p> <p>62. The SPD could include text encouraging developers to contact TW to discuss drainage requirements for their development.</p>	<p>62. The document text has been updated to reflect this comment (Part 1, Design Process, page 56).</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>The Crown Estate (TCE)</p> <p>63. Although a joined up approach between DBC, HGC and SADC is described in Part 1 it is not evident throughout the guidance.</p> <p>64. The bespoke approach to LEHH is not included within the SPD and TCE suggest that it should be to provide consistency across the development.</p>	<p>63. The Guide was developed jointly by DBC and SADC to address this need.</p> <p>64. The document text will be updated to include reference to Hemel Garden Communities' Spatial Vision.</p>
<p>Harrow Estates (HE)</p> <p>65. The guide goes beyond what is currently required by Future Homes Standard. Text should be revised so that these additional standards are described as 'encouraged' and not 'mandatory'.</p>	<p>65. The 'comply or justify' principle that underpins the Strategic Design Guide provides flexibility.</p>
<p>LQ Estates (LQE)</p> <p>66. LQE raise concerns about the SPD's lack of flexibility. Different sites, they argue, will require different approaches and this should be formally recognised within the SPD.</p>	<p>66. The 'comply or justify' principle that underpins the document provides flexibility.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>W. Lamb Ltd</p> <p>67. Some of the design codes would have significant implications on viability but there is no mention of this as being a valid point for justification.</p>	<p>67. The Council does not consider that delivering good design necessary leads to increased costs. Furthermore, those aspects of the Design Code which are to be implemented immediately (through the Cores Strategy) are not considered to add significant additional costs. Those requirements which will not be fully implemented until the new Local Plan is adopted will be viability tested through its preparation.</p>
General points raised	
<p>Comply or Justify</p> <p>69. Multiple responses to the SPD raised concerns surrounding the adoption of the 'comply or justify' approach.</p> <p>70. One response highlighted that the proposed guidelines are not specific enough to make sure that developers comply or justify. Another raised that the SPD's use of language was too vague to enforce this approach. For example, the use of language such as "should" ought to be replaced with "must".</p> <p>71. One consultee questioned who would decide whether the justification was adequate and using what standards?</p>	<p>69. The Council acknowledges this comment.</p> <p>70. It is the role of the Local Plan to establish the 'musts'. The Strategic Design Guide follows a 'comply or justify' principle.</p> <p>71. The justification will be considered as part of the Development Management process.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Infrastructure</p> <p>72. Some specific concerns surrounding the accessibility of Tring train station, its cycle links, inadequate bus timetable and expensive and over-subscribed car park were mentioned.</p> <p>73. With the aspiration to reduce car usage in the coming decades, it was noted that there will be an increased reliance upon public transport. One consultee noted that a specific route linking the stations and Maylands would be particularly useful for both public transport and cycling lanes.</p>	<p>72. The Council acknowledges this comment. Whilst the points are beyond the scope of the Strategic Design Guide, Part 1 Design Processes does include infrastructure and land use considerations.</p> <p>73. The Council acknowledges this comment, however it is beyond the scope of the Strategic Design Guide.</p>
<p>Biodiversity</p> <p>74. Two consultees mentioned that the SPD's current method to measure the biodiversity of wetland is insufficient. They suggest a standard measure of biodiversity should be the definition of more than five species within 1m².</p>	<p>74. The Council acknowledges this comment, however it is beyond the scope of the Strategic Design Guide.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Car Parking</p> <p>75. Much concern was raised about the current standards for car parking in the Borough and the possibility that more housing will exacerbate the issue.</p> <p>76. Two consultees raised concerns over the SPD's decision to base road widths on the ability to park cars on pavements. They argued that this sort of parking was illegal, dangerous and exclusionary.</p>	<p>75. This provision is a matter for the Council's Car Parking Standards Supplementary Planning Document.</p> <p>76. This is not the case, the Strategic Design Guide does not encourage parking on pavements.</p>
<p>Climate Emergency / Net-Zero Carbon</p> <p>77. Some consultees noted that the SPD does not currently recognise that technology already exists to achieve zero-carbon housing.</p>	<p>77. This is not the case; as an example, Passivhaus is one technology referred to in the guidance. The guidance establishes that applicants should meet the Local Plan policy targets for achieving net zero carbon.</p>
<p>Mix of Housing</p> <p>78. Another consultee questioned why the Council are not encouraging the use of old buildings on brown field sites. They argued that new developments risked increasing traffic, overlooking neighbours and damaging habitats.</p>	<p>78. Land for development is allocated by the Local Plan and not by the Strategic Design Guide.</p>

Question Number 4	
Question Text: Overall, do you have any other comments regarding the Draft Dacorum Strategic Design Guide SPD? Y/N	
Key points raised in representations	Officer response
<p>Impact of COVID-19 Pandemic</p> <p>79. Multiple consultees noted that the SPD did not mention the ongoing pandemic. Some questioned whether the SPD was already out of date and needed to reconsider some aspects regarding employment land and mixed-use.</p>	<p>79. Part 2, Design Principles include aspects applicable to changes in work patterns and lifestyles arising from COVID-19, including home working, access to green space and active travel.</p>
<p>Comments about the text itself</p> <p>80. Multiple consultees suggested that the SPD could be condensed.</p> <p>81. One consultee noted there were some general errors including a missing graph and some missing policies.</p> <p>82. A number of consultees suggested that the language used within the SPD was too complex for those who do not have a background in housing, planning or development.</p>	<p>80. The Council acknowledges this comment and will consider it further.</p> <p>81. The document will be reviewed and numbering corrected.</p> <p>82. The Council acknowledges this comment and will consider it further.</p>

Statutory Comment

1. Berkhamsted Town Council
2. Tring Town Council
3. Nash Mills Parish Council

Other Comments

1. Sport England
2. Canal and River Trust
3. Grove Fields Resident Association
4. Wendover Arm Trust
5. Hallam Land Management
6. Dacorum Environmental Forum Waste Group
7. Chiltern Society
8. The Hertfordshire Society
9. Homes England
10. Dacorum Heritage Trust
11. Thames Water
12. St. William Homes LLP
13. The Crown Estate
14. Harrow Estates
15. LQ Estates
16. W. Lamb Ltd

Appendix 5

Appendix 5 - Full text of responses by Consultee and questions in question number order

Draft Strategic Design Guide

ID	DSDG1
Person ID	1144221
Full Name	Miss Penelope Allsop
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	Your talking about a town, Chipperfield is a village and should remain that way, we have over 30 new properties being built in our little village, all along one road which we don't have the infrastructure to cope with...
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	we are a village...
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	there are loads of empty office blocks... why are you building more?
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	No
If yes, please provide you comments along with any supporting information you may have.	
Include files	
ID	DSDG2
Person ID	1148988
Full Name	Mr Alan Church
Organisation Details	
Person ID	
Full Name	

Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	The design principles by necessity reflect an evolution of design over several centuries which is reflected in buildings constructed from materials used at that particular time. This cannot be effectively replicated by modern developers building new constructions from latest materials to 21st Century standards and regulations. Any resulting development will not therefore be "sympathetic".
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	Developers will by necessity be driven by the need to make a profit; this will override aesthetic concerns about constructing buildings which maintain the historic character of the local environment.
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	No
If yes, please provide you comments along with any supporting information you may have.	
Include files	
ID	DSDG3
Person ID	1158506
Full Name	Meenakshi Jefferys
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes	Yes

* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	In view of the pandemic it Should include more cycle paths as more outdoor spaces For exercise. buildings should be carbon neutral and low energy consumption, with opportunity for electric cars to be charged.
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	I am not sure. With Brexit and the pandemic we may have less immigration and shrinking population as well as more people working from home.
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	
If yes, please provide you comments along with any supporting information you may have.	Need to think more of how we will all be living in the future.
Include files	
ID	DSDG4
Person ID	1207345
Full Name	Mr Matt Dodds
Organisation Details	HMWT
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	No

* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	The requirement for the NPPF requirement for development to deliver biodiversity net gain by reference to the Defra biodiversity metric should be more explicitly stated. Currently the guidelines state: '8.2 Enhance biodiversity and Habitats All opportunities for biodiversity net gain, as measured by DEFRA's assessment methodology, have been maximised, preferably on-site or as part of enhancement and expansion of nearby natural habitats. A mitigation hierarchy should be used: 'avoid, minimise, restore and offset.' This should be changed to: Development must deliver measurable biodiversity net gain, by utilising the DEFRA biodiversity metric, preferably on-site or as part of enhancement and expansion of nearby natural habitats. A mitigation hierarchy should be used: 'avoid, minimise, restore and offset'.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	
If yes, please provide you comments along with any supporting information you may have.	
Include files	
ID	DSDG5
Person ID	1207069
Full Name	Mr Gary Stanley
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the	Yes

10 broad categories) will be effective in securing high quality development? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	No
If yes, please provide you comments along with any supporting information you may have.	
Include files	
ID	DSDG6
Person ID	211327
Full Name	Ms Sara Leno
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	I have concerns as to the level of high density which will be permitted.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	Yes

* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?	Yes
* Yes	
* No	
If yes, please provide you comments along with any supporting information you may have.	I am very concerned with the principle of "Comply or justify". All developers should comply. Words like "robust" and "compelling" are used, but who is to determine the criteria for assessing this?
Include files	
ID	DSDG7
Person ID	1248980
Full Name	Mr Giles Clark
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?	No
* Yes	

* No	
If yes, please provide your comments along with any supporting information you may have.	
Include files	
ID	DSDG8
Person ID	1230147
Full Name	Mr Roberto Serra
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	<p>I believe that the design principles are very good overall, but as a lighting expert I have suggestions for a few additions to be considered. In general there is very little reference to lighting and as a matter of fact lighting is essential in ensuring that the overall vision set out in the documents is achieved when daylight is not available.</p> <p>The design guide would benefit from specific mentioning of broad lighting guidelines in a few sections. I mention below some of them:</p> <p>- Chapter 3: "A place for all"</p> <p>3.3 "Ensure all places are accessible to everyone". Without adequate lighting, objectives such as clear wayfinding, safe and comfortable rest areas, etc. may be difficult to achieve in the dark hours. A simple street lighting strategy is likely to be inadequate, as it provides flat illumination without emphasizing or providing adequate feeling of safety and comfort. I would add a point to the design objectives:</p> <p>3.3.7: "adequate lighting to complement the way-finding strategy at night-time and to provide the required sense of safety and comfort, particularly to rest areas".</p> <p>3.4 "Integrate Play". Lighting is key to provide an inviting, comfortable and beautiful setting and to emphasize focal points, features and sensory experiences. I would add a point to the design objectives:</p> <p>3.4.4: "A considered lighting strategy that goes beyond minimum statutory street lighting levels and includes layers of landscape, accent and kinetic lighting. Luminaires of suitable type and colour appearance to be adopted to distinguish play areas and make them comfortable and inviting"</p> <p>- Chapter 4: "A connected place"</p>

4.3 "Be Visually Connected" . I would add a point to the design objectives:

4.3.5 "A lighting strategy with a hierarchy of adequate luminaires types, illuminance levels and colour appearances to complement the design aim of improving legibility and enhancing local character and distinctiveness. "

- Chapter 5: Great Streets and Public Spaces

Lighting is mentioned only in 5.4.2 with reference to Street Lighting. I believe it would be beneficial making reference also to landscape, accent, facade and ambient lighting to trigger the designers to consider such aspects as necessary and complementary to fulfill the vision of great streets and public spaces (spaces with poor or non considered lighting are hardly great). This could be mentioned in the general overview or possibly to chapters 5.1, 5.5 and 5.7.

- Chapter 6. Great Homes

Lighting in homes has been simplistically stuck for too long to the provision of recessed fixed downlights arranged in grids, complemented by a few decorative pendants or wall lights. A vision for great homes need to include a dedicated section on lighting (6.8) to call for a well considered lighting strategy that goes beyond that.

Important aspects to be considered and that could be mentioned include: the colour appearance of the light sources; well considered positioning and aiming of luminaires to enhance vertical surfaces rather than only horizontal ones; if downlights are adopted for accent lighting, these to be directional and with good glare control; the adoption of other types of luminaires and light effects such as linear LEDs integrated in furniture and slots for indirect lighting; variability of the light intensity (use of dimmers and lighting controls); the adoption of specific adequate lighting solutions for people with special needs (care homes, etc.).

- Chapter 7. Active and Healthy

Again, it would be beneficial mentioning a considered lighting strategy as key to fulfill the vision of: safe walking and cycling routes; safe and welcoming activity and play areas; consideration to light pollution.

- Chapter 8. Facing the Climate Crisis

8.6.2 "LED street lighting throughout" - while LED lighting is generally more energy efficient than other light sources, the statement should be expanded to be more comprehensive and prevent designers and developers to just get away with providing some form of LED street lighting. I would suggest making reference not only to street lighting but to good quality LED lighting in general, with adequate glare control and optics and also to the way lighting is controlled in intensity. Automatic presence detection with a change in intensity can be more desirable than keeping lighting on all night or turning it off overall (as this would prevent safe pedestrian circulation at night as well as potentially making crime and theft easier)

Light pollution, the colour appearance of light sources and again the control of intensity should also be considered in relation to biodiversity and protection of wildlife.

Chapters 9 and 10: lighting poles can host multiple technologies such as wi-fi or bluetooth hotspots, security cameras, a variety of sensors to gather information on the surrounding environment (air quality, traffic, etc.). An integrated approach should be considered as preferable to installing different technologies on multiple separate poles or retrofitting them on a pole that did not have allowance for them in the first place.

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	No
If yes, please provide you comments along with any supporting information you may have.	
Include files	
ID	DSDG9
Person ID	490893
Full Name	Mrs christine kavanagh
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	Every effort must be made to invest in safe cycle paths which enable cyclists to use dedicated cycle paths away from traffic. The A4147 between St. Albans and Leverstock Green would be a suitable site for such a cycle path and would provide an important cycling corridor for commuters and leisure cyclists travelling between St. Albans and Hemel Hempstead.
Include files	
ID	DSDG10
Person ID	1142469
Full Name	Mrs Eileen Reece
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	What about infrastructure: schools, doctors surgeries for instance
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	What about infrastructure: schools, doctors surgeries for instance

Include files	
ID	DSDG11
Person ID	1144632
Full Name	Mr Douglas Cousins
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?	No
* Yes	
* No	
If yes, please provide you comments along with any supporting information you may have.	
Include files	
ID	DSDG12
Person ID	1145350
Full Name	Mr Edward Murray
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	

<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>I would like to have seen more comment on enforcement where planning has been agreed and then overstepped/exceeded by owners. Further I would like to have seen some comment on improving and ensuring notifications to neighbours during the planning processes.</p> <p>Having been the victim of not being in receipt of a planning request by a neighbour, I feel the safeguards are not sufficient for neighbours.</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>Whilst, I am particularly pleased to see comment on 6.2.3 with regard to the importance of privacy, 6.5.2 the need for utility rooms on larger houses - perhaps, more comment should be made on minimum garden size for units and consistency in streets. Reference is made, but greater clarity will help avoid disputes.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	
<p>If yes, please provide you comments along with any supporting information you may have.</p>	
<p>Include files</p>	
<p>ID</p>	DSDG13
<p>Person ID</p>	398662
<p>Full Name</p>	Mr Andrew Ray
<p>Organisation Details</p>	
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	

<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>Housing development is not just about the broader setting of a property as per the document. It is about the quality and design of the property itself and its relative proximity to other dwellings. Nobody wants to live in an egg box, but if only egg boxes are available. then people have to live in them - there is no other choice, and that is the real issue in this region.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>If the dwellings themselves are small, badly designed and not fit for their intended purpose, then no amount of aesthetic siting and quality design to fit in will make the people who have to live in them have a good quality of life.</p>
<p>Include files</p>	
<p>ID</p>	DSDG14
<p>Person ID</p>	1145481
<p>Full Name</p>	Mr Brian Kazer
<p>Organisation Details</p>	
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	Yes

<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>It depends on what is meant by "high quality". It will result in development of traditional design. What is less clear is (a) how it will enable building of carbon neutral houses in the face of the Climate Emergency (b) how it will enable use of renewable energy. Regarding (b), for example several of the layouts illustrated in the section on Spatial Typologies, based on historic examples, are not conducive to optimum use of rooftop solar PV or solar thermal, as the majority of house roofs are likely to have a sub-optimal direction for optimum use of these technologies.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>In the main, yes, except for the following points (a) Part 3 para E.08.1, re the future of vehicles which are free of fossil fuels. The proposed installation of EV charging points at "key areas" (which is a vague term), is inadequate, when EV charging points should be installed at every new employment facility, especially given the Govt timescale for phasing out fossil fuel cars. (b) Part 3 para E.06.3 Add "repair shops" (c) Part 3 E.07.2 Add "public transport links to nearest mainline railway station"</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Part 1 Page 17 "Site context of examples of what to observe". Re grassland, in addition to identifying whether alkaline or neutral/acidic, it's important re biodiversity to identify grassland that is species rich (more than 5 species within 1 square metre) Part 1 Page 26 "Public Transport" photo and words. Strengthen "Connectivity to railheads is desirable" by inserting, as a minimum "highly" before "desirable" Part 2 para 5.11.5 Strong concern about apparent proposal to base road widths on ability to park on pavements. Such parking is not only illegal, but is also dangerous especially for Mums with buggies/toddlers; disabled people, elderly people unsteady on feet, all of whom are likely to have to step out into the road when pavements blocked by parking. This para also needs reconsidering in light of practical implications of para 5.2.5 which proposes roads to "minimum width possible" Access of buses? Emergency vehicles? On-road parking?</p>
<p>Include files</p>	

ID	DSDG15
Person ID	1249336
Full Name	Miss Charlene Scott
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	There are some key environmental issues missing. Portions from building , bats habits not being looked into properly, Roman snails and their habits
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	A good selection of structures.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	Since Covid working from home is more frequent so should we not encourage this instead of building office which may stay vacant for a long time
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	Some areas may greatly effect locals with more traffic, overlooking exsisting properties and damage to natural habitats! would not making use of old buildings instead of building new be a more cost effect route?
Include files	
ID	DSDG16
Person ID	1249466
Full Name	Mr Lawrence Stromski
Organisation Details	
Person ID	

Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	It's great to showcase exceptional design from around the country, as the lovely pictures adequately do, but it is quite another thing to enforce good design which is lacking. the hemel hempstead station gateway project is a classic example - land sold off cheap to the developers with minimal criteria. only a few cycle shelters were really considered, but very little was done to reduce car dominance. When designing new areas, the entire area infrastructure needs to be considered, e.g. the No. 500 bus for the gateway project and thought needs to be given in how the development would finance or otherwise benefit the local infrastructure.
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	When considering criteria like the hemel hempstead station re-development - a commercial nirvana filled with chain coffee shops will not satisfy any eco credentials, as milk will be trucked from all over the country as cheaply as possible but in an unsustainable way. Careful thought needs to be given to local supplies, local resources to minimise environmental impact. The old Code 6 standard should be a starting point for new developments, not a top target.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	As with the residential, its nice to showcase the best of design from across the uk, but it is completely different to enforce it and make it happen. Where is the intergrated design in the hemel hempstead industrial area or the kings langley industrial area? Not enough consideration is given to good footpath access and local busses. Land seems to be sold off cheaply and permission given easily for new businesses to quickly generate jobs. So which will take priority, good design and planning or quick jobs?
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	Overall, the three documents can be shorter and much better. There is far too much waffle e.g. pages 21 and 22 of document 1. what does a graph indicating rural, urban, exposure and enclosure even mean? what is the force and effect of such a

	diagram except to state the blindingly obvious and the completely un-changable?
Include files	
ID	DSDG17
Person ID	221857
Full Name	Mr George Bull
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	The draft detailed design principles should be amended to make it clear how they will enable the construction of carbon-neutral dwellings in response to the climate emergency. Further amendments are required to specify exactly how the design principles will support the use of renewable energy. There seems to have been a casual disregard for this. For example, some of the design layouts feature house roofs which are not aligned in a direction to make optimum use of solar PV or solar thermal panels.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	Two changes are required. First, the proposal (Part 3, paragraph E.08.1) to install EV charging points at key areas is inadequate. As we are looking at a future where vehicles do not use fossil fuels, EV charging points should be installed at all new employment buildings. Dacorum's timescale for this must at the very least meet the government's timescale. Second, as Dacorum is served by mainline and suburban trains, Part 3, paragraph E.07.2 should be extended to add public transport links to the nearest mainline railway station.
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes

If yes, please provide you comments along with any supporting information you may have.

In "Site context of examples of what to observe" (Part 1, page 17) the identification of soil type and therefore ecological assemblage as either alkaline or neutral/acidic is inadequate. With biodiversity under threat, it is crucially important to identify grassland that is species-rich. The definition of more than five species within one square metre would be a good starting point.

In Part 2 paragraph 5 the approach to parking seems to be dangerously muddled.

On the one hand, para 5.2.5 proposes that roads should have the minimum width possible. Surely there should be adequate provision for emergency vehicles and public transport? On-road parking is also an issue. There is a compelling case for insisting that developments of buildings to accommodate more than one family can only be constructed if adequate off-road (possibly underground) parking is provided.

On the other hand, para 5.11.5 seems to base road widths on the ability to park vehicles on pavements. Such parking forces pedestrians to walk along the road. This exposes the elderly, the disabled and parents with young children to particular risks. This is illegal and therefore cannot be included in the Strategic Design Guide.

Include files

ID DSDG18

Person ID 772477

Full Name Mr. Roy Warren

Organisation Details Planning Manager
Sport England

Person ID

Full Name

Position

Company / Organisation

Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?
* Yes
* No

Yes

If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.

Include files

Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?
* Yes
* No

Yes

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

See comments below on how the detailed design principles could be enhanced.

Include files

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?
* Yes
* No

Yes

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

See comments below on how the detailed design principles could be enhanced.

Include files

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?

- * Yes
- * No

Yes

If yes, please provide you comments along with any supporting information you may have.

Part 1 – Design Process

Land Use Framework

Support is offered for advocating the co-location of land uses as this can also encourage physical activity if it allows users to make only one linked trip to an area for multiple reasons. Linked trips reduce the need to travel and allow more time for people to linger and be socially interactive, whilst also creating variety and vitality in local centres. Co-location of community facilities is one of Sport England’s Active Design principles.

Support is also offered for signposting to Sport England’s Active Design principles on page 61. However, it is requested that Active Design is listed in the list of ‘Additional Resources’ on page 89 as well for consistency.

Landscape Framework

The list of matters to consider in relation to the Landscape Framework does not explicitly include the creation of a network of multi-functional open space. As well as other benefits, co-locating a mix of sport and recreation activities together provides the opportunity for a number of activity choices to be made at the same location thereby increasing the opportunities for physical activity to take place and also encouraging walking/cycling to the open space. It is therefore requested, that the list of matters to consider includes creating a network of multi-functional open space which is one of Sport England’s Active Design principles.

Part 2 – Design Principles

Principle of Comply or Justify

The principle of the ‘comply or justify’ approach is welcomed as this offers potential to ensure that developers fully consider the design principles in the guide when preparing planning applications and clarifies the weight that the Council will give to the principles when determining applications.

However, concern is raised about how the Council will consistently and efficiently assess whether a development proposal has complied with the principles in the guide in practice in the absence of the SPD setting out a systematic approach to how it will expect developers to demonstrate that they have complied with the principles. If the Council has to go through and subjectively assess a scheme to consider how it has complied with all of the design principles in the guidance this will be a resource intensive process and will introduce the potential for the Council to misinterpret a developer’s approach to complying with a principle. Unless the Council can consistently and efficiently assess whether a proposal has complied with all of the principles, it is likely to also prove difficult to make a robust case to require a developer to justify why they have not met the principles.

To address these concerns, it is requested that the SPD introduces a more systematic approach to support the Council

to assess compliance against the principles. For example, developers could be required as part of a Design and Access Statement for instance to complete a pre-populated checklist (provided by the Council) which would require the developer to explain how the proposal has complied with each of the design principles in the SPD and where they have not, to justify why the principle is not applicable or why they have taken an alternative approach. The introduction of such a process would help ensure that a developer fully considers and addresses each of the design principles before submitting a planning application. It would also allow the Council to efficiently consider how the developer has considered the principles and would reduce potential misinterpretations. The completion of such a checklist could be an application validation requirement. The same comments would apply to the Part 3 – Employment Uses Guidance.

A Compact Place

Support is offered for the principles in sections 2.1 and 2.2 such as walkable distances to amenities, compact neighbourhoods and co-location of different uses as they would be consistent with Sport England's Active Design principles covering 'Walkable Communities' and 'Co-location of Community Facilities'. The application of these principles would increase opportunities for physical activity.

In view of the alignment between the principles in these sections and Active Design which provides detailed guidance and case studies, it is requested that Active Design is signposted to in the list of 'Additional Guidance'.

A Place for All

Support is offered for the principles in sections 3.3 and 3.4 such as safe and comfortable places to stop and clear wayfinding as they would be consistent with Sport England's Active Design principles covering 'Activity for All' and 'High Quality Streets and Spaces'. The application of these principles would increase opportunities for physical activity.

It is requested that consideration be given to including some additional principles relating to accounting for the specific needs of vulnerable pedestrians where shared surfaces occur (e.g. conflicts between cyclists and vulnerable pedestrians on shared footpaths/cyclepaths) and providing supporting facilities such as generous levels seating along key routes and public spaces.

In view of the alignment between the principles in these sections and Active Design which provides detailed guidance and case studies, it is requested that Active Design is signposted to in the list of 'Additional Guidance'.

A Connected Place

Support is offered for the principles in sections 4.1, 4.2 and 4.5 such as clear, frequent and direct links between existing and new places and a connected network of green and blue infrastructure as these would be consistent with Sport England's Active Design principles covering 'Connected Walking and Cycling Routes', 'Co-location of Community Facilities' and 'Network of Multi-Functional Open Space'. The application of these principles would increase opportunities for physical activity.

It is requested that the principle in 4.1.1 clarifies that the links between new and existing places should apply to the countryside beyond a development as well as existing urban areas as it is often interpreted that the links should be focused around the existing urban area rather than considering access to the countryside for leisure which offers physical activity opportunities.

It is also requested that an additional principle is added to section 4.2 to demonstrate that the dual use of community facilities has been considered where applicable e.g. sports facilities on new school sites can also be used as community sports facilities. As well as efficiently providing facilities for meeting the needs of new development, dual use can encourage social connection between different groups within the community e.g. promotion of school-sports club links.

In view of the alignment between the principles in these sections and Active Design which provides detailed guidance and case studies, it is requested that Active Design is signposted to in the list of 'Additional Guidance'.

Great Streets and Public Spaces

Support is offered for the principles in section 5.3 as creating opportunities for interaction would be consistent with Sport England's Active Design principles covering 'Activity for All' and 'High Quality Streets and Spaces'. The application of these principles would increase opportunities for physical activity.

It is also requested that an additional principle is added to section 5.3 to demonstrate that any new civic spaces are designed for community events and pop-up activities. As well as offering benefits in terms of providing a focal point for community events if they are appropriately designed, civic spaces can be a focus for physical activity and encourage people to walk/cycle to them as a destination.

In view of the alignment between the principles in this section and Active Design which provides detailed guidance and case studies, it is requested that Active Design is signposted to in the list of 'Additional Guidance'.

Active and Healthy

Support is offered for the whole of section 7, especially principles 7.1-7.4 as these sections recognise the contribution that design can play in creating active and healthy communities and would be consistent with many of Sport England's Active Design principles. The specific reference to adherence to the Active Design principles in 7.4.1 is particularly welcomed.

It is requested that an additional principle is added to section 7.1 relating to integrating the walking and cycling network into the network of green infrastructure in order to encourage walking/cycling to open spaces and to use open spaces for active travel to onward destinations.

To support the implementation of the principles in section 7.3, Hertfordshire County Council's Health and Well-being Planning guidance

<https://www.hertfordshire.gov.uk/services/health-and-well-being/active-and-healthy-planning-guidance>

should be signposted to in the 'Additional Guidance' section. This guidance which is currently being updated provides specific advice on how developments can be designed to improve health and well-being. Sport England is working with the County Council on the current review of the guidance to align it with our Active Design guidance.

To support the implementation of adherence to Sport England's Active Design principles in 7.4.1, it is requested that this section advises developers to complete the checklist in the Active Design guidance and submit it as part of a planning application to demonstrate how Active Design has been considered and addressed in the development.

