



Local Plan 2024-2040

Revised Strategy for Growth

Consultation Report

March 2024

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1. Introduction

1.1 The Dacorum Local Plan (2024-2040) Revised Strategy for Growth sets the vision for the future of the Borough up to 2040. It includes a strategy for delivering new homes, jobs, and much needed investment across the borough. It will also provide clarity on how important infrastructure such as schools, transport and health facilities will be delivered.

1.2 The Council are grateful for the time residents, businesses and organisations have spent engaging with this document. This Consultation Report sets out the engagement process in detail, summarises the main issues raised and sets out the Council's next steps.

1.3 This report is structured as follows:

Section 2. Consultation Report: This explains how the Council engaged in the public consultation, in accordance with our Statement of Community Involvement, including the methods we used and the overall level of response.

Section 3. Analysis of Responses: This is where the Council identifies the key points raised in the responses to the consultation and demonstrates how these comments have been taken into account when preparing the final document.

Section 4. Next Steps: This sets out the timetable for the next stage of the new Local Plan.

Appendix A. Supporting Information: This provides copies of the key material used to advertise the consultation. This includes copies of the notification for the consultation and the public notice.

Appendix B. Full Text of Responses: This contains details of where to access full copies of all individual responses made to the consultation. Alternatively, you can view all responses made on the consultation webpage, by visiting ... and selecting the Dacorum Local Plan (2024-2040) Revised Strategy for Growth Consultation section.

2.Consultation Report

2.1 Background

- 2.1.1 The Revised Strategy for Growth was the third formal consultation on the new Local Plan for Dacorum. This followed on from the Issues and Options consultation, which took place over a period of 6 weeks from 1st November 2017 to 13th December 2017 and set out to gain views on high level principles and issues facing Dacorum, and from the Emerging Strategy for Growth Consultation, which took place over 13 weeks from 27th November 2002 to 28th February 2021.
- 2.1.2 The Local Plan, when adopted, will cover the period 2024-2040 and replace the Saved Policies in the Dacorum Local Plan 1991-2011, the Core Strategy 2006-2031 and the Site Allocations DPD 2006-2031.
- 2.1.3 The Government expects all Local Planning authorities to have up-to-date Local Plans in place. Having an up-to-date Local Plan will allow the Council to set local standards and requirements for development, which are informed by engagement with the local community, and implement these through its planning decisions.
- 2.1.4 The current adopted Dacorum Local Plan is becoming increasingly out of date, and this causes increased risk of the Council losing control of its planning decisions, mainly through speculative development proposals being granted at appeal. In addition to this, the Government has set a deadline of the 30th June 2025 for all Local Plans to be submitted for examination. Therefore it is important that the new Local Plan is adopted in a timely manner.
- 2.1.5 The consultation on the Local Plan (2024-2040) Revised Strategy for Growth (RSG) was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. The consultation was also carried out in accordance with the requirements set out in the Statement of Community Involvement (SCI), adopted by Dacorum Borough Council in 2019.
- 2.1.6 The consultation sought views and opinions from residents, businesses, and organisations on a draft version of the RSG, with site allocations updated from the Emerging Strategy for Growth (ESG) consulted on in 2020. This follows an extensive programme of engagement which took place in 2017.
- 2.1.7 The statutory public consultation took place for six weeks between 12pm on 30th October 2023 and 11:59pm on 11th December 2023.

2.1.8 The consultation document, copies of the responses received and other associated information can be viewed on our online consultation portal.¹

¹ <https://letstalk.dacorum.gov.uk>

2.2 Engagement Methods

- 2.2.1 Everyone registered on the Council’s Strategic Planning consultation database at the time of the consultation start date was notified of the consultation by e-mail, or by post mail when registered as preferred. This includes specific (statutory), general and other consultation bodies, alongside the wider community.²
- 2.2.2 The Council sent a separate notification of the consultation by e-mail, with promotional assets as appropriate, to 16 Town and Parish Clerks within the Borough, 10 elected County Councillors for Dacorum, all 51 Dacorum Council members, and the Council’s Senior and Corporate Leadership Teams.
- 2.2.3 We used a variety of engagement methods to advertise the consultation. Full details of the methods and levels of engagement are listed below. The figures stated below refer to the documents provided in Appendix A: Supporting Information.