It is requested that the wording of the Design Aim for section 7.4 is reviewed as the current wording is repetitive and does not make sense. The following suggested wording would be more appropriate:

To offer easy access to sporting facilities, as well as gyms and free informal sport provision, ~~to sporting facilities, gyms and spaces which can support free informal sport~~, in order to make participation in sports convenient and appealing.

In relation to section 7.4.1, adherence to open space standard and Fields in Trust standards for sports pitches is not appropriate in Dacorum Borough. Sport England does not support the use of standards for sports facilities and the approach to quantifying outdoor sports provision in new development is set out in the Council's recent Playing Pitch Strategy which forms part of the emerging Local Plan's evidence base. The approach in the Playing Pitch Strategy is not based on local standards or FIT standards. It is therefore requested that reference to these standards is replaced with adherence to advice in the authority's Playing Pitch Strategy.

It is requested that the principle in 7.4.3 is extended to include specific reference to the design of indoor and outdoor sports facilities according with the relevant Sport England and sports national governing body design guidance as this would help ensure that the designs are fit for purpose and of a suitable quality that will meet the needs of the community. Reference is also requested to be made to Sport England's design

In view of the alignment between the principles in this section and Active Design which provides detailed guidance and case studies, it is requested that Active Design is signposted to in the list of 'Additional Guidance'. Reference should also be made to Sport England's sports facility design guidance <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance> in view of the comments made on 7.4.3.

For the Long Term

Support is offered for the principles in sections 10.2, 10.3 and 10.4 as creating a strategy and a management plan for community assets, early activation projects and engagement with the existing community would be consistent with Sport England's Active Design principles covering 'Management, Maintenance, Monitoring and Evaluation and 'Activity Promotion and Local Champions'. The application of these principles would increase opportunities for physical activity.

	<p>It is <u>requested</u> that an additional principle is added to section 10.4 relating to establishing programmes of monitoring and evaluation to help to measure the success of an initiative, new facility or development in terms of the benefits longer term e.g. monitoring and evaluating whether the design interventions intended to improve health and well-being have been effective in practice.</p> <p>In view of the alignment between the principles in this section and Active Design which provides detailed guidance and case studies, it is <u>requested</u> that Active Design is signposted to in the list of 'Additional Guidance'.</p> <p><u>Part 3 – Employment Uses Principles</u></p> <p><i>Employment Design Principles: A Healthy Place to Work and Socialise</i></p> <p><u>Support</u> is offered for the principles in section E.02 as a network of connections to pedestrian/cycle routes and key destinations and creating opportunities for informal exercise/physical activity would be consistent with Sport England's Active Design principles covering 'Active Buildings' and 'Connected Walking and Cycle Routes'. The application of these principles would increase opportunities for physical activity.</p> <p>It is <u>requested</u> that an additional principle is added to section E.02 relating to providing suitable support facilities at workplaces to encourage cycling such as showers, changing rooms and lockers. This would complement principle E.10.3 on cycle parking.</p> <p>In view of the alignment between the principles in this section and Active Design which provides detailed guidance and case studies, it is <u>requested</u> that Active Design is signposted to in the list of 'Additional Guidance'.</p>
Include files	
ID	DSDG19
Person ID	1249784
Full Name	Mr Simon Heath
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	Its hard to say - the documents are too long and overly complicated - a simple summary with key points would support the plain english approach to help many understand more easily
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the	No

<p>10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>Looking at the categories, it doesnt appear that recent developments have followed a number of these principles</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
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<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Where in the strategic guide and plan are key services covered? Building continues at a significant rate and there are no doctors, dentists, school needs and road/path improvements covered sufficiently in the plan - and again recent developments in Berkhamsted have occurred without any increase in local services</p>
<p>Include files</p>	
<p>ID</p>	<p>DSDG20</p>
<p>Person ID</p>	<p>1224840</p>
<p>Full Name</p>	<p>Deputy Town Clerk</p>
<p>Organisation Details</p>	<p>Deputy Town Clerk Berkhamsted Town Council</p>
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	
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<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>The documents give a good description of much of the inheritance of the area (natural habitat, ecology, topography and buildings heritage, etc.). Much of the environmental landscape and constraints are bequeathed by nature, but the urban and industrial environment has been created by man in recent history - and can therefore be erased, maintained or enhanced. This document should allow for the possibility that much of the latter, urban and industrial constraints, could and should be removed or altered: just because something is old does not mean it is good, although heritage buildings should not be torn down without sufficient justification.</p> <p>There is insufficient attention given to the linkages with adjacent counties and what that implies: for example, Dacorum, being largely a commuter community at the western extremity of Herts</p>

	<p>has more affinity and connection to Bucks and London than to (say) Hertfordshire.</p> <p>It would be appropriate for greater consideration to the natural constraints to be given. The chalklands in Dacorum already have a worrying low-water table, which is an issue of national importance and should be at the forefront of considerations and not merely just a mention in a weighty document.</p> <p>The Town Council's opinion is that the document does not recognise the reality that much development today is bolted onto existing townships, ultimately leading to urban sprawl. Developers should consider the impact of the totality of the pre-existing town, plus the new development with the necessary infrastructure to make a coherent whole.</p>
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<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>The document is too long, and could be onerous for people to engage with. Furthermore, it lacks specific standards and clarity on new developments. It also has some material failings, which are outlined below:</p> <ul style="list-style-type: none"> • The documents read like a set of guidance for very large new developments/new towns. However, in practice, the reality is likely to be a situation whereby lots of mid-scale (a few hundred house) developments are bolted onto existing communities. These developments individually will of themselves not be of sufficient scale to accommodate all of the grand designs set out in the document, nor will they warrant investments in existing community amenities. The consideration of future developments and with their impacts on the pre-existing societies considerations of community, amenity, connectivity, mixed purpose etc., is crucial. These guidelines should be used to create an overall plan within which sub-developments are tendered. • The document is heavily weighted towards the traditional considerations of living design, building layout, good homes, distinctiveness, compactness, street scenes, etc., before getting onto environmental, health and carbon issues. This very much reads like business as usual (with more imagination admittedly), with nature being considered as an afterthought. What this means is maximise homes, make them look really pretty, be congruent with heritage and within that context do what you can to minimise the detrimental impact this has on the environment, climate and health. This line of reasoning needs to be exactly reversed. Design homes and communities that maximise conservation, that maximise green spaces and communities, that maximise the opportunities for safe and healthy mobility and then within that context be as consistent with the pre-existing heritage and pre-existing notions of what is pretty as possible. The scope of the document means that it is all things to all people; tendering developers can never comply with all of these ideals and so what they really need to know, in addition to this, is what the big priorities are (as detailed in sections 4, 7 and 8). • Section 7.6 on Air Pollution is particularly sparse and makes only vague references to reducing car dependency and including green screening. The adverse effects of air pollution are well documented. We know that around

50,000 premature deaths occur every year due to air pollution and that Covid-19 has had a particular impact in areas of poor air quality. Developers should be required to evidence the base line pollution levels and demonstrate precise proposals for how they will manage air flow and minimise pollution. Similarly, on Climate Change (e.g. Section 8.6), carbon neutrality is treated as an optional extra: "deliver carbon neutrality where possible". Given that these guidance documents are presented on a "comply or justify" basis then carbon neutrality (or better) should be the normal expectation. Being resilient to climate change and extreme weather (section 8.8) is equally vague. It is beyond any doubt that further extreme weather and temperature increases will occur (even if the entire world went carbon neutral today) and so hand-wavy phrases such as: "Trees and soft landscapes should be climate resilient" are inadequate. There are so many attested benefits to the inclusion of trees and vegetation within living spaces beyond climate change (including managing flooding, air quality, mental health and attractiveness) that the expectation should be: "Extensive use of trees and soft landscapes should be incorporated so as to ...". Proposals should demonstrate the impact that the landscaping designs will have to control all of these risks, not just climate.

- Several references are made to walking and cycling routes. (Sections 2.1, Section 4, Section 5.10), however the current style of provision is not remotely acceptable in a world where people seek to increase the usage and pleasure derived from these activities. Currently, taking Berkhamsted as a typical example, as the town has grown the historic footpaths have been maintained in such a way that they are narrow dark corridors bounded on each side by 6 feet high fences and/or encroaching hedges. They are unpleasant, forbidding and scary. Too narrow for two people to walk and talk. Unsurprisingly people are disinclined to use them. To date there are no dedicated cycle routes in Berkhamsted.
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- It is vital to think of developing communities of people who feel proud to live there. And people who will come together to socialise and care for each other (as we have seen in the recent Covid-19 situation).
- There is no mention of community-based utilities provision such as community energy schemes or waste management facilities. How about encouraging local food waste reprocessing into energy? Local heating/cooling distribution networks, for example (section 8.7). More emphasis should be given throughout the document on incorporating local vegetation (green corridors, trees, hedgerows, ponds etc., within the design). As a society and as planners it should be considered that integrating the human world more into the natural world may take up more space overall versus maximising density in concrete jungles. The Town Council

	are delighted to see references to reducing dependency on cars, although aspiration needs to be backed up with specific commitments in terms of (for example) targets for cars per household ratios.
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Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	<p>The Town Council very much welcome the intention to create industrial/business locations integral to the living spaces. It is also pleased with the guidance on attractive designs which include green spaces, focal points and areas for recreation and socialisation, although these need to be given greater prominence in the guidance.</p> <p>Developers should move away from the notion that business parks are ugly, out of the way minimalist places hidden from view, or places where people spend the minimum amount of time and just go there to earn their living and get out as fast as possible. People can spend more than half of their waking hours at work and therefore these work spaces should be designed to be pleasant and joyful places to be.</p> <p>As per the residential design however, it is important to make the priorities much clearer and enhancing the natural inheritance/environment, zero carbon and avoidance of noise, air and water pollution should come first and the external designs fit into that paradigm rather than the reverse.</p>
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Include files	
ID	DSDG21
Person ID	1145998
Full Name	Mrs Pauline Hughes
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?	Yes

* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
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If yes, please provide you comments along with any supporting information you may have.	<p>The basics, based on past experience with developers:</p> <p>No new Tower Blocks that overshadow nice green areas, protect the nice parts.</p> <p>Stricter reviews of Transport Implications provided by developers as they are biased and done by people who do not know or care about HH and its road issues.</p> <p>Most important : Build houses for families. Children do not do well in flats except as last resort.</p> <p>No future slums and confined teenagers.</p>
Include files	
ID	DSDG22
Person ID	1249858
Full Name	Mrs Jillian Luff
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
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If yes, please provide you comments along with any supporting information you may have.	Comprehensive consideration of multiple aspects necessary for good planning. I hope these will be followed if the plan is passed. I notice reference to Additional Resources on page 24 – 'Making Space for Cycling'. For multiple reasons it is imperative that time and effort at the planning stage and subsequently funding is provided for this crucial aspect of the planning process.
Include files	
ID	DSDG23
Person ID	1224840
Full Name	Deputy Town Clerk
Organisation Details	Deputy Town Clerk Berkhamsted Town Council
Person ID	
Full Name	
Position	
Company / Organisation	
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<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Section 1 – A Distinctive Place</p> <ol style="list-style-type: none"> 1 As well as the ‘pre-existing context of a site’, the principles should also consider the pre-existing topography and landscape of a site and encourage use of natural features in the environment and landscape to determine the shape of development <p>Section 2 – A Compact Place</p> <ol style="list-style-type: none"> 1 When considering co-location of industry and residential, need to take into account and mitigate the issue of poor air quality caused by industrial activity 2 Ref: 2.4 – when advocating density/scale – should define a different approach when on ridgetop and/or sensitive/unique settings. <p>Section 3 – A Place for All</p> <ol style="list-style-type: none"> 1 Ref: 3.1 - Aspiration for intergenerational living is good but how do ‘retirement’ villages/developments fit into this? <p>Section 4 – A Connected Place</p>

- 1 Ref: 4.3 – whilst setting out the aspiration for visual connection, the guidelines should be mindful of the desire and need to preserve settlement identity and separation eg Bourne End from Berkhamsted.
- 2 Ref: 4.5 – re: ‘natural connection’ see my comments above re: Section 1. This would help to ‘bring nature in’.
- 3 Ref: 4.7 – the paper needs to set out a solution for connectivity in hilly areas.

Section 5- Great Streets and Public Spaces

- 1 Ref: 5.7 – increase in street trees is welcome for the reasons outlined, but is at odds with current DBC (unofficial) moratorium on street trees.
- 2 Ref: 5.8 – to enhance the microclimate approach in front gardens, should consider prohibition of paving over gardens.
- 3 Ref: 5.11 – include neighbourhood parking areas rather than individual parking spaces?

Section 6 – Great Homes

- 1 Ref: 6.5 – no mention of storage for bikes? Essential.

Section 8 – Facing the Climate Crisis

- 1 Generally – This section should reflect my comments above about use of natural features to improve biodiversity in urban developed areas and natural drainage by not paving over garden spaces.
- 2 Other general points:
 - 1 No mention here of the earth itself as a carbon store
 - 2 No mention of preservation and introduction of wetlands as essential habitat
 - 3 The need to recognise wildlife corridors and connections and protect them should be written in to this section.
- 3 Ref: 8.7 – section on energy is light on ambition
- 4 Ref: 8.8 – there appears to be no mention of the approach to building on flood plains – in a section on resilience to climate change and adverse weather....

- 1 What is the industrial/economic strategy for Dacorum? This should form part of the context from which some of these policy decisions are developed.
- 2 I'd like to see built environment landscaping be less manicured and more responsive to local character and topography and the natural state of the land.
- 3 Live/work spaces should be encouraged – I couldn't spot a reference to this anywhere...?
- 4 Shared office spaces and co-working spaces should be prioritised in light of Covid and long term change in home working. To promote working in the local community and keeping spending in local economy.
- 5 Enforcement of the guidelines does not seem to be discussed – how will this be monitored and actioned?
- 6 What is the delivery plan – again, no reference to how the guidelines will be rolled out and translated into policy.
- 7 Would like to see the required infrastructure in place before building commences where possible...for many reasons, but a key one would be that future residents know they are buying in to a particular approach eg not having a car/using public transport.

This document has a wide scope and the design principles include many details which the Town Council support, for example the provision of safe and useable cycling routes.

If only the developments over the last thirty years were informed by the broad sentiments expressed in these documents, then

	<p>we would have begun with a much more community based, attractive, green urban inheritance.</p> <p>This document is very welcome, there are many good aspects to it but in order to deliver on the priorities of the future it needs to be clearer on what matters most.</p> <p>Thank you for the opportunity to comment.</p>
Include files	
ID	DSDG24
Person ID	1202626
Full Name	Brian Worrell
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>Page 6. Is this a legal/statutory document? Looks like guidance rather than it being mandatory which means developers can get round having to provide compliance.</p> <p>Page 21. No mention of Rights of Way which are generally historical. Observation will indicate where the network has previously been and where they have been severed by past development, and where anomalies have been created. This will indicate where opportunities to resolve an improve the Rights of Way Network exist and where connectivity with new routes can substantially improve the wider network for all vulnerable users from walkers to cyclists to horse riders to horse driven carriages and mobility users. I always fail to understand why such an important and historic network is rarely if ever mentioned and integrated into developments.</p> <p>Page 26. It is worth remembering that Active Travel and the Walking and Cycling Strategy both are intended to include equestrians and has been stated in Parliament. I refer to examples such as:</p> <ul style="list-style-type: none"> - The Transport Minister Michael Ellis on 20th June 2019 - In November, the Government published its response to the Cycling and Walking Investment Strategy (CWIS): safety review call for evidence. The response sets out a vision and a two year plan containing 50 actions to tackle cycling, walking and horse riding safety. - Minister Jess Norman - House of Commons debate, 5th November 2018 c1317, 'The more people (walkers, cyclists, horse riders, etc.) who use Active Travel, the fitter and healthier they will be , and the more their communities will benefit from lower congestion and better air quality, amongst a host of other benefits. We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse riders'. - Chris Grayling MP Secretary of State for Transport, 16th July 2019. Department guidance makes it clear local authorities should consult with local groups such as equestrians when developing cycling and walking infrastructure plans. - Minister of State (Department of Transport) Michael Ellis 23rd July 2019. Her Majesty's Government – this Government – are investing vast sums in cycling, pedestrian access, equestrianism and all forms of active travel.....

- Unknown reference (in the debate on Active Travel). I would urge all local authorities to allow horse riders to use cycle trails, routes and any other ways where it is their power to do so, and to encourage permission or dedication to happen where it is not in their power. Unless there are good and specific reasons not to expressly allow horse riders to use such routes, local authorities should take steps to accommodate them. Local authorities should be making the most of their off-road networks through integration of use. Multi user routes have been shown to be readily adopted and well appreciated by local people. Where they are done well they bolster community cohesion and create a better understanding between users.

Horse riders are particularly vulnerable road users, and cycle routes can provide appropriate and important opportunities to avoid busy roads.

Page 27. Under Site Context - Examples of what to observe, a bullet point for 'What is missing' should be added. This would provide the opportunity to add opportunities such as improved rights of way.

Also to assist, a note should be included somewhere that early consultation of the Rights of Way Improvement Plan, a statutory document, and the Definitive Modification Map Order (DMMO) Register is essential and beneficial.

Perhaps non-motorise vulnerable users (NMU) should be added to the Understand box and provide the opportunity for future needs to be stated.

Page 29. Examples of What to Observe could include best practice for new community design. Cambridgeshire have attempted to soften the boundaries between urban and rural with creating strong off-road connections between them as well across the development, in particular bridleways -

see https://www.cambs.gov.uk/media/14166/boundaries-adopted-2-10-2019_part2.pdf as one example.

Page 30. Green corridors and wildlife corridors are essential which only serve to connect urban developments with the rural landscape and soften the boundaries. They also provide for leisure and education of urban dwellers about the rural landscape.

Page 33. Again rights of way provide much of the connectivity across an area and expansion of the network would realise a significant gain, particularly when incorporated into green corridors.

Page 56. The rights of way network should be added to the middle column as part of the sport and leisure facilities.

Page 58. The focus is on urban requirements and little on the buffer integration zone between urban and rural. I suggest this Vision only encourages the division between urban and rural instead of encouraging a soft transition. After all, the main users across this buffer zone will be urban dwellers seeking refuge in the rural landscape, not the other way round. This as it stands will do little to educate urban dwellers about the needs of the rural landscape upon which they are so dependant.

Page 59. Under Movement, only cycling and walking are listed. Whilst these are very important in today's environment, that shouldn't be at the expense of bridleways and restricted byways for other vulnerable road users. With the significant amount of public being poured into cycling and walking routes, it could be seen as discrimination against other users, as the same money could provide for all vulnerable users with little or no increased expenditure.

Page 62. In the Consider box, bullet numbers 4, 5, 6 and 8 relate directly to the historic Rights of Way Network and should be the start point for any desirable community development.

	Page 64. In this page Consider box, bullet 7, ask how the rights of way can be integrated. Active Travel is more than a strategy for walking and cycling (as we have seen from my response to Page 26) and ALL vulnerable non-motorised user must be catered for.
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	<p>A general comment, there are loads of examples of 'little boxes' that are uniform and probably not in keeping with the neighbourhood and landscape they are placed in.</p> <p>Page 6 is one such example. I cannot agree that Horsted Park is a Distinctive Place, other than it is photograph of a series of little boxes. This is last thing we need or want from a new community. The Derwenthorpe example of Page 13 is far better in that it shows a mix of design and finishes which must be what we need for a 'garden community'.</p> <p>Page 18. The use of high quality materials is mandatory, both inside and out. Paper thin internal walls have to be feature of the past and are not acceptable. Also the external materials and design must reflect the landscape they are in. Preferably local materials are preferred, although I recognise that these are in short supply in Dacorum. Only Bovington Bricks come to mind and we don't all the buildings in the same finish. What is so pleasing about villages and old towns is the mixed use of so many materials and this should be emulated as far as possible.</p> <p>Page 24. A comment on 'Enhance Access to Sport'. It is no good just placing a 'sports pitch' or two in a development to get the tick in the box. It is essential that the local sport and leisure organisation(s) are consulted to ensure these facilities can be supported by clubs.</p> <p>Also remember that existing leisure routes, such as the rights of way network, must be incorporated into new routes for non-motorised users - walkers, cyclists, horse riders, horse carriage drivers and mobility users.</p> <p>Page 29. Absolutely a mandatory requirement these days for solar panels (design the roofs to face south), heat pumps, electric vehicle charging points and insulation to a high degree to be designed in every home.</p>
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	As far as I can tell, not being an expert in employment requirements.
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes

<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>It must be made mandatory to prevent the mistakes of the past and ensure high quality homes are built for all residents, not just the well of.</p>
<p>Include files</p>	
<p>ID</p>	<p>DSDG25</p>
<p>Person ID</p>	<p>1249904</p>
<p>Full Name</p>	<p>Mrs Christine Ridley</p>
<p>Organisation Details</p>	
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>This document is wide ranging but rather general and could be applied to any large development.</p> <p>However, If the documents have identified the key characteristics of Dacorum, the present housing plans seem to ignore the amazing views up the Gade valley north of Hemel Hempstead. Under present plans for the Garden Community, houses will cover at least one side of the valley almost as far the Red Lion pub along the Leighton Buzzard Rd.</p> <p>These plans do not respect the natural beauty of this landscape and are contra to the advice in the documents: "Provision for existing high value natural features".</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>There are some excellent ideas in the design principles and if all are taken into consideration high quality development may well be secured.</p> <p>However, I think the plans could be even more ambitious in terms of houses for the future. I would like to be assured that all the proposed buildings will be zero carbon, - there are already some dwellings that are zero carbon in Hemel, so this must be possible. All new dwellings should have solar panels, unless the roof direction is completely unsuitable and also heat pumps, and all should have electric charging points. If the number of vehicles per household could be limited, that would be excellent, as at present the appearance of Hemel is ruined by all the cars and vans cluttering the streets, and parked on the pavement etc.</p> <p>It would be even better if the housing that has already been approved in Hemel Hempstead could be built with the climate emergency in mind. For example, the proposed houses for LA3 are not going to be zero carbon and won't even be fitted with solar panels, yet the climate emergency is already with us.</p>
<p>Include files</p>	

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	There are lots of excellent ideas in these documents. However, they do not specify the types of industry or employment which will be carried out inside the buildings. Will there be enough employment opportunities in Dacorum for all the people who are going to live in the many thousands of dwellings which are planned to be built here? Will the future bus service be reliable enough to get people to work and back from all the different areas in Hemel, no matter what time of day or night they work? The present bus service is neither reliable, frequent enough nor cheap enough to encourage Hemel residents to leave their cars at home and use public transport instead.
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	No
If yes, please provide you comments along with any supporting information you may have.	
Include files	
ID	DSDG26
Person ID	1012318
Full Name	Mrs Jane Hennell
Organisation Details	Area Planner Canal and River Trust
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for

our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Grand Union Canal runs through Dacorum and in some areas acts as the boundary between Dacorum Borough and Three Rivers District and continues on into Buckinghamshire.

Whilst some sections of the canal fall just outside the administrative boundary it is important that developments still acknowledge and consider their relationship to the canal network in these locations and that each council recognise the need for cross boundary working when considering planning policies which relate to the canal.

The canal network is an important part of the historic development of the area and we are pleased to note its reference as a historic highway. The draft document recognises the importance of Green Infrastructure and we are surprised that the canal is not shown on the Green infrastructure map at page 16.

However, it is positive that there is a whole chapter on water and that the canal is recognised as a strong defining feature of the narrative of a place and can create a strong focal point for design. The Canal & River Trust promote all waterways as tools to be used in place making and place shaping and contribute to the creation of sustainable communities. We seek for any development to relate appropriately to the waterway, minimise the ecological impacts and optimise the benefits such a location can generate for all parts of the community.

The waterways are significant Green Infrastructure, but they also function as 'Blue infrastructure' which serves in a variety of roles, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunications.

They also offer opportunities for leisure, recreation and sporting activities as part of the 'natural health service' acting as 'blue gyms' and supporting outdoor activity and physical and mental health and wellbeing. We work extensively with private, public and voluntary partners to conserve, enhance and improve our waterways.

The canal corridor provides access across the Borough, linking new and proposed residential areas to key employment areas, and open space. The towpath provides an attractive, traffic free route through the borough and there are also a number of bridges which cross the canal further improving connectivity across the canal and to the towpath.

We are very pleased to note the context section on water and in particular the detail provided in the What to observe section.

We recommend a number of guiding principles for waterside developments and individual waterways and water spaces need to be viewed as an integral part of a wider network, and not in isolation. The canal corridor should therefore not be considered as a barrier to connectivity and proposed developments should seek to unlock the full potential of the canal corridor in their design and layout.

Water should not be treated as just a setting or backdrop for development but as a space, leisure and commercial resource in its own right. The 'added value' of the water space needs to be fully explored. Waterways themselves should be the starting point for consideration of the development and use of the water and waterside land – look from the water outwards, as well as from the land to the water.

References to the good waterside design could be strengthened by way of promoting the benefits of the canal network and clearly setting out the principles of good canal side design practice to designers, developers, business owners, local residents and other stake holders and this should include a link to the advice provided by the Canal & River Trust on our Website. here. The Trust are currently producing further guidance on 'Great Waterside Places' and details of this will be provided as soon as possible in order that reference to it can be included within this document..

The addition of a specific section within the SPD outlining the principles of quality design beside the canal network is therefore recommended. This should require developments that are adjacent to, or connected to the waterway network to demonstrate accordance with the following design principles;

- *Promote the waterspace as treasured public amenity and place of wellbeing through an open and engaged design approach, providing a frontage to the waterside where appropriate.*
-
- *Protect and enhance the heritage, natural environment and landscape character of the waterways providing a native and naturalistic buffer where appropriate.*
-
- *Encourage public access, sustainable vehicular-free commuting and recreational use of the waterways*
-
- *Safeguard the safety and structural integrity of waterway infrastructure and the safety of users*
-
- *Protect and safeguard inland waterways for water resourcing purposes, including the need for water management, improving water quality, managing land drainage, and avoiding, reducing and managing flood risk.*

Movement framework

We suggest that it is acknowledged that if additional use will occur on an existing network adjacent to or leading to the site then the quality of that network, and its ability to cope with additional usage should be considered, as part of a movement audit and improvements made if necessary.

Urban design Framework

The layout and design of streets is integral for the success of the urban environment. It should however also be ensured that developments have regard to the existing infrastructure in the surrounding area. Developments should be required to include well designed connections to existing networks, such as the towpath, to promote connectivity and sustainable travel.

Developments need to consider the visual impacts of parking areas and parking on access roads on the canal's outward perspective. Proposals must aim to avoid creating direct views of the developments 'back of house' from the canals outward perspective which heavily degrades the canals credentials as a green corridor, tranquil retreat and its use as and treasured public amenity.

Back of house elements might include car parks, service areas, such as bin stores, delivery areas, sub stations etc. Vehicles can be visually buffered from the canal through clever design and use of landscaping. This might include well placed linear hedgerows to visually buffer parked vehicles and with parking bays set between plots or within buildings, again to hide from view. Staggered bays with surrounding planting can also work to soften visual impact.

Lighting –consideration must be given to the impacts of lighting on the natural environment. The Trust advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the development site and it should not provide flood lighting to the canal corridor to show consideration for bats.

Section 5

The area adjacent to the canal, whether that be the towpath benefits from being publicly accessible. The towpath should be incorporated into the public space in more urban areas, although this may be less appropriate in rural locations. Development should overlook the towpath or canal to give a perception of public safety.

Developments should be required to include signage to highlight connections to the canal the case of development adjacent or connected to the canal corridor this should include appropriate wayfinding to/on or from the towpath as well as to destinations along it. All wayfinding on or adjacent to the towpath should be agreed first with the Canal & River Trust.

The Trust do not promote the provision of car parking or access roads adjacent to the canal unless suitable screening is provided.

Section 6

Boundary Treatments

Boundary treatments are a key design aspect in any canal side development and engagement with the canal should be encouraged. Whilst robust barriers are required to prevent vehicles accessing the waterway the provision of fences, walls and railings to the canal boundary can have a negative visual impact on the canal corridor. Developments should therefore be required to carefully consider the choice of boundary treatment along both sides of the canal corridor.

Landscaping

As identified previously there are particular considerations that development proposed adjacent to the canal network should take into account and landscaping is a key consideration. It needs to be ensured that any planting proposed includes native species and is appropriate for the waterside setting.

Any planting needs to be set back sufficiently from the canal corridor to allow for future growth and ensure it does not adversely impact on the stability of the canal infrastructure or affect safe navigation of the waterway. The long-term maintenance / management regimes for landscaped areas can also impact on their overall design success and development should be required to consider this and include details with any Applications.

Section 7

The Trust promote the canal towpath for health and well-being and its use has increased dramatically in some areas during the Corona virus lockdown. This section does not mention the need to link walking and cycling routes into existing provision or ensure

	<p>that existing provision is fit to cope with potential increased usage. An audit of provision, and the impact of development on should be carried out, with mitigation put in place beyond the site boundary as necessary, in the same way that highway improvements might be required to facilitate additional vehicle movement as a result of a development.</p> <p>Section 9</p> <p>There is the potential for the canal to accept surface water discharges from sites and this should be referenced. It should however be noted that the drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways and the Trust is not a land drainage authority and therefore any proposed discharges are not granted as-of right and where they are granted they will usually be subject to completion of a commercial agreement.</p> <p>The Trust also wish to highlight the potential of the canal for heating & cooling for district heating network or individual schemes and reference to this potential for the canal to contribute to low carbon technologies should be included.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>Employment Design Guide</p> <p>It is acknowledged that many of the principles in the preceding parts of the guide are relevant to the design and layout of employment buildings.</p> <p>It is very important that large shed type developments are not built close to the back edge of the canal or towpath and present a bland unrelenting aspect to the canal as the I will have a negative impact on the character of the waterway and contributes to the fear of crime if the towpath is not overlooked.. This is particularly important where there is already similar development directly opposite. Security fencing can also present an unattractive façade and should de set back with landscaping (native species hedgerows) planted through. Access to both side of this landscaping should be possible within the application site to ensure that it does not become a maintenance liability for the Trust or impede navigation.</p> <p>Employment uses should provide an access onto the towpath if possible, to allow a sustainable travel method to work. A new access will require the agreement of the Canal & River Trust. Security lighting should not light the towpath or waterspace.</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Self-build and custom build housing is high risk development strategy for the setting of the canal corridor. There is high potential to negatively impact upon the canal as it creates an inconsistent visual character between plots, mixed quality design, construction and differing boundary treatments.</p>

	<p>Design codes can address this to some extent though further assessment of the impact of self-build and custom housebuilding on 'sensitive locations' such as adjacent to the waterway corridor should be undertaken.</p> <p>Any Design codes would need to include an assessment of the visual impacts from the canal corridor and clearly set out details of design principles to be applied across the whole of any sites being put forward (not just any self-build/custom build areas) boundary treatments, materials etc would also need to be detailed to ensure a consistent approach and limit any adverse visual impact.</p> <p>The Canal & River Trust are happy to engage further with the LPA on the development of a specific design section relating to the canal network or the inclusion of a link to our own guidance.</p> <p>Our current advice is provided on the Canal & River Trust on our Website. here. The Trust are currently producing further guidance on 'Great Waterside Places' and details of this will be provided as soon as possible in order that reference to it can be included within this document.</p> <p>We welcome early involvement at masterplan stage with both Council and prospective developers. Please do not hesitate to contact me with any queries you may have.</p>
Include files	
ID	DSDG27
Person ID	1143779
Full Name	Ms Julia Marshall
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	Yes
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
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* Yes	
* No	

<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No</p>	No
<p>If yes, please provide you comments along with any supporting information you may have.</p>	
<p>Include files</p>	
<p>ID</p>	DSDG28
<p>Person ID</p>	1249989
<p>Full Name</p>	Mr Neil Burton
<p>Organisation Details</p>	
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>This is a complex one as the documents cover a lot of options. Hemel/Dacorum is a mix of beautiful old housing and awful council housing so you could argue that anything could be in keeping. I believe to move forwards and to raise the standard of housing, buildings should have architectural merit and space. The trend is to pack as many houses in and for the developer to maximise profit. There needs to be a balance of power where the look and feel of the area is respected first. The design guide needs to make it very clear that you need to look at neighbouring housing (not streets away) to decide on design specifics. The new builds should be an improvement to the area and provide space as well as housing.</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>I believe that developers will pick and choose the cheapest design and the one that will allow the most houses to be built on a plot of land. I am not against developments of new estates at all, I just see that developers tend to build the same design and then "add a bit of flint" to satisfy the criteria. There needs to be a strong case for proper well thought out areas and this is especially true when building apartments. We can see from the apartments around Hemel that little effort has gone in to design.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes</p>	Yes

* No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	As stated above, the design brief should be much more succinct and favour the community rather than the developer. I would like to see fewer flat options also, Hemel is being overrun with flats/apartments. As an example of design rules, I have a developer next to me that does not have enough rear garden to suit a development (has 5m instead of 11.5m) so his "workaround" is to stick some space on top of carports and call that a garden. If this type of thing is allowed (hopefully will not be) then the whole design process is too flexible in favour of developers.
Include files	
ID	DSDG29
Person ID	1207259
Full Name	Mr Graham Bright
Organisation Details	Chairman Grove Fields Resident Association
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	We have a lack of confidence that design principles will be followed by landowners and developers. In addition we have a lack of confidence that when this happens the planning authority (Dacorum) will effectively enforce the design principles to ensure the developers take remedial action. Case in point is that the landowner near us has installed 2.5 metre metal fencing after Dacorum and the Planning Inspectorate refused them permission, enforcement have visited and are aware but nothing has changed.
Include files	

<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>There is strong emphasis on improving health and well-being, on promoting walking and cycling, on establishing a sense of place and on promoting biodiversity. All these factors mean we should not be developing the green belt fields on Grove Road but instead using them as a Community Park and utilising our natural assets.</p> <p>The local plant species" (Part 3 E04 Biodiversity) are there in the Grove Fields and should be allowed to thrive</p> <p>Reference Possible new development</p> <p>Overall I got the impression that the way forward for new developments is to create self-sufficient developments like mini settlements. There was a lot of emphasis on building a sense of community, on dwellings that served different purposes, on frontages which were accessible and gave an overview of communal green areas and neighbours, of additional shops and employment. There was a comment that we should not be building "dormitory towns". Two issues struck me.</p> <p>1. The "public" buildings that used to exist at the New Mill end of Grove Road have all closed: the Pheasant pub, the hairdressers, Ayres store and the New Mill Social Centre opposite it. So, would new enterprises, if included in a development on Grove Fields, thrive?</p> <p>2. Tring is very cohesive as a community and well- liked by its residents. If a new development became a sort of satellite village, is that what the town wants? Surely we want a new development to be absorbed into the whole town.</p> <p>Your phrase "sympathetic to local residents" is an important one. Any development needs to be sympathetic to all local residents, not just those of us bordering Grove Fields. The main sticking points are vehicular exits/entrances onto Grove Road and Bulbourne Road and the destruction of a "biodiversity corridor " i.e. the surrounding hedges.</p>
<p>Include files</p>	
<p>ID</p>	DSDG30
<p>Person ID</p>	1250013
<p>Full Name</p>	Mrs Nikki Bugden
<p>Organisation Details</p>	Clerk Nash Mills Parish Council
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p>	Yes

* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	No
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	<ul style="list-style-type: none"> • Possibly, please see comments below.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	No
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	<ul style="list-style-type: none"> • Possibly, please see comments below.
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?	Yes
* Yes	
* No	
If yes, please provide you comments along with any supporting information you may have.	<p>NMPC welcomes and supports the proposed document and would like to offer some supplementary comments Part 1 – Design Guide</p> <p>Page 28 – Edges</p> <ul style="list-style-type: none"> • Landscape Edges offer the opportunity to enhance access to the districts’ high-quality open spaces and green infrastructure for new and existing residents in the area. They can also provide biodiversity corridors or visual landscape buffers. • Transport Infrastructure edges are vital for the development of sustainable places but can also bring noise and air pollution. <p>The first bullet seems to be the answer to the second one (noise and air pollution). It would be interesting to know if there is a standard ‘edge’ that would be put in place between housing and major roads (e.g. potential developments next to the M1 - Hemel Garden Communities project). Is there already a minimum amount of space /number of trees that must exist? For the purposes of health and wellbeing, should this be increased for future developments as a natural filter for co2 emissions?</p> <p>Page 64 – Movement Framework</p> <p>It is encouraging to see mentioned on this page “flexibility to accommodate future expansion beyond the site and changes in lifestyle and movement patterns” and “flexibility to accommodate electric and automated vehicles and future technology”. It should be recognised, however, that future changes in the use of</p>

vehicles (particularly autonomous) should not be a reason to overly-minimise immediate parking requirements.

Supporting strategies (bottom of page 64) – it mentions a few which should be developed but does not mention a Parking strategy which would also be relevant here. There was a new draft strategy last year. Is this now adopted?

Part 2 – Design Principles

2.1 Create Walkable Neighbourhoods with Identifiable Centres

Having walkable facilities (e.g. commercial / social spaced) is very well intentioned. How can we make sure that these facilities are not removed during various iterations of development plans before building?

3.1 Provide Housing and Facilities for Different Ages

NMPC wholeheartedly supports the proposed integration of care homes and nurseries/intergenerational living.

4 Create Safe, Overlooked Spaces

NMPC supports the concept of passive surveillance to keep spaces safe.

5.10 Reduce Car Dominance/5.11 Integrate Car Parking

Whilst it is admirable to aim for a reduction on car dominance, recent developments in the Nash Mills area are evidence that this assumption often fails in a practical sense. Even though we are in a 'commuter belt' the majority of our resident's use cars at weekends and evenings. This is in part, but not entirely, due to the poor provision of train services and a lack of alternative local transport, which has a severe impact on traffic in our parish. Our proximity to the motorway network (M1/M25) also results in car ownership to facilitate use of this infrastructure. A huge issue with our most recent developments has been a severe lack in parking provision which has resulted in pushing the problem onto neighbouring streets. Undercroft parking is a good option providing the security of users and their vehicles is adequately addressed.

5.10 Reduce Car Dominance

The design aim to prioritise PEOPLE first and private vehicle users last seems incongruous as the vehicle users are still people, hence should receive equal consideration. Past local developments prove that lack of parking provision is not prioritising the wellbeing of people.

5.11 Integrate Car Parking

"ensure that public realm isn't dominated by cars parked on footway" will only be possible if sufficient parking is included. Where restrictions are put in place in one area, it simply shifts the problem as we've seen in Nash Mills.

6.4 Maximise Space and Daylight

Whilst the document mentions a minimum size for balconies there does not seem to be a minimum internal space requirement noted.

There does not appear to be any specification to ensure that garden space in houses is commensurate with the number of inhabitants and there appears to be no consideration of this.

7.1 Create Attractive Safe and Usable Walking and Cycling Routes

NMPC supports the delivery of safe cycle routes, however there is a wider implication and DBC must ensure that the network across Dacorum is safe and usable and supports this initiative, linking new developments to existing neighbourhoods as well as the town centre and industrial estate.

As part of this process NMPC would welcome consideration and discussion relating to the provision of options for a safe means for cyclists to traverse the busiest routes within Dacorum such as the A414 and the 'link road'. These are vital routes linking from large residential areas to the main business centre at Maylands and therefore provide a hazard to cyclists due to the volume of traffic on these routes. Currently provision for safety here is lacking which may deter those willing to use alternative methods for travelling.

Adequate lighting must be installed to keep users safe, particularly during winter months as currently concerns re personal security hinder many people from walking within the parish at night. In addition, while the focus on walking / cycling is obviously well-intentioned, the natural topography of the area will make this hard for some.

7.3 Give Prominence to Health

This is such a major issue in Dacorum with its current population and therefore we would expect this topic to be prioritised and to include significantly more detail on how DBC will ensure delivery of this proposal and how our overstretched services will be futureproofed for the anticipated population increase.

7.5 Incorporate Food Production

This initiative is brilliant and would provide much needed access to 'green space', a desire for which has been highlighted by the recent Covid-19 crisis.

7.6 Mitigate the Effects of Pollution the focus in this section is about reducing car dependency and the use of green infrastructure for screening. The potential to encourage an increase in electric car use is not mentioned but would also be relevant under this heading (although provision of charging options is mentioned elsewhere in the document).

8.3 Drain Places Naturally

If this is the place to bring this up, please can we comment on the unusual choice of a photograph of a child on a scooter on a very narrow bridge over a drain_ possibly a safety matter?

8.6 Conserve Energy and Reduce Carbon Emissions

NMPC welcomes the initiative of "discrete on-street electric car charging points" to allow those without access to charging in their own home to still own electric cars in the future.

8.7 Create Opportunities for Energy Production

NMPC welcomes the initiative to ensure that renewable energy is used and importantly that this energy is harnessed by adequate battery storage.

9.3 Anticipate changes in mobility

The approach for flexible design seems sensible for the longer-term plan and not to 'lock in' current modes of transport, such as private cars. However, it would be interesting to know more about how this might work to avoid an initial lack of parking for current modes of transport.

Part 3 (Employment Guide)

Due to the current Covid 19 crisis it may be prudent for any document relating to the working environment to consider some of the implications of a pandemic situation. It could be that going forward there is a wider shift to people working from home rather than commuting so it may be a benefit to look at the long term use of these sites - would it be easy and cost effective to convert these buildings into residential buildings (as has already happened throughout Dacorum), with the infrastructure and provision requirements that entails, does this need to be a consideration?

E.08 Smart Mobility

As mentioned above encouraging people to cycle to work will rely heavily on the wider cycle network across Dacorum being safe and accessible, simply adding the network to the new development will not enable the wider network to be sufficiently linked in a safe and secure way.

Wider Comments

These proposals seem to relate to large-scale developments with little consideration of smaller scale developments- do DBC envisage that the proposals will apply across ALL development, regardless of size?

Across Dacorum there is a vast increase in population and this proposal seems to lack any mention of services and adequate provision in relation to school places, indeed, as mentioned above there is only a cursory mention of healthcare provision and this section appears to be particularly light on detail whereas the document has taken time to designate a minimum space requirement for a balcony.

This proposal is looking at future growth and there appears to have been no consideration of the provision of anything other than the minor mention of 'healthcare', the lack of consideration relating to hospital services appears to fail to address the gravity of considering major growth within such a large town and the subsequent necessary provision of suitable, local services.

This matter should be considered as crucial to any future proofing of a development plan (unless there is to be an additional supplementary document to address this very important matter).

An additional note on parking (two local examples that we see in / near Nash Mills)

- Apsley Lock (just outside Nash Mills) – a very attractive development, initially built with grass verges along both sides of every road. Within a short period, many grass verges were ruined by parked cars and, eventually, ruined verges were replaced with concrete to make space for parked cars. There is still a huge parking issue in this development and the number of cars forced to park on verges makes the development look much less attractive than originally intended.

	<ul style="list-style-type: none"> Nash Mills Wharf – Built with the same parking standards but the roads in the development are privately managed, therefore people living there do not see the issue of cars littered around the development. The surrounding roads bear the brunt of insufficient parking on the development. <p>Whilst there is a need to avoid streets littered with cars, creating the right parking offering in new developments (rather than not providing it and hoping people will not own cars) would be more acceptable. Lack of decent parking provision means that cars are parked around developments in a very unattractive manner. Cars parked in appropriate places (dedicated spaces, driveways, etc. are not an eye sore. It only becomes so when people are forced to use areas that should be pedestrian / green spaces.</p> <p>Mixed use of developments</p> <p>In new developments, the mix of housing, commercial facilities, social, green spaces, etc. is well intentioned. However, we have seen examples where commercial and social elements have been removed in later iterations of plans so that developments become purely housing. Will these new documents protect from this in the future (both housing and employment developments)? Will councils and Development Management Committee be able to use these documents to oppose planning that do not meet the criteria?</p>
Include files	
ID	DSDG31
Person ID	868491
Full Name	Mr Graham Hoad
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>Tring is blessed with a marvellous hinterland. The Guide is welcomed as a tool to promote good quality design and to safeguard the natural and built heritage.</p> <p>Recent examples of poor outcomes are sadly evident. The intrusion of banal executive homes at Hastoe near Tring comes to mind. Hopefully the Guide will lead to a more sensitive and contextual approach to developments in the future.</p>
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	I have said no because although the design principles are fine and I agree with a lot of what is set out, I think many small developers, small builders and many of the public will find it too tenuous. Non Dacorum references are confusing. Although it is

	<p>said that development proposals might follow the prescriptive guidance, I think the prescriptive elements might be even more explicit but allowing always for creative and imaginative alternatives. For example I find AVDC's guides straight forward and easily understood.</p> <p>The emphasis on quality is to be commended. Unfortunately I think that needs to be matched by a commitment by central government. The failure to implement Passive House energy saving standards, capping Local Government budgets and powers to build, and the impending relaxation of Planning Controls, are measures that have not taken the right direction. Some of us are old enough to lament the abandonment of Parker Morris standards.</p> <p>Development needs to be balanced and there needs to be more effective controls to ensure that there are adequate schools, surgeries, shops and employment centres within the fabric of housing expansion. (See also Q3 below).</p> <p>Apart from the issue of quality of build and the public realm, the need to address the effects of climate change, are now real. The value of trees and shrubs in the public realm and gardens to provide shade, cooling, acoustic barriers, wind speed moderation and dust filtration is well known. But in Tring we have lost trees in pavements due to lack of maintenance, and shrubs in front gardens due to the making way for concrete paving. (See below for comments on parking).</p> <p>The guide's promotion of PV panels, EV charging points and shading is welcomed. I believe passive cooling is now an issue, and will play an important role not only in offices (See Q3 below) but also housing if, in the future, proliferation of domestic cassette A/C systems is to be avoided.</p> <p>The promotion of small scale children's play areas within residential neighbourhoods is an attractive idea. However, experience in Basildon 50 years ago found that such features were prone to dog owner's misuse, resident's objection to children's noise and ultimate re-appropriation as car parking spaces. Careful design and siting would be necessary to achieve a successful arrangement.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>I have said no because although the guidance is fine, the reality is that at the moment the policy on employment seems outside of Dacorum's control. Using Tring as an example, there has over the last forty years been a outcome totally at variance to the good intentions embodied in the Guidance. Most of the small scale local sites of employment within walking distance in Tring have been converted into the more lucrative form of flats.</p> <p>Nicely designed office blocks and facilities are to be applauded but if they are all in Maylands Avenue that is not much use to the people of Tring or other towns on the outskirts of Hemel Hempstead. Local sites of employment have the advantage of reducing the need for transport, car journeys and parking as well as aiding workers with young families by reducing travel time to work.</p> <p>Promoting energy efficiency in the construction of new office buildings is important and here the use of thermal mass and computer controlled ventilation could be added to the techniques that can be applied. For reference see the Network Rail HQ at</p>

	MK and the Council Offices at Bury St Edmunds. The benefit can be the reduction in the need for, or avoidance of air conditioning. That said, the preference should always be to find a way to reutilise an existing structure and save on embodied CO2 demand. Lobbying the Government to reverse the application of VAT on renovation over new build is long overdue.
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	<p>The improvement to rail links along the Euston line can presumably only be made with County Council funding or through contributions from Section 106 agreements. From the perspective of the Tring experience; the pedestrian and cycle link to the station is poorly maintained and un-lit, the bus service stops early at night and car parking is expensive and at times over-subscribed (The current Covid situation an exception).</p> <p>Car parking within the town is a problem. Cars seek the alternative of street parking to avoid car park charges or simply because the existing short term town centre car parks are full. The situation is about to get far, far worse once the housing in LA5 is complete. There appears to be no strategic solution. The opening up of TTC Market space in Brook Street is a possibility but otherwise further car parking will be intrusive and likely to involve walking a short distance which seems to be unpopular.</p> <p>Car parking within residential areas in Tring has now become critical. Areas of Tring resemble one big car park. Cars park on the pavements. The relaxation of car parking standards in residential developments has not helped. There is an average of 2.5 cars per household in most parts of Tring but far fewer off road parking spaces. The Chapel Meadow development was an example from the recent past where adequate provision for residents and visitors was made and (with one frequent exception) there is no need for on-pavement or in-road parking. But in other cases management interventions exacerbate the situation. An example is at Massey Court Brook Street Tring, where although there is provision of spaces, visitors resort to parking on the pavement through lack of permitted access to the empty spaces.</p> <p>A strategy for the resolution of the parking dilemma needs to be implemented but will not be achieved without realistic standards for off street parking. Imaginative solutions involving planting, screening and surface treatments will be necessary to avoid the proliferation of more bland concrete paving.</p>
Include files	
ID	DSDG32
Person ID	1250016
Full Name	Leanda Richardson
Organisation Details	Vice chair Wendover Arm Trust
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?	Yes

* Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	<p>Wendover Arm Trust (WAT) is a registered charity which has been established to restore and ultimately re-water the Wendover Arm Canal, part of which is located in Dacorum Borough Council. We work closely with the Canal and River Trust who own the canal and oversee the work we undertake.</p> <p>Historically WAT has focused on the canal restoration itself, but we are increasingly interested in promoting the wider benefits to create a desirable destination for the local community and visitors alike. It is in this context that we are supportive of the draft strategic design guide and particularly welcome the references to blue and green infrastructure, biodiversity, health and well-being, and local heritage.</p> <p>We do have some specific comments as follows:</p> <ol style="list-style-type: none"> 1 We note the positive and specific reference to the Grand Union Canal, it being highlighted as a historic highway and leisure attraction. We would like to see similar reference made to the Wendover and Aylesbury Canals, both of which have stretches situated within Dacorum. 2 We strongly support government policy regarding active travel and believe the canal infrastructure and its towpaths offer a means of achieving this. We are aware of Buckinghamshire Council's interest in developing the Grand Union Canal Triangle as a footpath/cycleway along the Aylesbury, Grand Union, and Wendover Canals. We would welcome further opportunity to promote the development of this route through Dacorum's Strategic Design Guide.

	<p>3 We note reference to the overall importance of historic legacy and would suggest additional and specific reference to canal heritage in this respect. We are of the view that any future development alongside the canals must be designed in a way which is in keeping with its surroundings in order to enhance the waterside frontage.</p> <p>4 We support ongoing and increasing emphasis on green infrastructure and would like to see the guidance used as a means of promoting the canals and their surroundings as attractive green corridors. This will help incentivise investment in health and well wellbeing, promote socialisation and a greater sense of outdoor community.</p> <p>5 We recognise the increasing need to enhance biodiversity. We see the restoration of Wendover Canal as a great opportunity to achieve this through our own work and via developers needing to uphold their own responsibilities. This is dependent on a co-ordinated approach to biodiversity net gain and we think there is further scope for the design guidance to promote such opportunities</p>
Include files	
ID	DSDG33
Person ID	1250015
Full Name	Miss Velda Wong
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>Part 1</p> <p>Page 20 – Under ‘Other Legacies’, Historic Landfill should be included. There are 70 Historic Landfill sites within DBC. Alternatively, this could be included on Page 31 under ‘Observing: Land Use’</p> <p>Reasons: The Environment Agency (EA) require Local Planning Authorities to consult with them about all applications they receive to develop land within 250 metres of landfill sites (including any land that has been used as a landfill site within the past 30 years or is likely to be used as one in the near future). Refer to https://data.gov.uk/dataset/17ed194f6de3-4034-b66b-004ebd0dd010/historic-landfill-sites</p> <p>(Minerals and Waste Policy Team Comments)</p>
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	<p>Part 2</p> <p>Page 28, section 8.6 – This section should mention the opportunistic extraction of minerals for use on site prior to non-mineral development. Opportunistic extraction refers to</p>

	<p>cases where preparation of the site for built development may result in the extraction of suitable material that could be processed and used on site as part of the development. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. Refer to Adopted Minerals Local Plan Policy 5 (Minerals Policy 5: Mineral Sterilisation).</p> <p>Page 29, section 8.8 – This section should refer to the Sustainable Hertfordshire Strategy as Additional Guidance.</p> <p>(Minerals and Waste Policy Team Comments)</p>
Include files	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>Part 3</p> <p>General comment: The county council's Waste Site Allocations Development Plan document identifies a number of Employment Land Areas of Search (ELAS). It is considered that ELAS that are predominantly used for general industry (B2) and storage and distribution (B8) are therefore compatible with waste management uses. DBC should be mindful of the potential for waste management facilities to come forward in Employment Areas throughout the remainder of the life of the adopted Waste Local Plan.</p> <p>(Minerals and Waste Policy Team Comments)</p>
Include files	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	
<p>If yes, please provide you comments along with any supporting information you may have.</p>	
Include files	
ID	DSDG34
Person ID	775876
Full Name	Mr Henry Wallis
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	Very generic - nothing specific to Dacorum. Wondered why DBC needed to produce this doc as opposed to it being a generic Govt one.
Include files	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the</p>	No

<p>10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>As a non-planner I found a lot of the language of the principles very unclear/vague as to what exactly they would require "specifically".</p> <p>Based on previous experience with SPDs, the issue is that although set out, they are not then enforced by DBC. I am thinking of several examples during LA3 compared to the master plan. How do we know that this will not happen with these? What will be done to ensure that they are enforced?</p> <p>How do you ensure that these principles will be flexible with changing standard? eg move from gas boilers to heat pumps later this decade?</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>No specific views other than to query the impact of more people working from home post Covid-19 as seems to be the recognised trend.</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>disappointed that such documents put out for public consultation contain errors. eg on effective page 1 of doc 1 there is a red box entitled "insert map of Dacorum". There are also 2 x "insert specific policies here".</p> <p>Does make one wonder what else has been missed/omitted.</p>
<p>Include files</p>	
<p>ID</p>	<p>DSDG35</p>
<p>Person ID</p>	<p>1250021</p>
<p>Full Name</p>	
<p>Organisation Details</p>	<p>Hallam Land Management Ltd</p>
<p>Person ID</p>	<p>1250020</p>
<p>Full Name</p>	<p>Mr Jim Rawlings</p>
<p>Position</p>	<p>Planning Assistant</p>
<p>Company / Organisation</p>	<p>Roebuck Land & Planning</p>
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>The broad categories are well considered and a comprehensive structure on which to base Part 2 of the Strategic Design Guide. We do have concerns in respect to the level of prescription and feel some degree of flexibility must be allowed. Comments in respect to this are expressed in our response to Question 4.</p>
<p>Include files</p>	

Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

- * Yes
- * No

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

Include files

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

- * Yes
- * No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

Include files

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?

- * Yes
- * No

If yes, please provide you comments along with any supporting information you may have.

Yes

Paragraph 6.4.3 makes reference to meeting the Nationally Described Space (NDSS) and exceeding them for family-sized dwellings. Whilst the term 'family sized' dwellings is not defined, we would assume the guidance is targeting large 3 bedroom, 4 and 5 bedroom dwellings. Typically, new houses within this category would already meet the minimum GIA sizes in NDSS and we can see no justification for seeking to exceed the standard. Affordability of housing in Dacorum will not be helped by making family houses larger, more expensive to build and more expensive to purchase. Reference to family housing exceeding the NDSS should be removed as it will run counter productive to more strategic housing aims of the Council.

Paragraph 6.5.1 indicates that built-in storage provision should comply with the areas set out in the NDSS. Our comments in respect to Para 6.4.3 apply and increasing built-in storage will necessitate an increase in dwelling floorspace which will make homes more expensive to purchase. Reference to NDSS should be removed.

Paragraph 6.6.4 requires that flues and service risers should not appear on principal façades. In some cases this will simply not be possible- one example being mid-terrace homes. The aim to reduce flues and service risers on key elevations is supported but the wording needs to be more flexible to allow for instances where this is not possible. We suggest the wording be amended to state "flues and service risers should generally be avoided on principal façades".

Paragraph 8.1.3 places an onus on applicants to demonstrate the route toward achieving zero-carbon homes in their proposals. This guidance does not accord with the provisions of the Deregulation Act 2015 which requires that local planning authorities should not set any additional local technical standards or requirements relating to construction or performance of new dwellings.

Section 42 of the DA 2015 introduces various 'optional requirements' into the Building Act 1984 ("BA 1984"). The BA 1984 empowers the Secretary of State to make building regulations establishing the standards which must be met by building work.

The Ministerial Statement (HCWS488) details how the various changes should be applied by local authorities. It confirms that the optional requirements will apply to water and access, and a new national space standard. The statement goes on to explain:

“ local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.”

It is also clear that planning authorities should not set policy requirements relating to the construction, internal layout or performance of new dwellings.

With regard to energy efficiency requirements, these should not exceed a Code level 4 equivalent. Furthermore, in terms of implementation, it is not possible for local authorities in England to impose conditions on planning permissions for dwellings which exceed a Code level 4 equivalent.

The requirement for applicants to show the route to achieving zero-carbon dwellings (including through carbon off-setting) runs counter to the spirit of the legislation and paragraph 8.1.3 should be deleted.

Section 8.7 relates to creating opportunities for on-site energy production; the aim being to secure carbon free energy production on site. Paragraph 8.7.1 requires the Installation of solar panels and battery storage in homes and commercial buildings. Paragraph 8.7.2 indicates that large developments should incorporate sustainable district heating and power networks (CHP).

As has been stated in relation to paragraph 8.1.3, these requirements go beyond the requirements of primary Legislation and should be deleted.

Section 10.5 relates to ensuring quality is secured at the planning stage. This aim is not disputed. However, the drawing scale showing the details sought is simply excessive.

Paragraph 10.5.1 states that applicants should submit 1:20 bay studies (including part elevation and associated sections) of typical elevations. Whilst we have been unable to establish what a “bay study” is, the requirement for 1:20 drawings of architectural details is excessive at the planning stage. Conventionally, elevation drawings are at 1:100 scale and it would be more appropriate to seek 1:100 for elevations. Specific design details shown on facades could be adequately shown on 1:50 drawings.

Paragraph 10.5.2 requires applicants to submit 1:20 details of key hard and soft landscape features. We question whether this is a typographical error. A 1:200 drawing is sufficient to show details of landscape works. A smaller scale than this would result in a vast number of landscape drawings (particularly for large sites) which would be hard to read together and a waste of paper if printed. The required scale should be changed.

Include files

ID

DSDG36

Person ID

1059783

Full Name

Mr Ryan Emmett

Organisation Details

Person ID

Full Name

Position

Company / Organisation

<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes * No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>I think they will achieve an adequate level of design quality in new development, provided that this new design guide is properly adhered to in the planning process and developers give sufficient effort to follow the design principles. Often developers/housebuilders try to wriggle out of their obligations once they have achieved planning permission (as we all know) and this has to stop!</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>Dacorum BC should not be afraid to encourage higher density development of exemplary design standards that encourage walking and the public realm, particularly if it will reduce pressures on its surrounding countryside and green spaces (that does not have to mean encouraging high-rise development!) People will be more receptive to new development if its of high quality, is not disproportionate and integrates properly with the existing fabric.</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>I think it's welcome that DBC have produced a design guide and i would say that at the most basic level the following criteria should be given the highest weighting when assessing the design quality of new (especially housing) developments:</p> <ul style="list-style-type: none"> -is the design based on a traditional street layout and one that maximises walking (for everyday A to B trips)? -does the development have sufficiently high quality aesthetic appeal (ie ensure it is not built out of poor quality cheapo-looking materials / encourage the use of brick and stone building materials where possible) -does the design integrate sufficiently with the existing and surrounding urban environment? -encourage active ground floor uses where possible (as part of a street layout) and use average development/population density as a parameter for promoting viable mixed use areas and public spaces.

Include files	
ID	DSDG37
Person ID	369415
Full Name	Mr Dacorum EnvironmentalForum
Organisation Details	Chair Dacorum Environmental Forum Waste Group
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	Under "Dacorum's Design Aspirations" it is acknowledged that "DBC has declared a Climate Emergency and is committed to fostering genuinely sustainable communities that support a zero carbon future." DEF wholeheartedly supports this commitment. However, see our response to Part 2.
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	The Design Principles state that "Designs should demonstrate: 8.1.1 BREEAM Standards Design certificates of a minimum level of 'Very Good' for buildings below1000m2 and specifying a minimum BREEAM level of 'Excellent' for each non-residential building of 1000m2 or more. 8.1.2 BRE's Home Quality Mark Five Star for all residential buildings. 8.1.3 Route toward achieving zero-carbon homes. This may be achieved through certification such as Passivhaus or appropriate carbon offsetting. 8.1.4 'WELL Building' standards for all commercial buildings." and there are proposals to "Conserve Energy and Reduce Carbon Emissions"(8.6) and to "Create Opportunities for Energy Production" (8.7) These targets are not sufficiently ambitious, or easy to relate to Carbon Reduction. BREEAM for example is a composite of scores based on a number of factors, only one of which is energy reduction. It was presented by BRE personnel and extensively discussed at the Dacorum Environmental Forum meeting in February 2016. A more specific and ambitious standard akin to Germany's KfW-40-Standard is called for. From our experience in trying to persuade DBC planners and /or developers to go beyond the legal minimum in the case of the LA3 development

	ensuring this will be a challenge, but the Climate Emergency is an even bigger challenge, and within the timescale of this plan there should be opportunities to tighten up here using the channels of communication and consultation between Dacorum and central Government.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	<p>DEF supports the proposals that emphasise sustainability, but the guidelines in Documents 1 and 2 are insufficiently specified, and thus can easily be circumvented by developers. For example, the proposals for using existing technology outlined in section 8 for combating the climate crisis say “should”, rather than “must”. Para. 8.1.3 “Route towards achieving zero carbon.....” should take full account of the fact that technology already exists to achieve zero carbon, and should therefore be written as an obligation rather than an aspiration. It is generally agreed that future retro-fitting would be more expensive.</p> <p>To be worth the paper it is written on, the force and applicability of the current Design Guide needs to be more securely founded than apparently the Council's Adopted Core Strategy was. DEF raise this because of our experience arising from our outstanding complaint about the way the Planning Application for LA3 was approved November 2019. Our complaint included references to Core Strategy Policies and pointed out that a number of these policies were being flouted by the LA3 Master Plan. The Council's reply, for which we requested a review on March 25th this year, stated that it was not the case that Council's policies should be binding.</p> <p>DEF remain very concerned about the loss of Green Belt over a massive swathe of the lower Gade Valley which is of great landscape value but which is under threat from the Garden Communities proposals. The views in a North Easterly direction over the Gade Valley are some of the best in Dacorum. Urbanisation of this rural panorama would be a tragedy and a great loss to Hemel Hempstead. The Borough should adhere to its own assessment of the area in its 2017 Schedule of Site Appraisals which was to “Exclude from further assessment and retain as Green Belt.”</p>
Include files	
ID	DSDG38
Person ID	1250022
Full Name	Mr Michael Ridley
Organisation Details	
Person ID	

Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	Please see my response in Question 4
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	Please see my response in Question 4
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	I am not qualified to comment on these issues
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	<p>I have not looked at document 3 (employment), as this is outside my area of expertise.</p> <ul style="list-style-type: none"> As a general comment, I feel concerned that DBC is currently working towards a new Local Plan, a Spatial Vision document for the Garden Community, and this document. There is a danger of duplication of effort, or worse, contradictory proposals being put forward. I am also concerned that with Government plans to radically overhaul planning processes, these ideas will have to be rethought when the new regime is announced. <p>The proposals (specifically those in document 2) include excellent and foresighted concepts for the future, and if they are implemented will lead to a stimulating, and lively community. The exemplar illustrations from developments elsewhere are inspiring, and engender a feeling of excitement looking to the future, but without making the specifications more watertight, an opportunity for Hemel Hempstead to become a leader in urban design and a model for other local authorities to follow in combating climate change will be lost. Moreover, the proposals are based on “comply or justify” principles, but the guidelines in documents 1 and 2 are insufficiently specified to enable non-compliance by developers to be demonstrated, thus being easily circumvented. In particular, the excellent proposals using existing technology outlined in section 8 for combating the climate</p>

	<p>crisis are specified as “should”, rather than “must”. Clearly, a developer or architect should be allowed to utilise their own judgement in how to achieve virtually zero carbon status, but they must demonstrate that the lowest possible carbon consumption will be achieved, using existing technology, of which those illustrated in section 8 are exemplars. 8.1.3 “Route towards achieving zero carbon.....” ignores the fact that technology already exists to achieve zero carbon, so this must be written as an obligation rather than an aspiration. Clearly, new technology will emerge, but this will not necessarily be cheaper than currently available, and in any case retro-fitting in the future is the most expensive option.</p> <p>I am also concerned about the loss of iconic outstanding areas of rural infrastructure which appear to under threat by the Garden Community plans, even if these are not technically within the Chilterns AONB. The views in a North Easterly direction over the Gade Valley constitute some of the gems of Hemel Hempstead. The ideas concerning the garden community are extremely positive, but the loss of this rural panorama would be a tragedy and a great loss to the town. The Borough’s own assessment in 2017 concluded “Exclude from further assessment and retain as Green Belt.”, and although this assessment was in a draft document, the recommendation should be followed.</p>
Include files	
ID	DSDG39
Person ID	1250019
Full Name	Cllr Nick Hollinghurst
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>It is a thorough and impressive document and I note that it is written on the basis that "DBC has declared a Climate Emergency and is committed to fostering genuinely sustainable communities that support a zero-carbon future." This I agree with but feel this should have been more explicitly stated at appropriate points in Parts 2 and 3.</p> <p>The following sentence is "Sustainability needs to come in the form of technology" this is obviously true, but rather more important is the need for this to be firmly underpinned by changes in social, institutional and political attitudes that lead to fundamental changes both in perceptions of the global situation and in everybody's behaviour.</p> <p>Furthermore it refers to national-level planning policies and guidance without describing in any way what those might be and in particular not outlining the statistical and evidential basis of the quantities of housing with which we might be expected to have to deal.</p>
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	No

* Yes
* No

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

In many ways an inspiring document but already looking out of date in some areas. In particular I liked 2.3 Land Use 3.3 All places accessible to everyone 3.4 Integrate play 4.2 Socially connected 4.5 naturally connected (especially 4.5.1) 4.7 Sustainably Connected - could be expanded by reference to cycle parking and e-bike charging at appropriate points along main bus routes (for multi-mode journeys e.g. cycle to get bus to station) and also by reference to taxi park/pick up points with EV top up facilities - but good to see 4.7.6 envisages pod access (if that ever happens).

5.10 Reduce car dominance needs amplifying. Speed limits of 20 mph are needed for all residential areas and past schools. Estates need to be built with increased power supplies. Public charging points for cars and e-bikes need to be provided in at least 50% of public car parks and enough electrical capacity for homes to be able to instal home chargers for cars and e-bikes. 5.10.2 should take into account modern traffic calming measures like low profile speed tables across most of the road (apart from cycle channels at edges). Tring example - the speed cushions in Grove Road (30 mph max) do work but have given rise over the years to many complaints, but the new speed tables in the Christchurch Road (20 mph max) have been well accepted with (after a year) no complaints at all and are also effective as reminders.

5.11 "Car Parking Integration" is generally good esp. 5.11.3 "Shared space and Home Zones" however I feel parking on footways must be stopped altogether. There needs, however to be a recognition that tradesmen need space to park their vans and also many employers allow and expect their employees to take a van home so that they can set off from home early to get to a distant job e.g. somewhere in London or the midlands. Post covid- with more people working from home this is likely to be an increasing trend as more people will be based at home for part of the week.

The glazing referred to in 6.4.4 well need to be a type of glass which can minimise solar heating in one direction and inhibit loss of heat in the other ("reverse greenhouse effect")

6.5 "Storage" needs to ensure garages are wide enough for people to be able to comfortably get in and out of cars in the garage - or the garage WILL end up being a store shed as per usual!

6.7 "Utilities" 6.6.3 (sic) meters are moving to become "smart" and capable of being read remotely. Omitted however is the consideration with a trend to homeworking all new dwellings need to have high/speed fibre optic cable broadband built in.

7.1 ""Attractive Safe & Usable Walking & Cycle Routes" An excellent design aim but in 7.2 Cycle Parking low power 13 amp e-bike shargers should be mentioned in each of 7.2.1, 7.2.2 and especially 7.2.3

7.5 "Food Production". Sorry, whoever wrote that has never tried to grow vegetables. It's REALLY difficult and the season is short. Plus you need lots of space. Not practical.

7.6 "Effects of Pollution". We must electrify transport fast. We need By Laws across urban areas of Dacorum to ensure the growing number of home deliveries are made in electric vans, all taxis EVs or petrol PHEVs and all buses are Diesel Mild Hybrids. For surviving internal combustion vehicles the non-idling regulations must be strictly enforced.

8.6 "Save Energy, Reduce CO2" 8.6.3 Sorry, this in NOT the thing to do. You can only get the slow charging from a street light, it's unreliable and you could have the circuit feeding multiple lights all going out at the same time. Street lights are not metered and power use is estimated - HCC would end up supplying a few people free electricity with the added cost of frequent

	<p>blackouts. Far better to facilitate home charging supplemented by fast chargers in car parks.</p> <p>8.7.1 Excellent.</p> <p>9.3 "Anticipate" Maybe pods in the future. e.g. Tring Town Centre to/from Station might make a good pod loop route in 2035 when we cease making internal combustion engine vehicles</p> <p>10.3.1 but NOT unrecyclable uPVC please!</p>
Include files	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	No
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	
If yes, please provide you comments along with any supporting information you may have.	<p>No recognition that not only is it urgent for us to convert all transport (though perhaps not HGVs) to electric propulsion, but the number of cars will have to be reduced from the current 30 million to 20 - 25 million across UK (with emphasis on urban locations), which implies an increase in public transport of all types.</p> <p>We need to consider restoring a Park & Ride scheme with chargers in the park and a route that serves station and Maylands.</p>
Include files	
ID	DSDG41
Person ID	1158356
Full Name	Colin Blundel
Organisation Details	Planning Officer Chiltern Society
Person ID	
Full Name	
Position	
Company / Organisation	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>Topography and Geology – This section is welcomed, and is essential in assessing impacts on the landscape of the Chilterns.</p> <p>Water – it is essential that the Chilterns Chalk Streams and their important ecology are recognised within the guidance.</p> <p>Green Infrastructure and Landscape – This section is welcomed, but should recognise that parts of Dacorum are located within the Chilterns Area of Outstanding Natural Beauty (AONB) and is, therefore, of national importance for the quality of its landscape. Priorities for the AONB are set out in the Chilterns AONB Management Plan.</p> <p>https://www.chilternsaonb.org/conservation-board/management-plan.html</p>

	<p>Ecology and Biodiversity – This needs to recognise the ecological importance of chalk streams and the opportunities for habitats enhancement on a landscape scale through Nature Recovery Networks.</p> <p>Connectivity – the Society supports improvements in connectivity to diversify modes of transport. In particular, the improvements of public rights of way and cycle routes in the Chilterns would help to reduce reliance on the car, whilst providing improved recreational facilities.</p> <p>Edges and Beyond – If development is to be proposed in the AONB or Green Belt it is important that greater care is taken with settlement edges to incorporate them as far as possible into the surrounding landscape and landforms. Landscape and Visual Impact Assessments should be used to assess potential impacts and inform settlement design.</p> <p>Land Use – The guide should be more definite that ancient woodland will be protected from development.</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>A Distinctive Place – The Society fully supports a focus on maintaining and enhancing local distinctiveness. The type of approach is particularly important within the AONB where development needs to complement local landscape character and the character of local rural settlements.</p> <p>A Compact Place – In a borough such as Dacorum with a high proportion of Green Belt and AONB it is essential that efficient use is made of land in existing built up areas. Increasing density in these areas should allow more scope for restricting development in rural areas, and where that development is essential, incorporating it effectively into the rural landscape. In developing more compact places, it will also be necessary to create effective designs to deal with the impacts of settlement edges on the landscape.</p> <p>A Connected Place – The Society would like to see more emphasis placed on connecting habitats through green and blue infrastructure. With the Government placing increasing emphasis on biodiversity net gain and the establishment of nature recovery networks, there is a major opportunity to establish new habitats and landscape features as part of any significant developments. These measures must be incorporated into Masterplans, with all the necessary surveys undertaken prior to any planning permission being issued. The Society is promoting a Manifesto for Chilterns Wildlife to support the management of wildlife habitats on a landscape scale.</p> <p>https://chilternsociety.org.uk/chiltern-manifesto/</p> <p>Facing the Climate Crisis – the Society strongly supports the inclusion of this section to drive a move to more sustainable designs. However, in view of the importance of the local chalk streams, the section should include a section relating to reducing abstraction of water from local watercourses, managing habitats in sustainable drainage systems, and reducing the risk of increased pollution to local watercourses.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

The Society has no further comments on this document. However, the issues raised under Part 2 above should also apply to employment uses. Particular issues to be addressed relate to habitat and landscape improvements, the efficient use of water, and the control of pollution.

Include files

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?

- * Yes
- * No

Yes

If yes, please provide you comments along with any supporting information you may have.

The Society welcomes the principle of 'comply or justify' as it will help to ensure that new developments focus on design from an early stage. However, it is essential that the Guide is used to Masterplan sites to be put forward for inclusion in a future Local Plan. Design must not be considered as an afterthought after planning permission has been given.

Relating the Vision to the Frameworks – The development of the visioning process has been well thought through. However, there is a need to incorporate community consultation into the process. Involving local people and organisations will be essential at an early stage in the design process, particularly as the proposed planning reforms will bring the final decision on whether a development is acceptable in principle forward to the Local Plan stage. The vision and design proposal must be part of the decision process and not added in at a later stage.

Landscape Framework – This section should be expanded to include consideration of views to and from the site. This is essential for sites in, and in the setting of, the AONB to ensure that visual impacts are considered in addition to landscape character.

With the recent Government White Paper proposing substantial changes to the planning system, it is currently unclear whether the design process will be undertaken at the Local Plan preparation stage or at the Reserved Matters stage. In our view, good design needs to be a determining factor as to whether the development of a site is acceptable in principle. We suggest that the Council considers how the contents of the Design Guide could be applied to the Masterplanning process ahead of sites being put forward for inclusion in an emerging Local Plan.

It is important to remember that landscape and ecological survey work needs to be undertaken early in the design stage and before a decision is made as to whether a development is acceptable in principle.

Chilterns AONB Design Guide

We would like to see the Design Guide cross-referenced with the Chilterns AONB Design Guide, which is now published, and should be referenced in an AONB policy in the emerging Dacorum Local Plan.

We hope that you can take these comments into account in developing the final version of the Design Guide.

Include files

ID

DSDG42

Person ID

1250760

Full Name

Mr Laurence Chalk

Organisation Details

Catchment Officer

Person ID

Full Name

Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	<p>1 General: The construction works and operation of any proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk.</p> <p>2 Ground investigation: Any works involving excavations below the chalk groundwater table (for example, piling or the implementation of a geothermal open/closed loop system) should be avoided. If these are necessary, ground investigations should first be carried out to identify appropriate techniques and to avoid displacing any shallow contamination to a greater depth, which could impact the aquifer.</p> <p>3 Turbidity: Excavations are also likely to generate turbidity in the aquifer, which could travel to the public water abstraction point and cause disruption to the service. Mitigation measures should be implemented and notification to Affinity Water at least 15 days prior from developers in advance of any such works, in order to intensify our monitoring and plan potential interruption of the service.</p> <p>4 Contaminated land: Construction works may exacerbate any known or previously unidentified pollution. If any pollution is found at the site then works should cease and appropriate monitoring and remediation methods will need to be undertaken to avoid impacting the aquifer.</p> <p>5 Infiltration: In certain scenarios surface water should not be disposed of via direct infiltration into the ground via a soakaway.</p>

This could be due to the potential presence of contaminated land and the risk for contaminants to remobilise, and the likelihood of surface water to carry on oil and hydrocarbons and cause groundwater pollution.

6 Drainage: In certain scenarios surface water is likely to carry on oil and hydrocarbons. It is therefore recommended that onsite drainage systems should incorporate an oil/water interceptor which acts to prevent petrol/oil being discharged into the surface and groundwater network.

7 Bunding: If any tanks, generators and filling areas are to be installed as part of the development, they will need to have secondary containment which can hold 110% of the volume the tank or generator is designed to contain. This is to prevent contaminants being discharged into the surface and groundwater network in the event of a spill.

8 Substance Storage: The installation of a leak detection system should be considered, and a procedure should be adopted that includes directly notifying Affinity Water immediately if any leakage is suspected. The Environment Agency should also be notified. This so we are able to assess the impact on public water supply and implement protection measures if necessary.

9 Water Supply: In this location Affinity Water will supply drinking water to the developments. Applications for new or upgraded connections should be done through the Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com/>) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost water mains diversions should there be any existing public water services already located on site.

10 Infrastructure (pipes etc): To check whether there are any existing public water mains running through or located near to proposed sites that may need removing, diverting or protecting, a developer will need to get in contact with the Mapping Team by emailing maps@affinitywater.co.uk. Upon request, they will issue maps of water mains which should also help identify the nearest water main for connection. For further information please see their Mapping Team webpage <https://www.affinitywater.co.uk/my-water/mapping>. Please note that map charges may apply if requesting information on a site you do not own.

11 Water Efficiency: Being within a water stressed area, we would encourage developers to consider the wider water environment by incorporating water efficient features such as rainwater harvesting, rainwater storage tanks, water butts and green roofs (as appropriate) within each dwelling/building.

For further information we will refer developers to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

Include files	
ID	DSDG43
Person ID	1170593
Full Name	W Lamb Ltd
Organisation Details	W Lamb Ltd
Person ID	1250849
Full Name	Alyson Jones
Position	
Company / Organisation	

Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?

* Yes

* No

If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.

No

Introduction

- 2.1 Part 1 of the Design Guide relates to the Design Process. The Design Process is broken down into 4 sections – Observing Place, Evaluating Place, Making a Place: Frameworks and Making a Place: Spatial Typologies. Overall, the breaking down of the process into stages is helpful and does guide the reader through the document. This breakdown into categories is not unlike the National Design Guide.
- 2.2 Given that the document is of a strategic nature, considerable focus is given on detailed matters that may end up repeated in the detailed design guide in due course. As this is a strategic level document it is felt that there should be greater flexibility and more succinct in nature, in order to allow for variation at the detailed stage.
- 2.3 It is noted that the introduction references the planned level of growth, the way spend our time and the Climate Emergency as being a driver for the guide. It will be particularly important moving forward, that viability and the uncertain economic conditions should also now be factored in.
- 2.4 The process for using the guide is set out on page 8 and whilst it provides a comprehensive overview, it does highlight the complexity and structure of the guide.
- 2.5 It is noted that the Design Guide is to apply to all applications, however it should be recognised within the document that different scales of development will require different levels of output.
- 2.6 The typologies set out in the Context section are generic and this should be recognised.
- 2.7 There is a risk of duplication throughout the report making it more cumbersome and onerous than it needs to be.

Observing Place: Checklist

- 2.8 Whilst the checklist is helpful and it is noted that the Key Outputs are meant to be prescriptive, there should be some reflection on the need and benefit for example for surveys and sections in all instances. It is also not clear on what basis the supplementary information is to be provided and whether this is mandatory. Particularly given the expense of creating 3D models etc, albeit that it will be appropriate in larger scale schemes, but this is not clear.

Ingredients of Community

- 2.9 Under 'The Ingredients of Community', it states that 'the Local Planning Authorities will particularly encourage applications from teams who... incorporate all of the placemaking and design principles (refer to the Design Principles section) into their designs, addressing the broader development challenges set out at the start of this document'. We suggest an amendment to '...incorporate all of the placemaking and design principles (refer to the Design Principles section) in their designs where possible, addressing the broader development challenges set out at the start of this document'.
- 2.10 This amendment would allow for the viability of proposals as it would allow schemes to balance physical constraints while making best and most efficient use of the land. Having to adhere to all placemaking and design principles may not allow for viability which would have a knock-on effect on deliverable housing.

- 2.11 It should also be recognised that it is not always possible to liaise with third parties in a timely manner and nor will it be appropriate in all instances and this should be reflected.

Relating the Vision to Frameworks

- 2.12 The section Relating the vision to the Frameworks sets out a requirement to prepare frameworks for Land Use, Landscape, Movement and Urban Design and requires a series of strategies to be prepared under each category. It is not clear what these frameworks or strategies should comprise which makes it very ambiguous and could result in considerable expenditure by the applicant. While the process could be appropriate in relation to some of the very large scale developments, it will not be applicable to all scales of development and all strategies may not be applicable to even a large development, let alone a small scale site. However the guide is very explicit that this process relates to all applications. There should be greater clarity provided.
- 2.13 The nature of the framework and strategies are also unclear and the process appears to be unlinked to the requirements of the Design and Access Statement which is the statutory requirement. Should these frameworks and strategies be additional or supplementary to the DAS? How much detail is required? Can they form illustrations with annotations?
- 2.14 We also note that the White Paper: Planning for the Future (2020) seeks to make the planning process faster and more succinct, however the requirements of the Strategic Design Guide while being aligned in terms of outcome in making beautiful places, they may not be aligned in terms of process. This should be recognised.

Making a Place: Frameworks Checklist

- 2.15 Whilst the checklist is helpful and it is noted that the Key Outputs are meant to be prescriptive, there should be some reflection on the need and benefit for all the outputs and whether this could be refined.

Making a Place: Spatial Typologies Checklist

- 2.16 Whilst the checklist is helpful and it is noted that the Key Outputs are prescriptive, there should be some reflection on need and benefit for all the outputs and whether this could be refined.

Overall

- 2.17 While the framework process set out is laudable and the strategies that support them, for a strategic scale guide, it is very long and very detailed. Applicants of large scale developments already follow such a process in creating and formulating masterplans, however there is a risk that the approach set out here will 'put off' applicants, particularly those with smaller scale sites. It is not clear how this process dovetails with the Design and Access Statement and the Design Code and it is notable that the Planning White Paper has an emphasis on Local Plans being kept succinct in order to be effective.
- 2.18 The above has addressed in particular Part 1. It is however noted that the key question asked is whether the Documents reflect the key characteristics of Dacorum and the wider Hertfordshire context. The nature of the document is that it is generic while being prescriptive. The examples provided are helpful and reflective of the parts of Dacorum from which they are drawn, but each site is unique, even within its own locale and this has to be reflected in overall site design on a site by site basis. There is a risk that designers and applicants will struggle to apply the process

and key characteristics into their scheme, where it is simply not appropriate. This should be recognised.

2.19 There is a significant emphasis on local character, however the Government have made it clear in the White Paper that community preferences are just as important and this has not been fully reflected in the strategic guide.

Include files

Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

* Yes

* No

No

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

Introduction

- 3.1 Part 2 of the Design Guide sets out principles. Overall the classification of design principles into categories is helpful and does help to guide the reader through the document. This breakdown into categories is not unlike the National Design Guide, although we note that the section on the relationship between the guide and NDG has yet to be completed. This will be particularly important in light of the White Paper: Planning for the Future and the National Model Design Code due to be published in the autumn. We would recommend delaying adoption of the Strategic Design Guide until after the NMDC has been published and digested and should then be fully reflected in the strategic guide, to avoid becoming out of date and irrelevant.
- 3.2 However, it is fundamentally important that Design Guides provide clear expectations and guidance with no ambiguity of language. It is also of utmost importance that Design Guides are not so overly prescriptive that they prevent development from coming forward.
- 3.3 A number of requirements within the Design Guide are too prescriptive or ambiguous and risk the success of applications being approved for appropriate developments. These representations do not comment on each requirement in turn but instead highlights those requirements which appear too onerous or lacking in flexibility. Whilst there is the chance to provide 'robust and evidence-based justification' when the Design Guide is deviated against the Guide, in numerous places, is considered too rigid.

Section 2 - A compact Place

- 3.4 2.1.2 sets out that designs should demonstrate 'walkable distances to amenities such as schools, community facilities, parks and public transport'. Whilst walking distances to such facilities are certainly a desired feature of any development, it is not to say that an application should be refused if not within walking distance of such facilities. For example, a suitable site for development with excellent quality of urban design and architecture could be refused on the grounds that a school is not within walking distance. This does not support the NPPF's overall goal to 'boost significantly the number of houses'.
- 3.5 2.1.3 requires designs to 'create low traffic neighbourhoods'. Whilst an acceptable overall principle this is highly ambiguous. What does 'low' traffic mean? Who has the final say on what 'low' levels of traffic are?

Section 3 - A place for all

- 3.6 3.1.1 – 3.1.3 requires accommodation for older people. This in principle is supported and encouraged. However,

it is noted that this Design Guide has been produced in advance of the adoption of the Emerging Local Plan. It is therefore important that the Local Plan includes policy provision relating to homes for older persons to ensure the Design Guide is rooted in policy.

3.7 Sections 3.3.3 and 3.3.4 use language such as 'regular street crossings' and 'frequent places to stop'. Such language is ambiguous and it is unclear what is meant by 'regular' and 'frequent' and yet an application could be refused if it is not deemed to meet with these requirements.

Section 4 - A connected Place

- 3.8 4.7.2 requires developments to be within 400m walking distance / 5 minute walk of bus stops from all homes. This is not possible with every development and some sites which are more than 400m / 5 minutes may still be considered sustainable. Flexibility needs to be added in to this requirement to prevent applications being refused unnecessarily.
- 3.9 4.7.4 and 4.7.5 requires the extension of existing walking and cycling routes to connect with networks outside of the site. This may not be possible to provide outside of land controlled by the Applicant or highway authority. This should be reworded to ensure that developments encourage and support such connections where possible.
- 3.10 4.7.6 requires proposals to 'future proof in anticipation of changes in transport'. This is not an acceptable or appropriate requirement to make. For example, should proposals be future proofing against transport changes that are in the immediate pipeline, or should they be future proofing against transport changes which have not been publically announced. How far will an application have to go in terms of demonstrating 'future-proofing' for it to be considered acceptable?

Section 5 - Great Streets and Public Spaces

- 3.11 This section is overly prescriptive and does not allow for sufficient flexibility with regards to design. It also fails to account for site constraints. The Design Guide should be a helpful tool when designing a scheme, it should not prescribe what can and cannot feature.
- 3.12 5.1.2 seeks to prevent the use of any cul-de-sacs. In many instances, the use of cul-de-sacs may be an appropriate response to the local character or may be a good response to site constraints. To set out clearly what a design cannot do takes away the creative side of an architect/urban designers job.
- 3.13 5.11.1 sets out that developments should integrate parking into the streetscene with 'minimal' visual impact. However 5.11.2 goes onto to state that on-street parking would be encouraged. As such the use of on-street parking is likely to impact the visual streetscene.

Section 6 - Great Homes

- 3.14 6.1 requires housing to be fit for 21st century and beyond. 6.1.2 states that internal layout should reflect contemporary living preferences with integrated kitchen/family rooms. This is one type of preference, other future residents may demonstrate a desire for separate rooms. It is not the role of a Design Guide to set 'living preferences'. Instead, local developers and householders will have a large extent of local knowledge on living preferences and should be free to provide homes in accordance with their evidence and the market demand. To this end, the Design Guide should provide flexibility.
- 3.15 6.1.3 requires homes to have electric car charging points. Such a requirement comes at considerable financial cost to developers and should be rooted in planning policy.

Such a blanket requirement may restrict some developments coming forwards. Unless such a requirement is included in policy it should not be specified in the Design Guide.

- 3.16 6.4.3 calls for family-sized dwellings to exceed sizes set out in the national minimum space standards. The national space standards set out national space standards which are considered acceptable. It should not the role of a Design Guide to seek standards which exceed national guidance.

Section 7 - Active and Healthy

- 3.17 7.1.2 requires developments to provide off-road cycle routes between homes and key destinations. This may not be possible to provide outside of land controlled by the Applicant or highway authority. This should be reworded to ensure that developments encourage and support off-road cycle routes between destinations where possible.
- 3.18 7.1.3 requires developments to provide physically segregated cycle lanes on primary streets. This may not be suitable for every site due to perhaps physical constraints which may make it impossible to provide adjacent to primary streets. In such circumstances, a separate alternative traffic free cycle route may be appropriate. This may even allow alternative, more direct routes for cyclists.
- 3.19 7.2.1 requires convenience bicycle storage at all dwellings at the ground floor within apartment building which is not often the most efficient use of space. As such, it should be reworded to provide greater flexibility, with convenient bicycle storage provided in safe and secure storage areas across a range of locations, from shared ground floor areas, through to smaller internal stores on different levels, or appropriate storage within apartments that can be utilised for general storage for non-cycle owners.
- 3.20 7.5.1 states that designs should improve air quality. It is too onerous to request that every site improves air quality and this should be reworded so to encourage improvements where possible.
- 3.21 7.5.2 requires designs to 'incorporate opportunities for food production or orchards'. It is not reasonable or suitable for every site to cater for food production and orchards (perhaps due to physical constraints). The wording of this section requires amending to encourage the exploration of opportunities for food production, rather than requiring it.

Section 8 - Facing the Climate Crisis

- 3.22 It is important that the requirements within section 8.1 comply with policy (once the Emerging Local Plan is adopted). This section seeks compliance with BREEAM 'Very Good' or 'Excellent' for non-residential buildings and BRE's Home Quality Mark Five Star for all residential buildings. Unless this is clearly set out in policy it should not be included in the Design Guide.
- 3.23 Flexibility should be incorporated within this section. For example, it may not be possible to include electric car charging points within lamp posts (8.6.3) and may not be possible to provide on-site energy generation (8.6.1).

Conclusion

- 3.24 These representations have not provided opinion on every single requirement but rather have highlighted examples where the Design Guide is unclear, uses unambiguous language or is too onerous and provides little flexibility.

	<ul style="list-style-type: none"> 3.25 It is fundamentally important to ensure that different housebuilders and developers can maintain ownership of design identity within developments. To achieve this the Design Guide should offer guidance but should not seek to stifle creativity. As set out in paragraph 126 of the NPPF, a suitable degree of variety should be encouraged and allowed. 3.26 As previously noted, the White Paper: Planning for the Future (2020) seeks to make the planning process faster and more succinct, however the requirements of the Strategic Design Guide while being aligned in terms of outcome in making beautiful places, they may not be aligned in terms of process. This should be recognised.
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Introduction (Paragraphs 1.1 - 1.5)</p> <ul style="list-style-type: none"> 1.1 These representations have been prepared by Boyer on behalf of W Lamb Ltd in response to the Strategic Design Guide (SDG) consultation (August 2020). 1.2 Boyer have been appointed by W Lamb Ltd to act on their behalf in respect of their land interests at Land at Shendish, Hemel Hempstead. The site comprises 28 hectares and is predominantly a greenfield site that is in part agricultural land and part recreational use which formed part of the grounds of the adjacent Shendish Manor. Role of Design Guide's 1.3 The growing importance of Design Guide's is clear to see in the recent White Paper: Planning for the Future. Within this White Paper is the introduction of the concept of 'planning for beautiful' in which the role of Design Guides is emphasised. In paragraph 3.4 the documents states that "it is important for the planning system to set clear expectations for the form of development which we expect to see in different location". 1.4 The Government's commitment to Design Codes and Design Guide's is clear. As such the preparation of such a detailed Design Guide by Dacorum Borough Council is commended and encouraged. These Representations - 1.5 For ease and convenience, these representations follow the questions raised within the response form. The representations comment upon questions 1, 2 and 4. <p>Question 4 Response (paragraphs 4.1 - 4.13)</p> <ul style="list-style-type: none"> The Strategic Design Guide is separated into 3 parts. Part 1 refers to the Design Process, Part 2 Design Principles and Part 3 Employment. 4.2 The NPPF section 12 relates to design. Paragraphs 124 – 126 express the importance of setting out clear design vision and expectations and that design policies should be based on local characteristics. Therefore, the

production of a Design Guide is encouraged and welcomed. It has already been identified that design and building 'beautifully' is a key proposal within the White Paper: Planning for the Future.

Production of the Design Guide

- 4.3 Little information is provided on the process behind the preparation of the Design Guide and which parties were involved in its preparation.

4.4 The White Paper: Planning for the Future is clear that Design Guides and Design Codes should have been prepared with input from the local community. Furthermore, the White Paper states "To underpin the importance of this, we intend to make clear that designs and codes should only be given weight in the planning process if they can demonstrate that this input has been secured". As such, a brief section within the document setting out the process and stakeholder engagement is encouraged.

Part 1 - Design Process

- 4.5 Part 1 sets out helpful indicators and factors that could be taken into account when considering a site. These range from historic patterns to edges, transport links and character. It is agreed that such consideration is helpful at the outset of the design stage.
- 4.6 Would be helpful for the Architect/urban designer to comment further on Part 1.

Part 2 Design Principles

- 4.7 Part 2 sets out 10 broad categories which applications will be assessed against. Our responses to question 2 sets out specific comments. However, there are a number of overarching points to consider.
- 4.8 Paragraph 126 of the NPPF states: "...*Their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified*".
- 4.9 The introduction to Part 2 sets out that applications will be judged against the Design Guide with an aim of 'comply or justify'. Where an application does not comply with certain measures of the Guide, 'robust and evidence-based justification' will be required to demonstrate why there is a deviation. In principle, the need for justification to demonstrate deviation from the Design Code is acceptable and follows the approach set out in paragraph 126 of the NPPF. However, it is important that there is flexibility built into this approach. To provide 'robust and evidence-based justification' requires substantial work and the Design Guide needs to ensure that applicants have the right to freely discuss design with Dacorum Borough Council and provide the best possible development for their site, even if there is slight deviation from the Design Guide.
- 4.10 The NPPF allows for a degree of variety and it is important to ensure that the Design Code does allow for this creative variety. There is a risk that the Design Code will limit and stifle creativity, thereby eroding developers' house types and a developer/architect's vision for the site.
- 4.11 The Design Code fails to offer guidance as to what sized development the Design Guide caters to. For example, the majority of the content of the Design Guide may be relevant to a large scale development. However, a smaller infill development cannot realistically be required to meet every requirement in the guide. This is likely to cause confusion for users of the Guide. There is an additional risk that applications for smaller scale developments have to provide extensive 'robust and evidence-based justification' for not complying with aspects

of the Design Code that the application and detail of submission far exceeds what is proportionate.

4.12 A number of requirements set out in the Design Guide would have substantial financial implications, yet the Design Guide makes no reference to this as being a valid point of justification.

4.13 Overall, the production of the Design Code is applauded and the use of Design Guides is supported. However, there must be a degree of flexibility within them to allow for creativity without requiring extensive robust justification.

Conclusion (Paragraphs 5.1 - 5.5)

- 5.1 These representations have been prepared by Boyer on behalf of in response to the Strategic Design Guide (SDG) consultation (August 2020).
- 5.2 Boyer have been appointed by W Lamb Ltd to act on their behalf in respect of their land interests at Land at Shendish, Hemel Hempstead. The site comprises 28 hectares and is predominantly a greenfield site that forms part of the grounds of the adjacent Shendish Manor.
- 5.3 The preparation of the Design Guide is commended and the growing importance of Design Guides and Design Codes through the recent White Paper is acknowledged.
- 5.4 These representations have considered the content of the Design Code and have suggested that the Design Code needs to incorporate flexibility to ensure creativity is not stifled. Suggestions have also been made to suggest that the Guide needs to be clear which sized development it relates to and examples have been given where the language in the Design Guide is too ambiguous.
- 5.5 The NPPF in paragraph 126 seeks to ensure that a degree of variety can be provided through design, which is a sentiment fully endorsed through these representations.
- 5.6 On behalf of W Lamb Ltd we respectfully request that these comments are taken into account.

Include files

ID DSDG44

Person ID 1145351

Full Name Mrs Christine Mabley

Organisation Details

Person ID

Full Name

Position

Company / Organisation

Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?

* Yes

* No

If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.

Include files

Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

* Yes

* No

<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No</p>	Yes
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Good afternoon</p> <p>My user name and password have failed to work to log me in to make my comments online via the portal so I am emailing you.</p> <p>My first impression is that some of the reports are woefully out of date such that policy changes and economic impacts are not incorporated in the documents presented. This means that particularly housing and work assessments are not adequate to inform decisions by planners. Assessment of green belt impact and connectivity are also insufficient to meet the currently changing demand for open green space for both mental and physical health and there is lip service only to assessing impacts of climate change and alternative modes of transport for connectivity: cycle tracks and footpaths do not join up and there is too much emphasis on vehicular transportation. Further there is insufficient attention to the carrying capacity of rural lanes for safe mixed use by pedestrians, cyclists and motorists.</p> <p>There is frequent mention of the potential for local planning policies to control appropriate development but there is no evidence in Dacorum that this is the case. Housing need numbers (which may of course need revising in light of Coronavirus/Covid 19 impact from 2020) have caused policies on green belt, affordability ratios, highways safety and equality of access to community infrastructure such as health and education, to be set aside west of Hemel Hempstead.</p> <p>I am disappointed that strategies to support community development should be based on such poor descriptions of the existing circumstances. Further there is a lack of ambition to conserve equally across all kinds of land use. If you are rich you are protected from change, if you are poor or a minority ethnic group with special needs, you are not.</p>
<p>Include files</p>	
<p>ID</p>	DSDG45
<p>Person ID</p>	1250772
<p>Full Name</p>	Mr Tim Hagyard
<p>Organisation Details</p>	Planning Manager CPRE - The Hertfordshire Society
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	

Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>Page 5 refers to ‘sustainability ‘ but a definition is needed . This says it will come in the form of technology.....as well as through planning of compact, well-integrated mixed use environments.’ A test that the proposed Hemel Garden Communities (Page 6) fails.</p> <p>Page 5 Refers to ‘including land formerly in the Green Belt’ when in fact we are dealing with land ‘currently in the Green Belt’ . This is both inaccurate and presumptuous.</p> <p>Page 26 – The deficiencies in east-west connections of public transport is an obvious omission to be addressed. Herts CC is looking into the A414 as a strategic travel corridor for MRT or light rail system. A strategic planning approach that CPRE support in principle to realise greater brownfield opportunity.</p> <p>Page 30 - Buncefield is one strategic brownfield development opportunity to highlight that can benefit from an east west rapid transit link to connect it</p> <p>Page 39 – some of these references are questionable in their relevance to Hertfordshire. Hoe ? Why not include ‘den’ and ‘row’ ?</p> <p>Pages 48 -83. The scenario of this whole section is that of Green Belt land allocations not even submitted, let alone approved; these allocations are not warranted by latest ONS Household Projections which show a 9% lower figure for housing need in 2036 than was used in Dacorum Borough Council's 2017 "Issues and Options" consultation (this equals 8268 fewer dwellings). The approach does not sit well with a zero carbon objective and the urgency for sustainable development. The objection is that the strategic design guide should be focussing on the integration of new development for the enhancement of existing urban areas, rural settlements and villages, for the benefit of existing residents and places. The specific example from Canterbury is not felt to be ‘exemplary’ not least by its hostile and impenetrable motorway barrier to the countryside at its edge.</p>
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	<p>Housing. The design guide currently lacks, and to be meaningful must now include, robust standards that promote suitable space for flexible home working as well as better internal space standards, cross ventilation to ensure dwellings are both cooler and can reduce the spread of infection; private outside space including balconies for all flats, healthy space standards.</p> <p>Green spaces – sustainable drainage. The guidelines for the amount of open green space required in new developments are felt to be inadequate and need firming up.</p> <p>Sustainable Travel</p> <ul style="list-style-type: none"> An explicit objective has to be low-car environments; the space demands of car ownership frustrate space standards for sustainable movement, green space as well as internal

building spaces. Part 2, 2.1 does refer to compact, walkable and low traffic neighbourhoods but a more explicit objective is needed for low car ownership.

- The existing sustainable travel corridors, and those with most potential, should be defined and then incorporated as the basis for integrated sustainable land use and travel planning. This would be appropriate to include in a strategic design guide. The east-west A414 corridor is one with potential highlighted by Herts CC and a mass rapid transit / light rail scheme is being investigated as an option.
- Design standards for movement should be generous to enhance amenity and the vital role of greenspace, but also to provide resilience to future pandemics. Covid 19 has highlighted the fundamental need for space and nature, and future pandemic events remain highly probable. Providing everyone with adequate space to move and live should be part of greater resilience in physical planning. Standard 2m wide or less footways for instance do not allow this. Walking and cycling are amongst the safest ways of travelling so this requires greater priority in road design, space allocation and more extensive public rights of way networks in existing urban areas. A strategic design guide needs to do much more to address this.

Page 8 – Existing and future neighbourhoods need to be at densities which support sustainability but without compromising minimum standards of open space, internal space standards or space for sustainable movement. The terms ‘walkable’ and ‘low traffic’ are not defined. Sustainable development is not car dependency – this should be made explicit and some measure of it agreed.

Page 20. 6.2.2 The requirement for balconies should apply for all apartments.

Page 23. Surely ‘all places’ not just ‘new’ places? We have to recognise the need to address deficiencies in existing unhealthy places.

Page 26 8.1.3 – what does ‘route towards’ mean exactly?

Page 26 8.2.2 – Delete ‘wherever possible’ as we must not import trees.

Page 27 – a ‘net gain’ approach to water run-off from all development by SuDS is fully warranted given increased extreme weather events / localised flooding and need to slow release of water to local river systems

Page 28 8.4.2 – ‘maximum’ is meaningless in this context. There seems to be denial about local water issues and the likelihood that new development will have a serious impact on chalk streams. A whole section devoted to SUDS, community-wide rainwater harvesting and storage is needed (Exeter University is doing valuable work on this subject3)

Page 31 – the potential for e-bikes, cargo bikes and e scooters and providing for them has been overlooked.

Page 32 10.2 – Long term stewardship is critical but this section needs strengthening and is simply too vague

Include files

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

- * Yes
- * No

No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

Employment.
Mixed use rather than zoned employment areas should be central to the strategic design strategy for their acknowledged wider

	<p>benefits, as encouraged in the NPPF, and as a necessary response to the changes brought on by Covid 19</p> <p>Covid 19 will bring major long-term changes to patterns of working, especially for office-based workers and to market demand. The design guide is out of date and predetermines mono uses and a separation of uses whereas, in response to the pandemic, the climate crisis and with a focus on health and well-being, a much more integrated mix of employment and residential uses should be promoted. The Innovation Quarter has yet to be assessed in a local plan but should be radically rethought as a mixed-use environment to realise new housing too. This brings diversity, interest and enables much lower car parking regimes so is therefore a more efficient use of land.</p> <p>Existing employment areas are also one of the main opportunity areas to deliver mixed uses and provide accessible good quality housing – far preferable to either the unplanned poorly designed ‘permitted development’ changes from office to residential or the barren modern ‘office parks’ that workers dislike as there is nowhere of interest to break out to.</p> <p>Page 6 E.01 – For placemaking you need a wider range of uses including residential to encourage viable hospitality and leisure uses. E.01.3 If a community hub is to be provided surely residential use is needed to support the community activity?</p> <p>Page 10 E.03.2 Harvesting rainwater should be integrated into water-using functions within a site so the word ‘could’ here is incorrect. E.03.3 the provisions have no meaning without quantification or reference to environmental standards. E.04 lacks rigour and needs a complete reappraisal and re-write</p> <p>Page 11 - The best practice examples should be ones where the water collected is available to be reused. ...a demonstration of the water cycle is needed.</p> <p>Page 12 – described as ‘multi-functional’ but in fact of course it only provides office function. Could equally work as a highly attractive mixed-use environment with focus on science.</p> <p>Page 14 –E.05.5. We propose this be redrafted to simply ‘require zero carbon buildings’</p> <p>Page 20 - E.10.4 – Presumably this means to say ‘car bans’. The use of technology can be applied to localised areas with charging as a means, for instance, to limit vehicle use to ‘electric only’.</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>General</p> <ul style="list-style-type: none"> • This SPD lacks standards, details and is premature. It presumes huge Green Belt land allocations in a Local Plan which is yet to be submitted let alone adopted. CPRE Herts argues for a ‘paradigm shift’ to realise the opportunities of brownfield land, the best focus for place-making, investing in the quality of life of existing towns and places, as part of a sustainable travel-led strategy. • While the SPD espouses quality places, and is attractively presented, much of the material appears to be re-cycled from other assignments. It would have been better for

Dacorum to have engaged consultants with a better understanding of the local environmental context, not least the stress new development results in for the local water environment.

CPRE Herts accordingly objects that this document:

1. Is premature in advance of a Local Plan presuming a land allocation and a 'growth' agenda which sees unwarranted poorly located development sprawling across established Green Belt and countryside, in locations that cannot benefit from sustainable transport corridors or infrastructure.
2. Is out of date given the seismic impacts and experience of the Covid 19 pandemic (never mentioned) on work and living patterns, use of technology, the need for local employment etc,
3. Fails to offer a genuinely sustainable strategy based on human well-being, one that addresses the climate crisis. This would value and presume to enhance the countryside as a first principle and see land use planning fully integrated with sustainable travel investment.
4. Includes separate residential and employment land design guides, at odds with a simpler zonal approach, when it is mixed-use design guides that are needed to promoted walkable neighbourhoods. Strategically these would be highly relevant to key brownfield sites - the boxlands (Footnote 1: Building Better Building Beautiful Commission 'Living With Beauty' report Jan 2020 proposed to 'banish boxlands' – proposition 26. https://www.gov.uk/government/uploads/attachment_data/file/86827/boxlands.pdf of space hungry and car dependent leisure, employment and retail parks that need to be reimaged and replanned
5. While the design guide contains much analysis and ideas that are good, this must more clearly apply across the board, to retrofit existing towns and places, The SPD is too much a guide for large poorly located edge of settlement green belt sites.
6. Lacks priority design objectives, the key principles of which should be net-zero carbon, climate change mitigation, health and wellbeing, active and low-car travel, biodiversity enhancement, countryside protection and community needs.

Long term place-making

- Directing development investment to opportunities within the existing urban footprint, fabric and building stock is the best way of enhancing places and addressing social needs, the need for green infrastructure (street trees) under the long-term oversight of an active and accountable local authority.
- Visions of new development (Footnote 2: Visions and Reality by Transport for New Homes June 2020. <https://www.transportfornewhomes.org.uk/wpcontent/uploads/2020/06/garden-village-visions.pdf>), especially on greenfield sites. often do not match the built reality on the ground, as developments are 'value engineered' and volume housebuilders draw out timescales and seek profit maximisation. If investment flows to sprawling greenfield 'utopias' then accordingly nothing much happens for existing places which are left behind. It is part of a debate about 'levelling up' which exists at the local and regional level as well as the national level.

Include files	
ID	DSDG46
Person ID	1250778
Full Name	Mr Anthony Collier
Organisation Details	

Person ID	
Full Name	
Position	
Company / Organisation	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>Dacorum's Design Aspirations - Page 5 Paragraph 3 – need to add that there needs to be sustainable mix-use environments.</p> <p>Context: Green Infrastructure and Landscape Page 16.</p> <p>Paragraph 1 – need to add that green infrastructure corridors could be used to encourage the use of sustainable modes of transport.</p> <p>Context: Historical Legacy; Other Legacies Page 20. Ancient tracks and historic way-markers – Possible expansion to highlight Rights of way, country lanes and general historic street layouts designed for pedestrians, and only adapted for motor vehicles in the previous 100 years.</p> <p>Context: Connectivity Page 26. Paragraph 1 – need to link 'connectivity' to key LTP4 policies including Policy 1, 7, 8, 9 and 10 and supporting strategies.</p> <p>Observing: Connectivity Page 27.</p> <ul style="list-style-type: none"> • Need to be more explicit in relation to sustainable modes of transport (need to spell things out more). • Wider Context: Left Hand Box (Understand) Bullet Point 1 – needs to read: 'Pedestrian and cycle networks surrounding the site.' Left Hand Box (Understand) Bullet Point 3 – needs to read: 'Public transport networks (including bus and rail networks).' Right Hand Box (Examples of What to Observe) Bullet Point 1 – needs to read: 'Public Rights of Way, National Cycle Networks and Public Transport Networks.' • Site Context: Left Hand Box (Understand) Bullet Point 1 – needs to read: 'Links and connections to wider pedestrian, cycle and public transport networks.' Right Hand Box (Examples of What to Observe) Bullet Point 1 – needs to read: 'Walking, cycling and public transport networks.' • Outputs: Right Hand Box (Supplementary Information) line two needs to read: 'Walking and cycling times studies.' <p>Context: Edges and Beyond Page 28.</p> <ul style="list-style-type: none"> • Nearby Facilities - Need to add a paragraph after bullet points that emphasize the need to consider the connectivity of nearby facilities and amenities in order to reduce the need to travel by car. • Amenity Capacity - Paragraph 2 – need to highlight that the development of new or enhanced amenities offers the opportunity to improve provision for existing residents reducing the need to travel. • Edges - Paragraph 3 – should emphasize that Transport Infrastructure edges are important in that they provide good connectivity to the surrounding area. <p>Observing: Edges and Beyond Page 29.</p> <ul style="list-style-type: none"> • Need to be more explicit in relation to connectivity (need to spell things out more). • Wider Context - Left Hand Box (Understand) Bullet Point 4 – needs to read: 'Amenity provision and capacity and how connected they are to the surrounding area.' Right Hand Box (Examples of What to Observe) need to add another bullet point that reads: 'Walking and cycling routes.'

- Wider Context - Consideration should also be given to the current desires to mask the front of development or set back from existing streets (typically with a vegetation strip then small service type road) , and the balance of an active frontage with passive surveillance over hard, impermeable fronts that give nothing back to those travelling along the street. Active frontages assist many highway users and reduce speeds in urban settings.
- Site Context - Left Hand Box (Understand) Bullet Point 5 – needs to read: 'Effect and influence of edges on the site providing good connectivity to the surrounding area.' Right Hand Box (Examples of What to Observe) Bullet Point 3 – needs to read: 'Walking and cycling routes to provide good connectivity.'
- Outputs - Left Hand Box (Key Outputs) need to add bullet point that reads: 'Connectivity to nearby facilities and amenities.'

Context: Land Use Page 30.

- Education and Sports Facilities
Paragraph 1 – need to add that as school sites and sports facilities often contribute to landscape edges, they can help with reducing the need to travel by car. Possible inclusion of utility or leisure transport in the natural environment, rural and rights of way links offer excellent and attractive journey options for walking and cycling, and should be protected and enhanced, notably where existing infrastructure causes severance.

Observing Place: Example Page 44.

- The street profile presented is neither to a standard we would support, nor a design that would align with LTP4, notably having in effect two 'roads' and a total of 5 lanes of vehicles (parked or moving), no cycling provision and sub standard footpaths that do not meet minimum standards. This should be removed; we can provide examples of good/adoptable profiles if required.

Connectivity and Places to Connect to Page 45

- Need to emphasize that it is important to demonstrate the sustainability of the site and the need to reduce travel by cars.

Illustrating Strengths, Opportunities and Structuring Elements Pages 51 and 52. Need to emphasize the importance of site connectivity to the surrounding area.

The Vision Page 58. Paragraph 2 – need to highlight that an important consideration is how connected a site is to the surrounding area. Paragraph 4 – need to highlight that an important consideration is access by all modes of transport.

Relating the Vision to the Frameworks

Page 59. Movement Bottom Left Hand Box, Bullet Point 3 – needs to read: 'Consideration to walking, cycling and public transport routes.'

Land Use Framework Page 60. Consider Bullet Point 6 – need to highlight the importance of sustainable movement networks.

Landscape Framework Page 62. Consider Bullet Point 5 – need to highlight that the promotion for active travel such as walking, and cycling will contribute to healthy lifestyles.

Movement Framework Page 64.

- Paragraph 1 – need to link 'movement' to key LTP4 policies including Policy 1, 7, 8, 9 and 10 and supporting strategies.
- Paragraph 1 – need to highlight new places should be connected, by sustainable modes of transport such as walking and cycling, with existing settlements.

	<ul style="list-style-type: none"> • Inclusion of a hierarchy aligned to HCCs LTP (and manual for streets) would be highly beneficial • Statement that a street doesn't necessarily include vehicle access • Designed for all users and uses including as a place. • Inclusion of highways adjacent to sites in master planning design process • Para 5.7 Street furniture, signs, columns etc. and trees should be placed in positions to ensure the footway width is maintained at all time (there may be opportunity here to also ensure utility service boxes are not placed on footpaths etc. <p>Movement and Place Paragraph 1 need to emphasize how this contributes to placemaking</p> <p>Movement Paragraph 1: need to highlight that movement needs to include pedestrian, cycle and public transport movements.</p> <p>Movement Framework: Example Page 65. Additional Resources - it is noted that roads in hertfordshire: design guide is currently in the process of being reviewed and updated</p> <p>Urban design framework page 66 paragraph 1 - need to emphasize how this contributes to placemaking</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>2.1 Create Walkable Neighborhoods with Identifiable Centers: Page 8. 2.1.3 Need to highlight that creating low traffic neighborhoods will encourage walking.</p> <p>2.5 Use a Hierarchy of Density and Scale: Page 9. 2.4.2 Need to add here that by having facilities and amenities close to residential areas, accessible transport corridors and existing settlement the need to travel will be reduced and will encourage the use of sustainable modes of transport.</p> <p>3.1 Provide Housing and Facilities for Different Ages - Page 10. 3.1.1 Should emphasize here that accommodation suitable for older people needs to be within walking distance of local centers and facilities.</p> <p>3.3 Ensure All Places are Accessible to Everyone Page 11. Additional Guidance It is noted that 'Roads in Hertfordshire: Design Guide' in currently in the process of being reviewed and updated.</p> <p>4.0 A Connected Place Page 12. Paragraph 1 – need to link 'connected place' to key LTP4 policies including Policy 1, 7, 8, 9 and 10 and supporting strategies.</p> <p>4.1 Be Physically Connected - Page 12. 4.1.1 Need to add here that the links need to be a combination of walking, cycling and public transport links between new and existing places.</p> <p>4.2 Be Socially Connected - Page 12. 4.2.2. Need to highlight here that need to consider walking, cycling and public transport links.</p> <p>4.4 Be Economically Connected - Page 13. Paragraph 1 – need to link changing work patterns, such as home working, to reduce the need to travel.</p> <p>4.5 Be Naturally Connected - Page 13. Paragraph 1 – need to highlight that green corridors should be used where available to encourage walking and cycling.</p>

	<p>4.7 Be Sustainably Connected - Page 14. Paragraph 1 – should spell out the sustainable travel modes of walking, cycling and public transport.</p> <p>5.2 Create a Clear, Flexible Hierarchy of Streets - Page 15. 5.2.5 Need to add that there should be pedestrian and cycle priority. Additional Guidance It is noted that ‘Roads in Hertfordshire: Design Guide’ is currently in the process of being reviewed and updated.</p> <p>7.0 Active and Healthy - Page 23. Paragraph 1 – need to link ‘active and healthy’ to key LTP4 policies including Policy 1, 7, 8, 9 and 10 and supporting strategies.</p> <p>7.1 Create Attractive Safe and Usable Walking and Cycling Routes Page 23. The design principle relates to walking and cycling but apart from the title there is no reference to walking itself, and it all seems related to cycling only. Please provide clarification.</p> <p>7.2 Incorporate Cycle Parking Page 23. 7.2.2 Need to add that showers at workplace buildings could also be provided to encourage people to safely and easily cycle to work.</p> <p>7.4 Enhance Access to Sport Page 24. 7.4.2 Need to add that there should be easy, safe and convenient access by sustainable modes of transport</p> <p>7.6 Mitigate the Effects of Pollution Page 25. 7.5.1 Need to highlight that encouraging the use of sustainable modes of transport will reduce the dependency on the car and improve air quality.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>E.01 Placemaking Page 6.</p> <ul style="list-style-type: none"> • E.01.1 Need to add that it is important to provide sustainable connections between employment and residential areas to contribute to ‘Placemaking’. • E.02 Health and Well-being Page 6. E.02.2 Need to emphasize that pedestrian, cycle and public transport routes need to be provided to key destinations surrounding the site. • • Employment Design Principles: • A Multi-Functional, Natural Environment Page 10. Paragraph 1 – need to highlight that green infrastructure can be used where available to encourage walking and cycling helping to tackle climate change. • Small Industrial Units Page 24. Need to relate this section to advice and standards provided in ‘Roads in Hertfordshire: Design Guide’. • Large Industrial Units Page 25. Need to relate this section to advice and standards provided in ‘Roads in Hertfordshire: Design Guide’. • Small Office Units Page 28. Need to relate this section to advice and standards provided in ‘Roads in Hertfordshire: Design Guide’. • Large Office Units Page 29. Need to relate this section to advice and standards provided in ‘Roads in Hertfordshire: Design’.
<p>Include files</p>	

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	Hertfordshire Active Travel Projects Officer also provided a copy of Non-Motorised Routes: A Design Guide Countryside and Rights of Way Service August 2020
Include files	
ID	DSDG47
Person ID	591169
Full Name	Mrs Nicola Bull
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	Yes
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	No
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	High-quality should mean that design is not only aesthetically pleasing and fits into the existing surroundings but also that buildings are constructed with longevity and sustainability as key guiding principles. New buildings should all be orientated to maximise the use of solar energy generation and solar water heating and/or should be able to access power generated locally from ground-source or air-source heat pumps. In this way they can contribute to both increased use and generation of clean energy. While the provision of car parking that is hidden rather than on-street is a good thing, there should probably be greater recognition of the fact that even people with a garage rarely use it nowadays to house their vehicle/s. What can be done to encourage a return to the use of garages for vehicle storage? Better sizing - and provision of integral electric car charging points?
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	No

<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>There does not appear to be sufficient provision for electric car charging points. If building design is going to encourage a move away from personal car use to either public transport or walking and cycling then the plans need to be backed up by commitments from other government departments on the provision of safe cycling and walking routes (dedicated lanes that are not dual purpose and are separated from road traffic) and better and more tailored public transport powered by renewable energy.</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Part 1, Page 26: 'Connectivity to railheads is desirable' to instead read: 'The provision of public transport links to railway stations, appropriately timetabled and with capacity and frequency reflecting changing needs through the day, is highly desirable.'</p>
<p>Include files</p>	
<p>ID</p>	<p>DSDG48</p>
<p>Person ID</p>	<p>777660</p>
<p>Full Name</p>	<p>Mr Jim Grimes</p>
<p>Organisation Details</p>	
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	
<p>Include files</p>	
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<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>I have lived happily in Roseheath, HP1 2LX, Hemel for 44 years and hope to do so for some time to come. My wife and I both have Honours Degrees from the University of London, though not in Strategic Planning. The information you have made available is academic and totally beyond the comprehension or grasp of the average Hemel citizen.</p> <p>The issues regarding future planning, as far as we are concerned , are to find a sustainable and happy medium between the need to create more dwellings and the preservation of the quality of life that we have hithertoo enjoyed.</p> <p>I would describe myself, a total cynic regarding the efficacy of public consultation. This is largely due to the unsatisfactory developments where we live.To put it simply, the final plans for housing and community development in Chaulden/Fields End/Warners End district have, in no way, addressed the problem of increased pressure on local services and road traffic.</p> <p>If the planners wish to re-engage with the people of Dacorum they must listen to "common sense" responses of the people and respond accordingly. I therefore make a plea for a jargon free, Joe Public Friendly, Idiot's Guide , on a few sheets of A4 paper to replace this welter of information you have sent us. Town planners must ask themselves how they can regain the confidence of the local people.</p>
<p>Include files</p>	
<p>ID</p>	<p>DSDG49</p>
<p>Person ID</p>	<p>211496</p>
<p>Full Name</p>	<p>Mr Peter Lardi</p>
<p>Organisation Details</p>	
<p>Person ID</p>	
<p>Full Name</p>	
<p>Position</p>	
<p>Company / Organisation</p>	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes * No</p>	

<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Thank you for your email. I entered the Planning Portal but found the mode of questioning, unacceptably drawn out for me to personally participate, hence the following comments which you may find helpful but perhaps not as generally they are not complimentary about the historical planning policies of Dacorum BC. Dacorum needs a professional panel to produce a design guide that enhances development in the area which historically has been poor. I often wonder if there are any design professionals employed by Dacorum Council or amongst elected members that have any expertise in design issues, I think not. (As an aside if there was a national competition for finding the most ugly building in the UK Dacorum would win with the public toilets they created in Durrants Hill Road) Currently it is likely Dacorum is the National centre for pop-up up car cleaning venues!</p> <p>The principal entry points to Hemel Hempstead off the A41 bypass at Two Waters and the M1 J8 give a bad impression the town . The appalling and hardly visible sculpture at J8 is an example of the poor standards historically employed by the town managers</p> <p>Dacorum is fortunate to have Boxmoor which provides a green wedge into the town centre linking with the Water Garden then onto Gadebridge Park and open country beyond. Not many towns in the UK have this advantage. A further under used asset is the Grand Union canal passing through the length of Dacorum from Hunton Bridge to Tring . Does the Canal have a special Planning policy?</p> <p>These two features would form a good starting framework for the Design Guide . Currently the potential benefits of these two assets are largely ignored The people of Hemel are fortunate that the management of Boxmoor is provided by the Boxmoor Trust and not by Dacorum BC .Despite the Canal and Rivers Trust the canal does not appear to have special planning protection . A good example is the recent depressing flats off Durrants Hill Road and Red Lion Lane. Why does Dacorum fail to encourage more developments like Apsley Marina an attractive development for the general public but now hemmed in by more flats and Office Blocks (which in future are likely to be converted to flats).</p> <p>The newly formed Design Guide team could review the 1970,s Essex Design Guide which was first created in the 1970,s but has been upgraded and republished in 2018 and would make a good starting point for the Dacorum Design guide A further suggestion that your design panel could consider is to set up a strong working relationship with the Canal and Rivers Trust.</p>

	It was good to see there is a proposal for a Dacorum Design guide. I hope its creation does the job,
Include files	
ID	DSDG50
Person ID	484212
Full Name	Mr Alan Benson
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
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If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
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If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	<p>I dont see any mention in these documents wrt to COVID 19 situation now or similar in the future.</p> <p>These plans are clearly written before Lockdown and social distancing.</p> <p>What are the proposed changes to COVID 19:</p> <ol style="list-style-type: none"> 1. Non sharing of office work places 2. Larger areas to work in 3. etc <p>We are bound to get another outbreak of a COVID virus, what are the plans for that, and impact on your design and process.</p>

Include files	
ID	DSDG51
Person ID	1224096
Full Name	Mr Mark White
Organisation Details	Specialist - Planning Homes England
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>Part 1 - Design Process</p> <p>Water – traditional patterns of field drainage such as ditches not really mentioned. Also would be useful if this showed the likely issues relating to water and climate change – how will a different climate affect the water character across the District?</p> <p>Exposure – should mention wind as well, as for new developments, providing shelter from exposed windy sites makes them more livable? And also again, how will the changing climate make exposure a bigger issue?</p> <p>p. 33 Urban Grain – suggest figure ground studies should be used?</p> <p>p. 38/9 – These graphics are very much welcomed. It will be helpful to have a short video from Proctor and Matthews to talk users through it which could be linked to the SPD, helping users interpret them.</p> <p>p. 58 The Vision – this is a bit weak as currently written. A vision sets out the principles and objectives for a site and is linked to the place so its not generic and will be a mix of text, plans and sketches. The Vision is grounded in a thorough understanding of the site to identify the opportunities and constraints, but it also must mix in the aspirational/opportunity to innovate– considering how good the scheme could be. E.g this Vision for Tresham Garden Village http://www.tresham.gov.uk/wp-content/uploads/2018/03/ALL-Tresham-Exhibition-board-responses.pdf which has within it the spatial vision about connecting up the landscape shown in the attachment to this email.</p> <p>Another good example of a vision which is based on spatial understanding is Taunton Garden Town. This is shown in the attachment to this email.</p> <ul style="list-style-type: none"> • Spatial Typologies <p>The Bourne/ End Typology</p> <p>p. 78 Are the edge houses to the ‘south’ that are ‘L’ shaped; detached houses? They are linked by walls to form an edge. If they are detached, the guide should say so. As per comments above, the guide needs to be intelligible to members and non-professionals. The guide refers to terraced houses and semi-detached houses, so should refer to detached houses too where they appear.</p>
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the	

10 broad categories) will be effective in securing high quality development?

- * Yes
- * No

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

Part 2 Design Principles

- Facing the climate crisis

p. 26 The section on 'Certify Sustainability' is noted. Policy should be written within the context of the government's aim for local planning authorities to be looking to future proof or at least reference future targets within the context of national planning policy in the NPPF and PPG.

Include files

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

- * Yes
- * No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

Include files

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?

- * Yes
- * No

Yes

If yes, please provide you comments along with any supporting information you may have.

Homes England is extensively involved with development in Dacorum Borough; taking forward strategic and other landholdings for development in Hemel Hempstead and through its role providing delivery advice and support to Hemel Garden Communities. Our Strategic Plan commits us to improving design quality and we welcome this opportunity to comment on the Strategic Design Guide SPD. Our comments are as follows:

Comments:

General

- Glossary and Language

The SPD needs a glossary or hyper link for more unusual words e.g. co-axial field patterns. The SPD would benefit from the use of more simple language. This needs to be intelligible to councillors and non professionals too who won't understand some of the terms currently used.

- Scope

The Strategic Design Guide says it applies to planning applications and sites across Dacorum of all scales, for which it covers the strategic objectives and design process to which DBC expects designers to adhere – but one would not expect to have multiple frameworks for a small site of e.g. 5 new homes? It would be good to show a worked example for a small site where one might put all of the framework information onto a series of simpler plans

- Understanding Context

This is a very good high level summary of the context to show individual applicants what they need to consider – but it would be helpful to collate good examples (and the information they have found) of good analysis within Dacorum. So if you have a Design and Access statement that really got under the skin of a particular neighbourhood – this could be shared; both to encourage others to achieve that standard, but also so that other

	<p>developments can benefit from that knowledge and understanding, and save multiple consultants working on the same place.</p> <ul style="list-style-type: none"> • It will be helpful to show examples of some of the types of plans one would expect in an appendix so users can see a worked example so they know what they look like for different scales of development – not just the large masterplan example • It will be helpful to have more examples than just from Proctor and Matthews as it looks too linked to them as currently written.
Include files	
ID	DSDG52
Person ID	1165136
Full Name	Mr & Mrs J.D Battye
Organisation Details	
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?	
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?	
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	<p>The topography of Dacorum presents particular problems and some of the examples in Part 2 drawn from elsewhere are inappropriate. (Good design is inevitably subjective but the pictures from Cambridge look particularly stark, graceless and unappealing)A bottom-up, not top-down, approach is required in Dacorum.</p> <p>I do not think sufficient overall emphasis has been given to landscaping, tree-planting and enhancing biodiversity and habitats;mitigating the effects of pollution and offsetting climate change should be accorded a much higher priority if we are to serve future generations responsibly.</p> <p>The preface observes that Dacorum has declared a Climate Emergency.Unfortunately there is already a huge credibility gap between the specious words of the old Core Strategy and the actual implementation of that plan.For example,it was shocking to read the recorded remarks of the Portfolio Holder for Environmental Services(no less) refusing to endorse a policy of planting additional street trees “because of problems they cause to tarmac and underground cables” (minutes of DBC Council meeting 26 February 2020.)</p> <p>It is vital therefore that ,if adopted,the design principles painstakingly established in the guide are faithfully translated</p>

	into reality.Planning Officers must adhere to them strictly and consistently and,it is of the highest priority that enforcement is taken much more seriously than appears to have been the case over recent years.Otherwise this whole exercise is indeed a waste of time and taxpayers' money.
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	
If yes, please provide you comments along with any supporting information you may have.	<p>I have tried without success to comment on the portal using the user name sent to me. I therefore give my comments below.</p> <p>I welcome the opportunity to comment on the proposed Design Guide.I am not a developer or a planner but merely an interested resident and taxpayer who does wonder how much the documents have cost to compile.</p> <p>If,however, good design,respect for the environment,a reduction in global warming and an efficient infrastructure which meets the needs of the population are the long term products of the exercise then it will have been worthwhile.</p> <p>Greater attention than in the past also needs to be paid to increasing amenity capacity and developing an infrastructure commensurate with the scale of development.There is already a considerable deficit to make up in certain areas and if this means a substantially higher rate of CIL and lower profits for developers ,then so be it.</p> <p>It is facile to suppose that reducing provision for parking will result in a diminished appetite for car usage;in Berkhamsted it has merely resulted in increased parking on pavements to the dismay and distress of other residents.</p> <p>Finally,regarding flexibility and adjustability,it is already clear that the effects of Covid-19 will require more attention being given to converting existing structures(offices,shops,shopping centres)into housing units so that greenfield land of whatever status can be preserved.Therein lies a great opportunity to solve some of the most pressing problems.</p> <p>It is imperative that any proposed lightening of touch in planning procedures does not degenerate into shoddy design,poor workmanship and environmental damage, to the detriment of future generations.</p>
Include files	
ID	DSDG53
Person ID	1160454
Full Name	Mr T Putman
Organisation Details	
Person ID	
Full Name	

Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
Include files	
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If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	Yes
If yes, please provide you comments along with any supporting information you may have.	<p>General Comments on Parts 1, 2 and 3</p> <p>Content and Style of the Documents</p> <p>A. As for Content, I applaud the structure of the Design Process as set out in Part One of the Document ie Observing , Evaluating and Making a Place followed by detailed considerations under each heading all "supporting and responding to Dacorum's local character." If the Process and Principles were to be INSISTED upon, the Process would herald a new start.</p> <p>However, naming the Process a "Guide" and including the heading "Comply or Justify" at the start of Part One - allowing deviation from the requirements of the Document – both indicate immediately that the aim to create the highest quality of design can be weakened by the acceptance that there CAN be deviation from the Guide despite the threat of refusal.</p> <p>In addition, landowners and developers, even if the principles and details are not followed, can still secure permission to proceed if they can provide [unspecified] " compelling evidence" for non compliance, showing the Guide can be ignored in some circumstances.</p> <p>On Green Belt land in particular, I believe the public which has grown accustomed to the existence of Green Belt amenities, would be appalled if a planning permission was granted without the most strict adherence to the highest standards of Design as set out</p>

B. I am strengthened in my concern by the style of expression used in much of the Document. The language used strongly suggests that Dacorum will be content to waive adherence to the Document. There are many examples of a soft approach to compliance eg:

(i) On the first page "Introduction, "it is made clear that there WILL be building whatever the circumstances including on Green Belt land and there is much emphasis upon the Document being merely a Guide to land owners and developers, NOT a set of firm requirements

(ii) There is reference to a ready acceptance of compact environments and higher density communities – leaving open the idea of large housing estates cramming in as many properties as possible on a site and effectively linking otherwise distinctive parts of the dacorum area

(iii) The approach and wording of the Design and Principles may well provide for an ideal of what Dacorum would like but it also suggests readymade arguments and considerations for land owners/developers to use successfully -if they can show even SOME level of compliance

(iv) The language used is aspirational where it should be firm and directional e.g. there is too much language which "hopes for", "expects adherence to," "design expectations," encourage," "inform," "material consideration" and "strong desire" - this leaves far too much room for land owners and developers to make their case for building what they want Irrespective of the Guidance because little or nothing is framed in mandatory terms

Conclusions following Analysis of the 3 Documents

1. I have commented above mainly in relation to Part One but I do agree with ALL the ideas in Part 2 (Design Principles) and feel that, if met, they would be widely welcomed. I have no comment to make on Part 3

2. Generally, I feel there is too much leeway for departure from the vision and insufficient attention in particular to local requirements - the character of local people, existing neighbourhoods, usages of land and the wishes and needs of local people

3. The allowance of deviation runs a real risk of land being built on simply because it can be purchased by Dacorum allowing the detailed considerations to be completely waived

4. There is also a real risk that individual large developments will effectively "link" different parts of Dacorum thus losing distinctive places and features and producing a single Estate spread across a wide area - rather than creating new small and distinctive communities

5. Little emphasis is placed on the management of the building process itself and long term demands on developers to maintain what they have built. Especially in area of Green Belt Dacorum should insist on high quality in every respect plus stringent guarantees of response to subsequent maintenance issues with severe penalties for any breach

Include files

ID

DSDG54

Person ID

1250013

Full Name

Mrs Nikki Bugden

Organisation Details

Clerk
Nash Mills Parish Council

Person ID

Full Name	
Position	
Company / Organisation	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	Yes
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>Page 28 – Edges</p> <p><i>Landscape Edges offer the opportunity to enhance access to the districts’ high-quality open spaces and green infrastructure for new and existing residents in the area. They can also provide biodiversity corridors or visual landscape buffers.</i></p> <p><i>Transport Infrastructure edges are vital for the development of sustainable places but can also bring noise and air pollution.</i></p> <p>The first bullet seems to be the answer to the second one (noise and air pollution). It would be interesting to know if there is a standard ‘edge’ that would be put in place between housing and major roads (e.g. potential developments next to the M1 - Hemel Garden Communities project). Is there already a minimum amount of space /number of trees that must exist? For the purposes of health and wellbeing, should this be increased for future developments as a natural filter for co2 emissions?</p> <p>Page 64 – Movement Framework</p> <p>It is encouraging to see mentioned on this page “flexibility to accommodate future expansion beyond the site and changes in lifestyle and movement patterns” and “flexibility to accommodate electric and automated vehicles and future technology”. It should be recognised, however, that future changes in the use of vehicles (particularly autonomous) should not be a reason to overly-minimise immediate parking requirements. Supporting strategies (bottom of page 64) – it mentions a few which should be developed but does not mention a Parking strategy which would also be relevant here. There was a new draft strategy last year. Is this now adopted?</p>
Include files	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	No
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>2.1 Create Walkable Neighbourhoods with Identifiable Centres Having walkable facilities (e.g. commercial / social spaced) is very well intentioned. How can we make sure that these facilities are not removed during various iterations of development plans before building?</p> <p>3.1 Provide Housing and Facilities for Different Ages NMPC wholeheartedly supports the proposed integration of care homes and nurseries/intergenerational living.</p> <p>4 Create Safe, Overlooked Spaces NMPC supports the concept of passive surveillance to keep spaces safe.</p> <p>5.10 Reduce Car Dominance/5.11 Integrate Car Parking. Whilst it is admirable to aim for a reduction on car dominance, recent developments in the Nash Mills area are evidence that this assumption often fails in a practical sense. Even though we are in a ‘commuter belt’ the majority of our resident’s use cars at weekends and evenings. This is in part, but not entirely, due to the poor provision of train services and a lack of alternative local transport, which has a severe impact on traffic in our parish. Our</p>

proximity to the motorway network (M1/M25) also results in car ownership to facilitate use of this infrastructure. A huge issue with our most recent developments has been a severe lack in parking provision which has resulted in pushing the problem onto neighbouring streets. Undercroft parking is a good option providing the security of users and their vehicles is adequately addressed.

5.10 Reduce Car Dominance - The design aim to prioritise PEOPLE first and private vehicle users last seems incongruous as the vehicle users are still people, hence should receive equal consideration. Past local developments prove that lack of parking provision is not prioritising the wellbeing of people.

5.11 Integrate Car Parking “ensure that public realm isn’t dominated by cars parked on footway” will only be possible if sufficient parking is included. Where restrictions are put in place in one area, it simply shifts the problem as we’ve seen in Nash Mills.

6.4 Maximise Space and Daylight Whilst the document mentions a minimum size for balconies there does not seem to be a minimum internal space requirement noted.

There does not appear to be any specification to ensure that garden space in houses is commensurate with the number of inhabitants and there appears to be no consideration of this.

7.1 Create Attractive Safe and Usable Walking and Cycling Routes NMPC supports the delivery of safe cycle routes, however there is a wider implication and DBC must ensure that the network across Dacorum is safe and usable and supports this initiative, linking new developments to existing neighbourhoods as well as the town centre and industrial estate.

As part of this process NMPC would welcome consideration and discussion relating to the provision of options for a safe means for cyclists to traverse the busiest routes within Dacorum such as the A414 and the ‘link road’. These are vital routes linking from large residential areas to the main business centre at Maylands and therefore provide a hazard to cyclists due to the volume of traffic on these routes. Currently provision for safety here is lacking which may deter those willing to use alternative methods for travelling.

Adequate lighting must be installed to keep users safe, particularly during winter months as currently concerns re personal security hinder many people from walking within the parish at night. In addition, while the focus on walking / cycling is obviously well-intentioned, the natural topography of the area will make this hard for some.

7.3 Give Prominence to Health - This is such a major issue in Dacorum with its current population and therefore we would expect this topic to be prioritised and to include significantly more detail on how DBC will ensure delivery of this proposal and how our overstretched services will be futureproofed for the anticipated population increase.

7.5 Incorporate Food Production - This initiative is brilliant and would provide much needed access to ‘green space’, a desire for which has been highlighted by the recent Covid-19 crisis.

7.6 Mitigate the Effects of Pollution - the focus in this section is about reducing car dependency and the use of green infrastructure for screening. The potential to encourage an increase in electric car use is not mentioned but would also be relevant under this heading (although provision of charging options is mentioned elsewhere in the document).

8.3 Drain Places Naturally - If this is the place to bring this up, please can we comment on the unusual choice of a photograph of a child on a scooter on a very narrow bridge over a drain - possibly a safety matter?

	<p>8.6 Conserve Energy and Reduce Carbon Emissions - NMPC welcomes the initiative of “discrete on-street electric car charging points” to allow those without access to charging in their own home to still own electric cars in the future.</p> <p>8.7 Create Opportunities for Energy Production - NMPC welcomes the initiative to ensure that renewable energy is used and importantly that this energy is harnessed by adequate battery storage.</p> <p>9.3 Anticipate changes in mobility - The approach for flexible design seems sensible for the longer-term plan and not to ‘lock in’ current modes of transport, such as private cars. However, it would be interesting to know more about how this might work to avoid an initial lack of parking for current modes of transport.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	<p>No</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>Due to the current Covid 19 crisis it may be prudent for any document relating to the working environment to consider some of the implications of a pandemic situation. It could be that going forward there is a wider shift to people working from home rather than commuting so it may be a benefit to look at the long term use of these sites - would it be easy and cost effective to convert these buildings into residential buildings (as has already happened throughout Dacorum), with the infrastructure and provision requirements that entails, does this need to be a consideration?</p> <p>E.08 Smart Mobility - As mentioned above encouraging people to cycle to work will rely heavily on the wider cycle network across Dacorum being safe and accessible, simply adding the network to the new development will not enable the wider network to be sufficiently linked in a safe and secure way.</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>NMPC welcomes and supports the proposed document and would like to offer some supplementary comments</p> <p>These proposals seem to relate to large-scale developments with little consideration of smaller scale developments- do DBC envisage that the proposals will apply across ALL development, regardless of size?</p> <p>Across Dacorum there is a vast increase in population and this proposal seems to lack any mention of services and adequate provision in relation to school places, indeed, as mentioned above there is only a cursory mention of healthcare provision and this section appears to be particularly light on detail whereas the document has taken time to designate a minimum space requirement for a balcony.</p> <p>This proposal is looking at future growth and there appears to have been no consideration of the provision of anything other than the minor mention of ‘healthcare’, the lack of consideration relating to hospital services appears to fail to address the gravity of considering major growth within such a large town and the subsequent necessary provision of suitable, local services.</p>

	<p>This matter should be considered as crucial to any future proofing of a development plan (unless there is to be an additional supplementary document to address this very important matter).</p> <p>An additional note on parking (two local examples that we see in / near Nash Mills)</p> <ul style="list-style-type: none"> ▪ Apsley Lock (just outside Nash Mills) – a very attractive development, initially built with grass verges along both sides of every road. Within a short period, many grass verges were ruined by parked cars and, eventually, ruined verges were replaced with concrete to make space for parked cars. There is still a huge parking issue in this development and the number of cars forced to park on verges makes the development look much less attractive than originally intended. ▪ Nash Mills Wharf – Built with the same parking standards but the roads in the development are privately managed, therefore people living there do not see the issue of cars littered around the development. The surrounding roads bear the brunt of insufficient parking on the development. <p>Whilst there is a need to avoid streets littered with cars, creating the right parking offering in new developments (rather than not providing it and hoping people will not own cars) would be more acceptable. Lack of decent parking provision means that cars are parked around developments in a very unattractive manner. Cars parked in appropriate places (dedicated spaces, driveways, etc. are not an eye sore. It only becomes so when people are forced to use areas that should be pedestrian / green spaces.</p> <p>Mixed use of developments</p> <p>In new developments, the mix of housing, commercial facilities, social, green spaces, etc. is well intentioned. However, we have seen examples where commercial and social elements have been removed in later iterations of plans so that developments become purely housing. Will these new documents protect from this in the future (both housing and employment developments)? Will councils and Development Management Committee be able to use these documents to oppose planning that do not meet the criteria?</p>
Include files	
ID	DSDG55
Person ID	405001
Full Name	Mr Roger Hands
Organisation Details	Dacorum Heritage Trust
Person ID	
Full Name	
Position	
Company / Organisation	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>The geology statement in the Topography and Geology section is a little misleading. The whole area is underlain by chalk and it is only the drift deposits which change. In the soils section “more or less acid “ soils are mentioned. As the area is underlain entirely by chalk I think this should say more or less alkaline soils rather than more or less acid soils .</p> <p>In the observing: Topography and Geology section under 2 Site Context the box on the far right has a list of examples of what to observe. One of the bullet points in the list is “Sudden</p>

	<p>features]”, I am not at all sure what is meant by this and it needs to be clarified. In the same box changes in bedrock are mentioned, but as stated in the comment above the whole area is underlain by chalk bedrock and its only the drift deposits that change.</p> <p>In the section entitled Context: Water on the far lower right there is a statement about water and urban development. The end of the paragraph says “Other towns and villages turn their back on rivers”.... What is meant by this statement? It is not at all clear and needs to be re-worded. In the same section the paragraph in the middle of the bottom of the page about the water gardens states that Jellico created the water garden to connect the river valley and town center. What this architect did was to concrete line a natural chalk stream , I do not see any connection with the town center as this canalized section of the river is not visible from the high street, but merely forms a barrier between the multistory carpark and the high street along with the road that runs parallel to the high street .</p> <p>The Context of Ecology and Biodiversity mentions some aquatic species under the special action plan such as water voles, otter and white clawed crayfish (now extinct in Hertfordshire) but it doesn't really mention the chalk streams themselves as an important aquatic ecosystems or the fact that they are globally rare and are UK BAP priority habitats</p> <p>Under the Landscape Framework section there is a list of bullet points in the box title Consider, but wildlife is not on the list and neither are rivers. Both these need to be considered as part of the landscape. Under the supporting strategies, SuDs are mentioned along with flood prevention, but allowing more natural flood attenuation needs to be part of the strategy, this might include creation of more wetlands which would benefit biodiversity as well as holding back flood water, re-connecting the river to the floodplain in appropriate areas also benefits ecology as well as reducing the flood peak. Re-meandering straightened rivers can also help attenuate flooding as well as creating more diverse habitats. These benefits could be grouped un the term re-wilding of rivers .</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>Section 4.5 Be Naturally Connected talks about people being more connected by green and blue infrastructure, the ecology also needs connectivity and this needs to be recognized in the design. New and existing bridge crossings need to have mammal ledges for example. New built areas need to ensure that they doo not cut off natural pathways for both aquatic and terrestrial fauna. Non Native invasive species also need to be considered both in the construction phase and post cobstruction to ensure they are not spread further and that they are actively controlled.</p> <p>Section 6 Great Homes under the box headed Design should demonstrate... a bullet point should be added in relation to proper home working space as in these current times more and more people will work from home.</p> <p>Section 8.3 Drain Places Naturally should include something on permeable hard standing . SuDs are mentioned, but there is no provision for their maintenance which has long been an issue which needs to be addressed.</p>
<p>Include files</p>	

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No	
If yes, please provide you comments along with any supporting information you may have.	<p>The local chalk streams are internationally extremely important and vulnerable to too much local development creating excessive demands upon our local aquifer. Local wetlands have a crucial role in returning water to the aquifer and the historic objective to get heavy rainfall out of the district and down to the sea is thankfully not the major objective it once was.</p> <ul style="list-style-type: none"> • The design needs to address the possible impact of climate change which would include increased winter rainfall and how this would be dealt with e.g. grey water re-use, green rooves, SuDs and SuDs maintenance, natural flood attenuation. Climate change may also bring hotter daily temperature and how buildings will deal with this in a carbon neutral way • Permeable hard standing areas need to be looked at to allow rainfall to percolate through to the chalk aquifer. Permeable hard standing will also help address increased runoff and the resulting increased risk of flooding. • Increased housing will increase sewage effluent. At present, much of the effluent is gravity fed down the catchment to large sewage works . Water abstracted for local public supply use is not therefore returned to the river in the catchments its abstracted from. Consideration should be made to look at local treatment works which will return the effluent locally. • Water efficient white goods, water butts, water efficient showers and low flush toilets should be installed in all housing as standard. New buildings should also incorporate grey water use and green rooves • Gardens in new builds are getting smaller as more housing is shoehorned into available building plots. More allotments should be provided and or community gardens to allow residents to learn about plants and growing vegetables. • The removal of weirs and sluices in chalk streams would benefit the aquatic community greatly. Old historic structures should be removed or bypassed to allow the free movement of fish and to allow morphological processes to naturally occur. This re-wilding of river systems needs to be part of the built design of the borough.
Include files	
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Full Name	Tom Simmons
Organisation Details	Development Manager St William Homes LLP
Person ID	
Full Name	
Position	

<p>Company / Organisation</p>	
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.</p>	<p>Dacorum's Design Aspirations</p> <p>St William welcome that the council are seeking for growth in Dacorum Borough to “be accommodated in the Borough’s existing settlements, and some will be delivered on adjacent greenfield sites, including land formerly in the Green Belt.” However, given the emphasis the NPPF places on making use of brownfield land, it is important to recognise the important role that development on brownfield land can play in sustainable urban development. The NPPF states that “Planning Policies and decisions should: ... give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs” (Chapter 11: Making effective use of land). Whilst the Draft SPD does not set policy, St William believe that additional wording should be included to reflect the importance of brownfield development.</p> <p>Part 1: Design Process</p> <p>St William welcome the provision of a Design Process for strategic sites. However, provision of such a detailed and prescriptive Design Process may prohibit the timely delivery of sites. The Draft SPD states that “The scope of design topics and information required in Making a Place will depend on the scale and type of proposal, and should be agreed in collaboration with DBC officers” (page 10). This wording should be expanded upon and reflected throughout the remainder of the Draft SPD to ensure that the approval of applications and the delivery of homes is not prohibited or delayed by the framework. Whilst it is useful to provide a Design Process framework, St William acknowledge that development is complex and it may therefore not be possible to always follow a prescriptive framework. It should therefore be made clear in the Draft SPD that the framework may be applied flexibly to suit a context specific basis.</p> <p>Part 1: Design Process – Making a Place: Frameworks</p> <p>The suggested range of densities alongside the Spatial Typologies is overly prescriptive and could prohibit developers achieving appropriate densities in areas with good accessibility and making efficient use of land. It is therefore suggested that references to specific densities be removed to accord with the NPPF (Chapter 11: Making effective use of land).</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>Part 2: Design Principles</p> <p>St William welcome the ambition of the Draft SPD, but question whether there is sufficient clarity regarding the application of the Design Principles to smaller and medium sized sites. Many of the remaining comments in the representations provided by St William refer to the lack flexibility in the Design Principles with regard to site specific context, and the lack of differentiation between what is expected of sites of various different scales.</p> <p>Part 2: Design Principles – 1. A Distinctive Place</p>

The Draft SPD is overly focused on ensuring that development is in keeping with the character and built form of the surrounding area. Part 1 of the Draft SPD, 'Making a Place: Spatial Typologies', provides guidance on the four spatial typologies based on those identified in Observing Places. Whilst the Draft SPD recognises that "These spatial typologies are not exhaustive, design teams can identify further spatial typologies through an assessment of historic built form and landscape." (Part 1, p.73), the Draft SPD should also recognise that new development can accentuate the sense of place, streetscape and quality of the surrounding built environment and should not seek to stifle architectural ambition or high quality design.

Similarly, the Draft SPD acknowledges the diversity of the Borough's built environment but fails to promote this sense of diversity in new development, instead focusing on new development replicating existing. In this respect, the Council should ensure that Design Principle 1.3, Be Historically Inspired, Design for the Future, is expanded upon to ensure that architectural ambition can be explored, whilst simultaneously respecting the district's character.

Design Principle 1, A Distinctive Place, fails to fully consider circumstances where the existing built environment is of a poor quality. As such it is suggested that Design Principle 1.1, Build a Narrative of Place to Inform Designs, reads "Design Aim: To employ the Design Process set out in this guidance (Part 1) to build a place narrative as a starting point for exemplar design which responds to the local context, provided that it is of a high existing quality".

Part 2: Design Principles – 2. A Compact Place

The Draft SPD Part 1: Design Process, Making a Place: Frameworks, Land Use Framework, states that "All new developments should have a defined centre with a mix of land uses, such as schools, local shops, community space or play areas." This guidance is clearly only applicable to developments of a certain size such as the urban extensions expected in Dacorum. Design Principle 2.2, A Rich Mix of Uses, expands upon the Land Use Framework and suggests that Designs should demonstrate "A mix of complementary uses that provide for the social, economic and leisure needs." Design Principle 2.2 should clarify that a mix of land uses may not always be possible or appropriate; reference should be made to the Site Allocation. It is not for a SPD to set policy.

Part 2: Design Principles – 3. A Place for All

St William support integrated and inclusive neighbourhoods and therefore support the objective behind Design Principle 3.1, Provide Housing and Facilities for Different Ages. However, it may not always be possible to provide "Intergenerational living opportunities" within a specific development site. It should be clarified that this Design Principle should be applied at a neighbourhood level, rather than a site specific level. Again, we would encourage reference to the Local Plan and Site Allocations where this would be more suitably placed. St William support and encourage the aim of Design Principle 3.2, Integrate Different Housing Tenures, to achieve integrated and inclusive neighbourhoods. All St William developments are designed to be tenure blind and the affordable homes are designed with consideration of both the future community/resident in mind and are aligned with Housing Associations needs and objectives, which often includes consideration of end service charges. On this basis, there will be circumstances where a separate entrance would be suitable to avoid an excessive service charge being placed on affordable housing units.

St William agree with Design Principle 3.4, Integrate Play, that it is important to integrate play throughout new places. However, the Design Principle should recognise that it may not be possible

or appropriate to provide “Exciting multi-sensory play spaces for children and young people of all ages” across all developments. It is important to consider that it may be more appropriate to deliver other forms of social infrastructure at a new development, depending on the site-specific context. This principle should be amended to allow for further flexibility.

Part 2: Design Principles – 4. A Connected Place

The integration of economic activity within residential areas is an important step towards creating vibrant places and whilst St William generally support the intention behind Design Principle 4.2, Be Economically Connected, the Draft SPD should recognise that it would not be appropriate to provide retail and office uses on all sites, especially where there is a more pressing need for the delivery of new homes.. The location of specific uses should form part of an Authorities spatial strategy as set out in policy of a Local Plan, it is not appropriate to include within an SPD and should be deleted. St William is a landscape-led developer and deliver a net biodiversity gain across all of our sites. St William support the objective of Design Principle 4.5.1 to provide “Safe, direct and attractive walking and cycling routes to nearby open spaces”. It should, however, be recognised that it may not always be possible to comply with this Design Principle given site location and surrounding uses and on this basis the SPD should be altered to allow for some flexibility. It is considered that Design Principle 4.5.2 should clarify that blue infrastructure is not required on every site, but rather at neighbourhood level. Provision of blue infrastructure across every site would be excessively onerous and could prohibit other strategic priorities, such as the delivery of new homes, where limited space is available for development.

Part 2: Design Principles – 7. Active and Healthy

It is important to offer easy access to sporting facilities, and St William encourage Design Principle 7.4, Enhance access to sport. However, St William consider that provision of indoor and outdoor sports facilities should be commensurate with the size of the development and consider the viability of providing such facilities.. Again, this is something that should be dealt with at policy stage and should be deleted. It is considered that Design Principle 7.5.2, Incorporate Food Production, to ensure that designs should demonstrate “Public realm spaces that incorporate opportunities for food production or orchards.” is overly prescriptive. Although use of the public realm for growing spaces is supported, this should only occur where appropriate and where there is an evidenced demand.

Include files

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

- * Yes
- * No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

Include files

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?

- * Yes
- * No

If yes, please provide you comments along with any supporting information you may have.

St William Homes LLP ('St William') is pleased to provide representations to the Draft Dacorum Strategic Design Guide SPD (from herein referred to as 'the Draft SPD').

Established in 2014, St William is a joint venture between the Berkeley Group and National Grid Property ('National Grid'). The partnership combines National Grid's extensive portfolio of surplus brownfield sites across London and the South East with the Berkeley Group's design expertise and proven track record of delivery to create high-quality residential and mixed use developments.

St William pride ourselves in transforming derelict former gas work sites; creating beautiful and vibrant places where new inclusive communities can thrive and also integrate with the neighbourhoods that are already there. The pandemic has highlighted the importance to create high quality homes along with well designed public realm and places that are inclusive, accessible to local amenities and green space. We are continuing our commitment of delivering a net biodiversity gain on all our schemes.

Our written representations to the Draft SPD consultation are set out below. It should be noted that these representations are made solely on behalf of St William, notwithstanding any representations made by other divisions of the Berkeley Group or National Grid.

General Approach

St William welcome Dacorum Borough Council's approach to preparing the Strategic Design Guide SPD. The adopted Core Strategy (2013) committed to preparing an Urban Design SPD to deliver the Council's design aspirations. The Dacorum Strategic Design Guide forms the first part of this guidance.

Notwithstanding this, given the recent publication of the Planning White Paper, its proposed third pillar 'Planning for Beautiful and Sustainable Places as well as the Paper's references to the National Design Guide and BBBB Commission report, it will be expected that the SPD is updated accordingly prior to publication. St William support the general direction and intention of the Draft SPD. Some detailed comments on specific sections of the document are however set out herein.

Whilst Part 1 – Design Process; Part 2 – Design Principles; and, Part 3 – Employment Uses Guidance provide useful context it is considered that they are too long and could be condensed. In particular, an excessive amount of space throughout the Draft SPD is dedicated to examples and context. Removal or condensation of examples and context may aid in reducing the length of longer sections of the Draft SPD, such as Part 1, Design Process, Observing Place. Provision of the Draft SPD in three distinct, and separately downloadable, documents inhibits the user-friendliness of the SPD.

Summary

St William welcome the opportunity to comment on the Dacorum Strategic Design Guide SPD and supports its aims and ambitions; however, the Draft SPD could be heavily condensed and made into a more user friendly format. The Design Process should be modified to allow for a less prescriptive, more flexible approach. St William trust that their comments will be duly considered and welcome further discussion with the Council.

Include files

ID

DSDG57

Person ID

211588

Full Name

Mr Tim Amsden

Organisation Details

Person ID

Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>On the contents of the Process paper, I would observe that under Context: Water, the canal environment at the Tring summit, with its two branch canals, reservoirs, cutting, pumping station, dry dock and former lock-making workshop are considerably more significant historic features than anything Nash Mills has to offer. Under Ecology, I would point out that Tring Park, High Scrubs etc woodland contains comparatively little beech, and is predominantly mixed deciduous woodland. Ash is more significant and is referenced in local place names.</p> <p>Under Vernacular details and materials, I venture to suggest that puddingstone presents itself in such vanishingly small quantities that it is not worth the mention. There appears to be no mention of straightforward brick and flint, which is a frequently encountered combination, but only of flint and stone chequerwork, which is something usually encountered in only church architecture and would be unduly expensive to recommend to developers. Local brick covers a wider colour range than just orange/red, extending to brown and purple according to its position in the kiln. In general the orange shade is not to be encouraged as it is more susceptible to frost, and looks terrible bonded in modern khaki-coloured mortars. The idea that there is some kind of relationship between local masonry and straw plait is very far-fetched indeed.</p> <p>While I'm impressed with the attempt to define locally prevailing spatial typologies, I fear they will be wholly misunderstood and misapplied by developers and there is a danger of pick and mix. I am mystified by the photograph of Aldbury in a context of waterside settings - that's a pond. I was disappointed that the guidance failed to emphasise the special character of 19th/20th century Estate housing, which is a prominent feature of Tring and surrounding villages, and also of Aldbury and Ashridge. No-one would wish to see feeble imitations of Rothschild or Brownlow buildings, but there is much to be learned and referenced from them.</p> <p>In this context, and in relation to the idea of 'tenure-blind design', I would mention the 56 houses in Tring (Miswell Lane and elsewhere) which Lord Rothschild built between 1909 and 1913 and handed over to Tring Urban District Council. While they are deliberately differentiated from his own Estate houses, they accord very well with them and with neighbouring properties and do not stand out as obvious social housing.</p>
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	<p>Under 8.7 in the second document I note the reference to solar panels. I cannot understand why you would not insist upon their being fixed to all new houses, as it is vastly cheaper and simpler to install on a new building than to retro-fit.</p>
Include files	

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

* Yes

* No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

Include files

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?

* Yes

* No

If yes, please provide you comments along with any supporting information you may have.

Yes

Despite four attempts at logging in, including asking for a new password, the system will not admit me to the consultation. Please accept the following comments instead.

I should point out that for forty years I was engaged in conservation-based building work locally, mainly roofing and flintwork, at a practical level. I participated in the writing of the Chilterns Conservation Board's various design guides. For twenty years I was a town councillor and took a very close interest in planning and design matters, including the Tring High Street Improvement Scheme of 1987. I am also involved in the running of Tring Local History Museum, contributed to the research for the latest Pevsner guide, and am preparing a biography of William Huckvale, the Tring architect.

Q4

In broad terms, the proposed guidance represents a major step forward for local planning and is very welcome. Something of the kind should have been introduced many, many years ago and would have spared us acres of bland, orthodox and uninteresting buildings out of keeping with and detrimental to the local landscape, towns and villages. If adopted, it should spare us from the sort of architecturally illiterate, computer-generated estates which are springing up around towns such as Aylesbury and Bicester.

If Dacorum has declared a 'climate emergency' it might be best to call a moratorium on further building, which will result in additional CO2 emissions from construction and the road traffic engendered. Building on the scale indicated by the most recent district plan proposals will only exacerbate the present conditions and result in irreversible change to the character of Dacorum. This guidance will at best merely limit the damage.

Under Connectivity, the new guidance needs to do better than has occurred with the redevelopment of the St Francis Convent site in Tring, where an obvious footpath connection might have been made to Longfield Road, allowing access to primary schools, recreation ground and shops, and yet was not insisted upon. Furthermore the road access from Aylesbury Road, although unfinished to date, does not appear even to have a footway alongside it. This will result in unnecessary car use. The two areas for major housing development in Tring proposed in the most recent draft district plan, Dunsley Farm and Marshcroft, offer contrasting cases when it comes to connectivity with the town centre. Dunsley Farm (which in my view should remain, erm, a farm) is at least in close proximity to the town centre. The Marshcroft area is at a considerable distance from it, and it is hard to see how development there could ever satisfy these criteria.

The stress on the railway system and its access to London is looking a bit dated in view of recent events. In any case it strikes me as undesirable to posit Dacorum in terms of a commuter

	<p>wonderland. Elsewhere, the concept of flexible work patterns is stressed, and I would argue that this will be more than ever necessary for the post-Covid world.</p> <p>It is not made clear how any of these documents might relate to, and be compatible with, the current Government proposals for the planning system, which are aimed (in my view, wrongly) at simplifying the system. Would not these proposals be seen as further complicating it? Are they compatible with the new concept of Local Development Orders?</p>
Include files	
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Person ID	1207604
Full Name	Thames Water Planning Policy
Organisation Details	C/O Savills Thames Water Planning Policy
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?	
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	
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* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.	
Include files	
Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?	
* Yes	
* No	
If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.	
Include files	
Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?	Yes
* Yes	
* No	
If yes, please provide you comments along with any supporting information you may have.	Thank you for consulting Thames Water on the Draft Strategic Design Guide SPD for Dacorum. Thames Water is the statutory sewerage undertaker for the borough. General Comments

	<p>Thames Water support the inclusion of requirements for SuDS and water efficiency measures in new development. The inclusion of SuDS can help to ensure that development does not overload existing sewerage networks and surface water sewers and can help reduce the requirement for sewerage network upgrades.</p> <p>New development proposals may have an impact on off-site sewerage infrastructure requiring upgrades to the network. These would be provided by Thames Water and funded through the infrastructure charge for new development, however, the timescales for delivery can vary. Local network upgrades can take around 18 months to design and construct while strategic upgrades could take 3-5 years.</p> <p>Thames Water support section 2.2.2 which requires designs to demonstrate 'Adequate provision of land for business and infrastructure including transport, utilities, community and green infrastructure, which as a minimum achieves/complies with the required space standards for each type of infrastructure.'</p> <p>To assist with this requirement in relation to wastewater infrastructure, the design guide could incorporate supporting text encouraging developers to contact Thames Water to discuss the drainage requirements for their development ahead of the submission of any applications.</p> <p>I trust the above and enclosed comments are satisfactory, but please do not hesitate to contact me if you have any queries.</p>
Include files	
ID	DSDG59
Person ID	868541
Full Name	Mr Michael Curry
Organisation Details	Town Clerk Tring Town Council
Person ID	
Full Name	
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<ul style="list-style-type: none"> • Page 17 "Site Context Examples of What to Observe" at "grasslands" add "especially species rich grassland". This Natural England information could be added as a reference (Whilst identifying whether grassland is alkaline or neutral is necessary, it isn't sufficient.): http://www.magnificatmeadows.org.uk/assets/pdf/How_to_identify_diferent_types_of_grassland.pdf • Page 26 "Public Transport" photo and words. 2nd sentence re connectivity to railheads at least needs "highly" before "desirable" and "is essential" is preferred • The inclusion at Page 27 in Supplementary Information of "walking time studies" is pleasing as that's crucial to understanding the feasibility (or otherwise) of minimising car dependency. • The "Observing Places Examples" (pages 44 – 47) should be very helpful to developers from out of area
Include files	
Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the	

10 broad categories) will be effective in securing high quality development?

- * Yes
- * No

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

- Part 2 isn't sufficiently strong on renewable energy (unlike Part 3 on employment). That insufficient strength seems partly to be an unintended consequence of the very strong emphasis on design layout of housing needing to reflect the traditional layout specific to the type of place. That means that the layouts shown in the section on Spatial Typologies often militate against effective renewable energy via solar PV and solar thermal on about half the houses (houses need to be aligned roughly east-west so as to receive on suitable roof facing between SW and SSE), and in some cases may well mitigate against Passivhaus standard, where spacing between adjacent rows is very important
- Emphasis on mixed types of affordable homes on a development, and having them mixed in with the rest of the housing is a positive feature
- A commitment that in design within and around developments the car is subservient to pedestrians and cyclists e.g. Dutch roundabouts
- Roads & Parking
 - o Para 5.2.5 "For all street types, carriageways with the minimum width possible...." Need to consider omitting "all", because what about bus access, waste/recycling truck access, emergency vehicle access
 - o Para 5.11.5 exacerbates the above by providing for cars parking on the pavement. That is illegal (although common) and would be problematic for parents/carers with buggies/toddlers, and for elderly people especially those with disabilities
 - o Para 5.2.5 is also incompatible with para 5.11.2 and the use of on-street parking, unless on-street parking is allowed only in bays
 - o Para 5.11.4. Car park surfaces should also be to SUDs standard
 - o Charging facilities should be provided to encourage adoption of electric local delivery vehicles and buses
- Orientation. Para 8.7.1 What's discussed here is expressed more clearly in Part 3 para E.05.1. Orientation of houses to achieve what's proposed here needs stating, plus specific distances from other buildings to avoid roof shadowing (which significantly reduces the performance of roof mounted solar PV)
- Adaptation. This should surely apply both ways e.g. houses to make them easily adaptable for staying in as occupants become disabled/unsteady on feet/difficulty with stairs

Include files

Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?

- * Yes
- * No

If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.

- E.06.3 Add "repair shops"
- E.07.2 Add "public transport links to nearest mainline rail station"
- E.08.1 EV parking bays should be at all employment units (not just in "key areas" which is a very vague, imprecise phrase)

Include files

Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?

- * Yes

<p>* No</p> <p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>1. Summary</p> <p>The Town Council welcomed the approach adopted and the implicit recognition of the importance good design in its widest context can play in Part 1. The principles articulated in Part 2 are obvious, fundamental objectives if a sustainable, connected and healthy community is to be achieved. The SPD is going to be a key document given the direction the Government appears to be going form the recent White Paper ‘Planning for the Future’. That Part 3 reflects the aims and ambitions of the Parts 1 & 2 is important because of the significance proportion of time dedicated to one’s work. It is an integral part of achieving the community objectives.</p> <p>The major criticism is that whilst taking a more holistic approach to community development, the draft Design Guide has not gone far enough in its considerations of how modern trends are blurring the distinction between residence, leisure and work. COVID19 was accelerated these trends – home working, the decline of retail and the need for town (& village) centres to play a different role as articulated in the Grimsey Reports 1& 2.</p> <p>The typological examples give the evolutionary perspective on how communities have developed. But given the lifestyle trends and the scale of development being faced now, which is radical not evolutionary, growth cannot be accommodated simply by more of the same.</p> <p>Looking at the changes that are taking place now, there are parallels to the Industrial Revolution and whether-or-not the outcome is rows of back-to-backs next to the pit or mill, which at the time represented an improvement over rural housing albeit relatively short-lived, or the more philanthropic approach behind Port Sunlight/Bourneville where investment was made in the community, which has stood the test of time.</p> <p>Building methods, standards and infrastructure are an integral part of achieving good design and cannot be considered in isolation. Therefore they must be specified in a meaningful way that tackles energy efficiency and sustainability and not abandoned in the quest for speed and simplicity by sticking to minimum standards.</p> <p>Technology exists now to radically move the building industry away from traditional bricks and mortar often in ways that deliver higher standards more quickly facilitating the oft quoted ‘building beauty’ in the White Paper (It is appreciated that the draft was prepared prior to the publication of the White Paper).</p> <p>There is a role for the SPD to play in encouraging the use of local materials.</p>
<p>Include files</p>	
<p>ID</p>	<p>DSDG60</p>
<p>Person ID</p>	<p>742209</p>
<p>Full Name</p>	<p>Mr. Steve Melligan</p>
<p>Organisation Details</p>	<p>The Crown Estate</p>
<p>Person ID</p>	<p>1251771</p>
<p>Full Name</p>	<p>Andrew Watson</p>
<p>Position</p>	
<p>Company / Organisation</p>	<p>Savills</p>
<p>Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?</p> <p>* Yes</p> <p>* No</p>	

If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.

The document sets out a design process for new developments to follow in order to achieve the Council's design expectations.

Page 8 (How to use this guide) contains a diagram that provide a broad overview of the planning process for strategic sites. This differs from the same diagram that was displayed on page 8 of the SADC Strategic Site Design Principles document and could result in conflicts with the cross boundary applications. It is also noted that the DBC diagram consider that pre-application discussions would not be involved in the creation of Frameworks or for Reserved Matters applications. From our experience ongoing discussions via Planning Performance Agreement are required for larger and complex sites. These discussions will need to include that of Design Frameworks and details attached to Reserved Matters applications. Furthermore, it suggests streets and spaces are a Reserved Matters issue. TCE's experience of the East Hemel masterplanning process is that this is something for earlier consideration. The guidance should be clearer on this, and a consistent approach would be welcomed.

Page 42 (Spatial typologies) refers to 'hoe typology' with development parallel to the topography and roads/pavements perpendicular with the contours. It is likely that these roads/pavements will exceed Hertfordshire County Council (HCC) slope angles and will be non-compliant with highways standards.

As was noted to SADC regarding the Strategic Spatial Masterplan, it is not clear whether developers will accept non ambulant disabled streets and pavements due to the steepness of some parts of the site. This is a potential conflict between historic replication of character areas and the physical limitations of the site. Each of the five sketches on pages 42-43 represent houses as long thin narrow wide frontages – this will not deliver a density of 40dph as the density of properties cannot be delivered through wide frontage property.

Include files

Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?

* Yes

* No

If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.

The second part of the DSDG details the design principles which will set a high standard for new development in order to achieve sustainable growth and retain the design of Dacorum's places. The following observations have been made:

Page 12 para 4.2.3 this goes beyond the remit of what would be expected as part of a planning application. It should be removed, or the intent clarified.

Page 21 item 6.3.2 suggests adequate threshold space for dwellings. If this is applied rigidly then Mews streets and frontages that directly address the pavements will not be supported. Notably, properties with direct access to the street is a characteristic of some of Dacorum's Conservation Areas.

Page 22 Item 6.6.3 (numbering should be 6.7.1) please note that some statutory authorities require access and therefore internal utility boxes may be resisted, although this could potentially be overcome by smart metering.

Page 24 item 7.4.4 this paragraphs suggests that parks should meet Green Flag standards but does not provide a quality threshold. Clarity would be welcomed on this point.

Page 26 item 8.1.1 The requirement for BREEAM Excellent for buildings over 1,000 sq m is onerous and should be set at Very Good, with an aspiration for Excellent.

	<p>Page 29 item 8.7.2 requests that large developments incorporate sustainable district heating and power networks. As per our Energy Strategy PPA meeting (Land at East Hemel), district energy networks are only effective at the scale and density of East Hemel and NWHH if: there is a source of waste heat to be exploited centrally and distributed; and there is a mix of uses with simultaneous heating/cooling demands that facilitate energy sharing in denser locations (e.g. district centres). The requirement for mandated district heating and power networks may not be appropriate and its feasibility should be investigated.</p> <p>Page 33 item 10.5.1 clarification of the intent – planning stage should read ‘reserved matters stage’</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	<p>The third part of the DSDG provides guidance on the design of employment developments.</p> <p>TCE would like to make the following comments:</p> <p>Page 4 the diagram is unclear as to what applicants should achieve.</p> <p>Page 6 item E.02.4 sports provision is not embedded in the LEHH employment zone because of physical constraints (e.g. HSE DPZ zone) as concentration of people is prohibited. We would expect DBC to acknowledge this and take a flexible approach.</p> <p>Page 10 E.03.1 (References to Green roofs): TCE do not support the use of green roofs on commercial buildings where their use would compromise viability. The guidance should be outcomes focussed, delivering maximum ecological and social value as opposed to prescribing specific initiatives.</p> <p>Page 14 item E.05.4 the requirement for BREEAM Excellent for buildings over 1,000 sq m is onerous and should be set at Very Good, with an aspiration for Excellent.</p> <p>Page 24 diagrams are not representative of modern industrial units, with limited servicing and reference to undercroft parking. TCE would suggest this is misleading and should contain more reference to building types similar to that of nearby Prologis Park, Hemel.</p> <p>Page 25 (Diagram 1) a strategic approach to servicing contains prescriptive dimensions that are wrong, suggesting that service yards would operate on a 27m depth and are enclosed. This is incorrect.</p> <p>Page 25, Reference to social hubs is potentially misleading: Buildings are required to function to the end user operations and so the guidance should not be limiting how each unit can be set out.</p> <p>Page 26 (Industrial Units): best practice examples. Examples used are overly bespoke, and not representational of best practice within large industrial units.</p> <p>Page 27 (Parking and Servicing) Parking on roofs is not considered good practice. Whilst it is possible, it should not be within the design toolkit, and is more aligned to an urban location where space is tight.</p>
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	

If yes, please provide you comments along with any supporting information you may have.

Land East of Hemel (LEHH) – Bespoke Situation
 Whilst the opening context of Part 1 explains that a joined-up approach to HGC with SADC and Herts IQ has been taken, it is not evident throughout the guidance. Paragraph 4.1.7 of the draft SADC Strategic Spatial Masterplanning Toolkit (SSMT) explains that a the north and east of Hemel Hempstead broad locations will be subject to a bespoke process and will be developed with DBC and other stakeholders. It is note that the bespoke approach to LEHH in not included in the DSDG and TCE consider that it should be included to provide consistency across the development.

Justify or Comply

TCE welcomes the flexibility provided by the pragmatic approach of justify or comply:

‘The Strategic Design Guide is to be used following a principle of ‘Comply or Justify’. Deviation from the principles and design processes set out will only be permitted with robust and evidence-based justification for doing so. In such cases, developers and their design teams must demonstrate that their proposals will deliver the very highest quality design that aligns with the aims of each Design Principle theme.’ (page 7, draft Part 1).

It is important to recognise that design is subjective, and there may be many different responses to a site. It is encouraging that both DBC and SADC have recognised this within their draft design guidance as it will allow the Local Authorities to deal with deviations from their design guidance documents pragmatically. However, it is important that the guidance contained within the documents is realistic and at the moment there are concerns that the guidance, as drafted, introduces unrealistic and undeliverable requirements.

Include files

ID

DSDG61

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Full Name

Mr Tim Noden

Organisation Details

Planning Manager
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Mrs Sam Ryan

Position

Director

Company / Organisation

Turley Estates

Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context?

No

* Yes

* No

If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.

The Guide presents sound advice in terms of how to approach a site and gain an understanding of its context and attributes, to show how these should inform a robust design concept. The process section presents some spatial typologies based on historic settlements in the district that are used to explain how contemporary developments can reflect local distinctiveness through replicating patterns in urban form. However, it appears to place over-emphasis on historic and small scale samples for reference; those typologies would not be easily replicated in larger developments in a way that would not necessarily meet the demands or requirements of modern lifestyles. In particular, the analysis gives the overall impression that all twentieth century housing in the district has failed to create good places and as a consequence, it can be disregarded in terms of a reference for

future places. Yet, there are numerous places in Dacorum including tree-lined streets and compact walkable suburbs, that remain very popular places to live. It is recommended that the Guide identify the most successful and sustainable examples of twentieth century popular places to live and also include those as references for future developments.

Page 5 Dacorum's Design Aspirations - We support the strategic design aspirations and the proposed “strategic approach to design at all scales, embracing nationally-recognised best practice whilst responding to the characteristics and features which are unique and distinctive to Dacorum”.

Page 6 - The Strategic Design Guide was prepared through collaboration with St Albans City and District Council (SADC) and Herts IQ, in recognition that the features which make the local area distinctive are not contained by administrative boundaries - It is unclear whether other stakeholders, including the local community, were involved in development of this Design Guide. It is important to capture the views, aspirations and architectural tastes of local people since they will be living in the new developments and communities created. The NPPF states that effective engagement with communities is essential in achieving well-designed places; in those circumstances it would be appropriate and in accordance with policy to ensure that the design approach and imagery presented in the draft Design Guide is informed by consultation or collaboration with the local community; for example through workshops with residents or community groups, and a poll of architectural styles, ensuring the views, desires and aspirations for new places reflect community preferences. Alternatively, there should be flexibility within the SPD to allow for departures to be justified where this reflects community feedback following site specific local consultation.

We note that all of the imagery presented in the Design Guide is of contemporary design. Whilst this may appeal to some people, it is clear that many people still have a preference for traditional styles when it comes to choosing a home. This is demonstrated in the Policy Exchange survey of 5,000 people in 2018

(<https://policyexchange.uk/wp-content/uploads/2018/09/Building-More-Building-Beautiful-for-print.pdf>) For ‘suburban settings’ (page 44) the 1930s homes was voted the one with the right look and feel by participants. 1930s inspired architecture also emerged as the most ‘acceptable’ style of home in a survey of 1,100 councillors in the book “Building in Arcadia” (2019).

In Redrow’s representations to the Building Beautiful Commission, the company noted how its customers have a preference for Arts and Crafts style homes suggesting that any definition of beauty should reflect the tastes of home owners; this was agreed by the Commission. Please see pages 114-115 of the Living with Beauty report -

<https://livingwithbeauty.com/press-and-media/press-releases/press-release-04-08-2019-what-ebbc-reveals>

Pages 7-9 - A three-stage design process based on observing, evaluating and making a place - this three stage design process is supported

Page 10-31 - Observing place in respect of topography, geology, water, green infrastructure and landscape, ecology and biodiversity, historical legacy, visual exposure, enclosure and shelter and connectivity, edges and boundaries and land use. - The approaches set out under these headings are supported and will help to create responsive, successful places.

Pages 32 - Context: Urban Grain and Built Form “The variety in morphology and grain characteristic of old settlements is often missing in new developments, which tend to be comparatively monotonous in appearance as a result” - We are concerned that the Guide’s sweeping critique of modern developments and

apparent reliance on historical building patterns is unhelpful. As a starting point, the guidance for new homes and communities should reflect how people live today – the modern functional requirements of new homes and places – as well as the desires, aspirations and tastes of the people who will live there. Such approach will deliver sustainable places where people will be happy.

There are a number of images of modern developments with more traditional architectural styles within the “Building for a Healthy Life” Design Toolkit which are shown to be good “green” examples

(https://www.dacorum.gov.uk/sites/default/files/attachments/14%20JULY%2020%20BFL%202020%20Bookie_3.pdf)

While fine grained and high density development may be appropriate in town centres and inner urban areas, this should not be a ‘catch-all’ model for the delivery of attractive, functional and practical places to live.

The Guide would benefit from revisions to include reference to the wide variety of popular, attractive residential places to live across Dacorum.

For example, local Estate Agents in Tring have consistently reported that the most popular streets to live in the town are grove park road, tring hill, and station road. The Design Guide should be revised to include reference to these and other very popular twentieth century streets in the borough, in recognition of the many qualities that residents value, including a green setting, detached homes, practical and functional on-plot parking, and attractive traditionally-inspired architecture. Houses with a sense of homeliness and cosiness arranged along a recognisable, attractive, tree-lined street. Such values should also be recognised as an important driver for delivering popular, successful places to live. Their absence from the Guide is a notable omission. It is possible to design compact, sustainable new places comprising very sustainable homes, designed to reflect peoples’ preference for traditional architecture and arranged along recognisable and desirable tree-lined streets. As drafted, the Guide appears to preclude this type of approach and does not reflect the preferences of many of the borough’s residents.

Pages 36 and 37 - This section sets out what to look for in appraising the local architectural vernacular - The use of local material palettes and distinctive architectural detailing may be particularly important considerations where development is proposed close to an area of identified local distinctiveness (such as a Conservation Area or Listed Building). However, this is not necessarily an appropriate approach for all development sites. In most locations new development should be informed by its immediate surroundings enabling it be well integrated into the local area. The National Design Guide states that well-designed new development should be based on an understanding of “the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development.”

(https://www.gov.uk/government/uploads/attachment_data/file/59348/National_Design_Guide.pdf)

The draft Design Guide should be revised to explain that the architecture prevalent in an area is an acceptable reference for new developments..

Pages 38-43 - “Identifying patterns” and “Spatial typologies” These pages set out “some spatial typologies observed in settlements in Dacorum and St Albans.” 5 Spatial Typologies are presented all of which are based on historic small scale sample clusters of buildings, such as: around a green; a farmstead courtyard; a group of longhouses; a high density market street; longhouses along contours - The typologies presented present a useful reference for housing developments of c. 10-20 dwellings. While elements of those typologies could

be included within larger developments, they are not appropriate for creating the framework necessary for larger scale housing schemes where additional elements such as recognisable streets, hierarchy of routes and spaces, and defined perimeter blocks are necessary to deliver a legible place.

The diagram on page 38 showing how historic settlement forms may be useful as part of the narrative to inform layout of new residential areas. It would benefit from further elaboration and reference to successful, well-designed and popular residential areas that include a range of densities and a clear hierarchy of streets.

Pages 48-53 - Evaluating Place - This section offers very clear and helpful guidance on how to identify the strengths and opportunities of a site and filter these into a responsive design concept.

Page 66 - This section explains that “Neighbourhoods should be clearly defined by the framework elements, with the potential for clusters of different typologies within the neighbourhoods” - This section would benefit from including an explanation of street types and how these are important in creating a successful place. Streets are an important element in delivering a successful and well-design place and whilst principles for streets are included in Part 2 of the Guide, Part 1 makes no reference to the design of a clear and legible street hierarchy. It is not possible to create a sustainable, legible and well-ordered development (especially on larger sites) by applying clusters of different typologies without a clear street network to apply them to.

Page 70 - Making a Place: Spatial Typologies - Although it is explained that “These spatial typologies are not exhaustive, design teams can identify further spatial typologies through an assessment of historic built form and landscape”, those presented fail to recognise the importance of creating recognisable streets. Beyond a small housing development of 10-20 dwellings it is difficult to understand or interpret how these typologies are to be applied. The diagram on page 70 misses out what is probably the most important organising element in any successful place – the street network. This should be added between neighbourhoods and spatial typologies. Spatial typologies should also be expanded to include reference to successful examples of housing development from Dacorum the last 50 years including tree-lined streets comprising high quality, desirable homes.

Pages 72-78 - Contemporary spatial typologies Four ‘Contemporary Spatial Typologies’ are presented Rather than the usual way of presenting design guidance through street typologies and character areas, Part 1 of the Design Guide presents a series of typologies featuring worked up areas of development. While this is useful at a macro scale, it makes interpretation of the guidance for larger sites (> 50 dwellings) difficult to follow.

Detailed comments on each of the typologies are set out below:

The Green and The Ham / Worth:

This typology is based on ‘structured courtyard typologies, like farmsteads or almshouses, forming architectural ‘set pieces’ within the landscape.

It is difficult to interpret how these principles are to be applied to a development unless the intention is to replicate the illustrative layout shown.

The example includes a number of elements that would not be helpful in creating a legible, permeable and popular place to live:
- East-west permeability for pedestrians and cyclists is compromised (a street-based system would be better)

- The layout would not be easy to understand and legibility is compromised without a clear hierarchy of street types / spaces and movement routes

- Rear parking courtyards are inconvenient for residents and are likely to lead to uncontrolled parking to the front. All of the example images feature contemporary designed homes which may not necessarily reflect the local vernacular or be preferred by the local community.

This selection of images should be revised to include examples of homes of a traditional design and appearance which research has shown continue to be very popular with the borough's residents.

A number of possible images are offered below (see table attachment to response). The high resolution versions can be issued to the Council if it wishes to include these.

The hoe:

The use of only terraced housing is likely to lead to parking-dominated streets. The illustration could be improved by adding a greater variety of house types including terraced homes with parking to the side which is convenient for residents and minimises the impact of cars within the street scene.

- The north south routes prevent movement by cyclists, wheelchair users and cars and are poorly defined as not enclosed by built form. Amendments would be useful to show how north-south permeability for all vehicles can be delivered, with well-defined and overlooked streets and spaces.

All of the example images feature contemporary designed homes which may not necessarily reflect the local vernacular or be preferred by the local community.

This selection of images should be revised to include examples of homes of a traditional design and appearance which research has shown continue to be very popular.

Possible additional images are offered below and in earlier comments above. The high resolution versions can be issued to the Council if it wishes to include these.

The Stead/Sted:

This illustration presents a potentially confusing arrangement of buildings and spaces that could be difficult to understand and move through. A traditional street-based network (rather than development blocks within space) would be easier to understand, easier to service and access and more efficient. All of the example images feature contemporary designed homes which may not necessarily reflect the local vernacular or be preferred by the local community.

This selection of images should be revised to include examples of homes of a traditional design and appearance which research has shown continue to be very popular.

Images such as the below are offered for inclusion in the report, as well as those referenced in previous comments.

The Bourne/End

The rear elevations of the homes facing the green define the edge of the street to the north. This presents challenges in terms of a satisfactory overlooking of the street and creating a secure boundary. We would question the position of the street in this example and suggest that it relocated to the front of those dwellings facing the green using shared materials / private driveways with off-road parking for all vehicles to soften the effect.

All of the example images feature contemporary designed homes which may not necessarily reflect the local vernacular or be preferred by the local community.

	<p>This selection of images should be revised to include examples of homes of a traditional design and appearance which research has shown continue to be very popular. Images such as the below are offered for inclusion in the report, as well as those referenced in previous comments.</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes * No</p>	<p>Yes</p>
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>Part 2 of the Guide sets out clear, very helpful design principles to guide development and ensure that sustainable places with a sense of community will be delivered. Many of the design principles reflect our own commitments to delivering great places that are well-connected and easy to get around, include destinations within walking distance, careful integration of people and nature, and delivery of streets for living.</p> <p>Some detailed comments are set out in the accompanying table.</p> <p>The attached comments form includes some suggested images for contemporary designs by way of example. We would be pleased to provide higher resolution versions of those images if they would be useful for inclusion in the final version of the Guide.</p> <p>Page 6 - 1. A Distinctive Place It is stated in the Overview that “Putting lessons from the local context into practice should be achieved through good modern design and innovation not in a tokenistic or cynical way, or through pastiche.” - Whilst innovative and modern designs should be encouraged it should also be recognised that homes with a traditional design and appearance (such as Arts and Crafts inspired homes) continue to be very popular with many people. These homes can be designed for modern lifestyles while meeting modern sustainability and efficiency standards. The text should be amended to: “Putting lessons from the local context into practice should be achieved through reflecting the character of existing buildings in the immediate locality (as suggested in the National Design Guide). Good modern design and innovation should be encouraged where appropriate.</p> <p>Page 15 - 5. Great Streets and Public Spaces Sets out principles for creating legible and navigable places using a clear hierarchy of streets comprising primary, secondary and tertiary streets - We agree with this approach and the principles set out. However, we note that this detailed guidance appears to conflict with the “Contemporary Spatial Typologies” set out in Part 1. As drafted in Part 1 those Contemporary Spatial Typologies are likely to cause confusion (see comments above); they should either be deleted or revised to inform the more detailed design principles set out in Part 2. We support the principles for creating great streets. However, the imagery should be revised to present a more balanced mix of contemporary and traditional architectural styles (images in table email response)</p> <p>Page 18 - We support the principles for creating great streets. However, the imagery should be revised to present a more balanced mix of contemporary and traditional architectural styles.</p> <p>Page 20 - 6. Great Homes - Whilst the principles for creating great homes that are sustainable, spacious and designed for modern living are supported the imagery should be balanced with more examples of traditional architectural styles which many people continue to have a preference for when choosing a new home.</p>

Page 23 - 7. active and healthy - We support these principles for delivering active and attractive places that encourage walking, cycling and other activities.

Page 26 - 8. Facing the climate crisis - The requirements set out in 8.1, 8.4, 8.5, 8.6, 8.7 and 8.8 go beyond what is currently and will be required through the Future Homes Standard implemented through the Building Regulations. The text should be revised to make it clear that these additional exemplary standards are encouraged but are not mandatory.

We support the aspiration for high sustainability standards for new buildings, however the BREEAM targets set out in 8.1.1 must be subject to technical and commercial viability to ensure that specific sustainability opportunities, and any constraints relating to each particular site and development proposal, are appropriately accounted for.

8.1.2 seeks certification of all new dwellings to the BRE's Home Quality Mark Five Star rating. While we support measures to ensure that homes are built to the highest quality, a requirement for five star certification for all new homes is unrealistic and unlikely to be achieved.

The Home Quality Mark website

(<https://www.homequalitymark.com/discover/how-is-it-assessed/>) states that a Five Star rating "signifies a truly outstanding home which pushes the boundaries". Similarly, a Sustainable Housing Options Paper prepared for Babergh and Mid Suffolk District Councils

(<https://baberghmid.suffolk.gov.uk/documents/3096/5516/%20Appendix%20a.pdf>) notes that, in contrast with other sustainable housing standards such as Passivhaus and Zero Carbon Homes which apply solely to the building in question, the Home Quality Mark also considers the building's surroundings including transport links, air quality and ecology. The report concludes that this difference "makes it far more difficult to construct a property with a HQM score of 4 or 5, as constructing a high quality building simply isn't enough". The report also notes that as a relatively new methodology (with only a limited number of completed new homes certified), costs for the Home Quality Mark assessment, certification and the additional build for the home are not yet known or understood among the industry. We are not aware of any Home Quality Mark Five Star dwellings having been completed to date. The requirement for five-star certification across the borough is not evidenced and likely to have a significant adverse impact on viability, and hence deliverability, of new homes.

The SPD should be amended to remove the requirement for Five Star rating and make clear that any requirement for Homes Quality Mark certification must be subject to both technical and commercial feasibility. In any event, the recent consultation on the Future Homes Standard is scheduled to introduce mandatory requirements from 2025; if necessary this could be referenced in the SPD

The ambition of 8.1.3 to move towards zero carbon homes is supported, however critical considerations include the specific "zero carbon" definition to be applied and the timescales for achieving this target.

Rather than developing their own standard for net zero buildings, it would make sense for Dacorum to apply a recognised standard applied elsewhere in the UK, for example the UK Green Building Council's Net Zero Carbon Buildings Framework (April 2019) or RIBA's Sustainable Outcomes Guide (2019). This approach will help promote a common understanding across project teams and ensure that knowledge gained from projects elsewhere is relevant and directly applicable in terms of what does and does not work as well as helping avoid the situation where national operators are required to respond to varying standards across their estate.

	<p>The requirement of 8.5.1 for building orientation and internal layouts to maximise solar gain potentially conflicts significantly with the requirement of 8.5.3 to ensure an appropriate mitigation strategy to avoid summertime overheating Section 8.5.1 should therefore be amended to note the balance that is required between maximising natural daylight within new dwellings (and therefore solar gain) with the need to avoid summertime overheating risks. Reference could also be made to the cooling hierarchy as implemented by London Plan Policy 5.9 Overheating & Cooling.</p> <p>8.7.1 seeks either the provision of solar panels and battery storage for all new homes and commercial buildings, with any buildings that do not have solar panels integrated needing to be designed to enable their future installation. It must be noted however that not all new buildings are suitable for solar panels (hence also battery storage) due to considerations including orientation, roof design and overshadowing from adjacent structures such as other buildings or trees. Such requirement is, therefore, unreasonable, particularly as it would result in increased build costs with no apparent purpose. The SPD should be amended to set out a clear aspiration for all development to support installation of renewable energy sources, in particular solar panels of battery storage, unless it is not feasible or economically viable to do so.</p> <p>8.7.2 seeks the incorporation of sustainable district heating and power networks (CHP) for large developments. It should be noted however that, due to updated carbon factors (SAP10.1) for grid electricity and mains gas, gas is now a higher carbon fuel compared with electricity per kWh. For this reason, combined heat and power (CHP) is increasingly likely to result in greater carbon emissions than (especially where mains-gas fired as is typically the case) compared with an all-electric energy strategy including heat pumps for example. The Committee on Climate Change recommends that no new dwellings are connected to the gas network from 2025, with low carbon heating provided instead such as heat pumps or connection to an appropriate heat network. The SPD should therefore be amended to recognise the significant changes in this area and that low carbon heating (e.g. air source heat pumps or heat networks) are scheduled to be required for all new homes from 2025 as part of the Future Homes Standard.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD?</p> <p>* Yes</p> <p>* No</p>	<p>Yes</p>
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>The Guide includes a number of requirements for new homes that go beyond what is currently and will be required through the Future Homes Standard implemented through the Building Regulations – this is likely to impact upon the viability and, hence, delivery of new homes in the borough. The text should be revised</p>

	to make it clear that these additional exemplary standards are encouraged but are not mandatory.
Include files	
ID	DSDG62
Person ID	1248898
Full Name	Sarah Griffiths
Organisation Details	LQ Estates
Person ID	1250850
Full Name	Mr Neil Cox
Position	
Company / Organisation	
Question 1 - Part 1: Design Process - Do you consider that the documents have identified the key characteristics of Dacorum and its wider Hertfordshire context? * Yes * No	
If no, please explain your reasons along with any suggestions for changes or additions to the key characteristics.	<p>Part 1: Design Process</p> <p>This section is intended to identify the key characteristics of Dacorum and its wider Hertfordshire context. L&Q Estates is supportive of this overall approach subject to a number of comments. Page 8 of the SPD sets out the planning process in relation to the design process. The planning process includes reference to Design Review Panels and Design Code(s). It should be clarified that these elements will not apply in all instances and the SPD should define which sites will be subject to design codes, for example strategic allocations, and define the type of applications that would be expected to be subject to the Design Review Panel. It should be clarified that where a site conforms with an adopted Design Code, it will not be required to go through the Design Review Panel.</p> <p>The 'Observing Place' section sets out a series of key topics for consideration of a site. The principle of this is supported however a number of the categories include information which go beyond what would be required to inform the design process and would not be applicable for all sites. The SPD should reflect the need for flexibility dependent on the particular context of the site. For example, the Water Section sets out that watershed boundaries are required. Whilst this is relevant to the drainage strategy for a site which should be integrated into the design, the watershed boundary is not particularly relevant to the site design and would be better focusing on water features and drainage either on-site or in the immediate vicinity. Similarly, the Environmental Exposure, Enclosure and Shelter section suggests that a site plan showing the orientation of slope, sun path, wind direction and other environmental features should be provided. This is unlikely to be relevant to all sites and should reflect the need for flexibility depending on the specific characteristics of individual sites.</p> <p>The Observing Place Checklist sets out the 'Key Outputs and Supplementary Information' that should be provided for each site. The SPD states that the Key Outputs are prescriptive. This is not supported as it is overly rigid and will require information to be provided which is not relevant to all sites, potentially at the expense of other more relevant considerations which are not listed. It is suggested that the 'Key Outputs' should be guidance and, where certain outputs are not provided, a short justification should be provided explaining why this was not necessary for this site. This would reflect the overall 'comply or justify' approach of this document. The 'Evaluating Place and Making a Place Checklists' are to be considered a starting point and may vary</p>

	<p>according to the nature of the site and proposed development. This approach is supported.</p> <p>As part of the 'Making a Place' section, the SPD sets out the ingredients of community as the SPD intends that the spatial requirements of a community should form a foundational element of the design framework. It sets out the minimum requirements for applicants and their design teams, for example this includes liaising with the Lead Local Flood Authority and Local Education Authority, amongst other requirements. These requirements should form part of pre-application discussions with the Council and the relevant consultees should be involved in this process.</p>
<p>Include files</p>	
<p>Question 2 - Part 2: Design Principles - Do you consider that the detailed design principles (as set out under each of the 10 broad categories) will be effective in securing high quality development?</p> <p>* Yes</p> <p>* No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the draft detailed design principles.</p>	<p>This section outlines Dacorum's strategic design expectations and the design process to achieve this. It makes reference to National Design Guide Principles which is supported in general however details have not been provided and this needs to be clarified and L&Q Estates wish to reserve the right to comment on these details at a later date if necessary.</p> <p>Section Five, 'Great Streets and Public Spaces' includes design guidance for highways (in particular, paragraphs 5.2, 5.9, 5.10 and 5.11). This Section should be agreed with the Local Highways Authority, including the Adoption Team, to ensure that proposals will be acceptable in highways terms and meet adoptable standards. Agreement from the Highways Authority is crucial in ensuring that design guidance is implementable. This will apply to other sections which are also relevant to highways, for example cycle parking.</p> <p>Section Seven is concerned with 'Active and Healthy Communities'. This is generally supported however incorporating food production on all sites is unlikely to be feasible. The SPD supports food production opportunities in the public realm which is often delivered in the form of allotments. Whilst provision of allotments is appropriate on some sites, on others an off-site contribution towards allotment provision is more appropriate and the SPD should reflect this option.</p> <p>Section Eight, 'Facing the Climate Crisis' sets out that all sites should meet specific sustainability standards. This may not be viable for all sites and the SPD should reflect this. It is noted that the DEFRA assessment methodology is proposed to be used for biodiversity net gain and that this should be on-site first before looking at options for enhancement of nearby natural habitats. The inclusion of SuDS as part of green and blue infrastructure is supported and it should be clarified that SuDS does form part of the on-site open space provision. Paragraph 8.3 sets out the Council's aspirations to maximise opportunities for natural drainage. Whilst this is supported, ultimately this will be determined by site-specific technical considerations. The contents of this section also needs to be agreed with the Lead Local Flood Authority. Paragraph 8.7 states that designs for large developments should incorporate sustainable district heating and power networks. It should be clarified what is considered to be a 'large' development. This should also be amended to reflect that this will not be feasible/viable for all developments</p> <p>Section Ten, 'For the Long Term' sets out the Council's aspirations for proactive stewardship by, and on behalf of the community. This would need to be facilitated by the Council, particularly if community assets were not be adopted by the Local</p>

	<p>Authority. Paragraph 10.5 sets out what should be submitted in order to secure quality at the planning stage. The elements listed at 10.5.1 and 10.5.2 are detailed matters and should not be required at outline planning stage. The SPD should make this clear.</p>
<p>Include files</p>	
<p>Question 3 - Part 3: Employment Uses Guidance - Do you consider that the guidance on designing employment buildings and areas will meet the future needs of Dacorum? * Yes * No</p>	
<p>If no, please explain your reasons along with any suggestions for changes or additions to the guidance on designing employment buildings and areas.</p>	
<p>Include files</p>	
<p>Question 4 - General Comments - Overall, do you have any other comments regarding the Draft Strategic Design Guide SPD? * Yes * No</p>	
<p>If yes, please provide you comments along with any supporting information you may have.</p>	<p>Overall, it is considered that the overall intention of the SPD is supported however there are elements which need to be considered to avoid negative implications for the delivery of sites. In particular, the SPD needs to be more flexible in order to recognise that each site is different and will require a different approach. The comments set out above highlight specific concerns. The SPD should also be considered by relevant consultees, in particular highways and drainage, to ensure that its contents are acceptable and will not cause issues, for example with highways adoption, further on in the development process.</p> <p>L&Q Estates is grateful for the opportunity to comment on the Draft SPD and look forward to continuing to engage with the Council throughout the development of this document. It is hoped that these comments are of assistance to the Council as it progresses the SPD.</p>
<p>Include files</p>	