Website/Digital

New Dacorum Local Plan page	5,033 visits
‘Evidence base for the new single local plan’	775 visits
News story – ‘Consultation for revised draft Local Plan gives you the chance to shape Dacorum’s future’	470 visits
‘Past consultations for the New Local Plan’	412 visits
All Local Plan related pages	Total: 6,690 visits
‘Let’s Talk Dacorum’ consultation platform page views (30/10/2023-12/12/2023)	1,315 contributions 18,373 visits
Think Hemel	News releases uploaded to website during and after consultation period.
Banner on DBC homepage	For duration of consultation
Email footer promoting consultation	Available to all staff for internal/external communications

Notifications (figures 2 and 3)

Dacorum Borough Council Local Plan - Revised Strategy for Growth Consultation Notification	Email via Let’s Talk Dacorum to all registered participants on 30 th October 2023	1,326 Individuals and Organisations (open rate 107.3%) ³
‘Last chance to have your say’ Dacorum Local Plan (2024-2040) Reminder	Email via Let’s Talk Dacorum to all registered participants on 7 th December 2023	2,185 Individuals and Organisations (open rate 70.1%)

² As set out in Part A, Section 3: ‘Who We Consult’ of the SCI: <https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/statement-of-community-involvement>

Dacorum Borough Council Local Plan - Revised Strategy for Growth Consultation Notification	Email from Strategic Planning to statutory consultees who had not re-registered with Let's Talk Dacorum on 2 nd November 2023 ⁴	31 Individuals and Organisations
Dacorum Borough Council Local Plan - Revised Strategy for Growth Consultation Notification	By post to those who re-registered to the postal database.	44 Individuals

Public Notice

Hemel Gazette (figures 5 and 6)	Published 30 th October 2023
Hemel Today website (figure 7)	Published 30 th October 2023

Press/Media

All press releases were sent to all media contacts on the DBC Communications team's media database.

Media releases were sent on:

- 27th October, announcing Full Council approval of consultation.
- 30th October, announcing start of consultation.
- 22nd November, announcing midway point.
- 7th December, reminding about the impending deadline on 11th December.
- 19th December, to say "thank you" for taking part and to explain next steps.

Publications

The consultation featured in:

- Dacorum Life Newsletter on 2, 16, 24 and 30 November; 7 and 21 December 2023 (figure 8): 12,337 subscribers.
- Business Update, on 15 and 30 November 2023: 2,331 subscribers.
- Dacorum Climate Action Network (DCAN) Newsletter, on 4 December 2023: 3,225 subscribers.
- Housing Matters, on 2 November 2023: 5,676 subscribers.

Social Media

DBC Facebook	12,000 followers (approx.)
DBC X (formerly Twitter)	8,979 followers

⁴ Prior to the launch of this consultation the Council migrated to a new consultation database and invited 6,586 individuals to re-register via email, and an additional 1,930 via post on 3rd October 2023. As the formal notification was issued to those registered with the new database on 30th October 2023, the council were clear in this notification if respondents required extra time to submit their response this would be accommodated.

DBC LinkedIn	5,277 followers
DBC Instagram	1,794 followers
Think Hemel LinkedIn – shared DBC post	306 followers

- Regular posts on DBC social media channels for the duration of the consultation gave instructions on how to take part, linked to the ‘Let’s Talk Dacorum’ page, and gave regular updates.
- ‘12 Days of Dacorum’ feature on Facebook, X and Instagram saw a daily post promote the consultation and highlight a location in the Borough every day, 30th November to 11th December.

Programmatic Advertising campaign (with Council Advertising Network Digital)

This included adverts on Facebook and a wide range of digital media sites and garnered 837,205 impressions (views) with 4,708 clicks over two weeks (27th November to 11th December).

Broken down by age of viewers:

- 13-17: 46,973 (5.6%)
- 18-24: 62,174 (7.4%)
- 25-34: 130,970 (15.6%)
- 35-44: 144,827 (17.3%)
- 45-54: 143,078 (17.1%)
- 55-64: 131,192 (15.7%)
- 65+: 127,934 (15.3%)

Local Plan Summary Video (online – YouTube)

Video available to view throughout consultation and promoted extensively via social media and embedded on dedicated Local Plan webpage: nearly 900 views.

Hard Copy Documents

Hard copies of documents were made available for public inspection throughout the whole consultation period at the three deposit points listed within the SCI:

- The Forum, Hemel Hempstead
- Berkhamsted Civic Centre
- Victoria Hall, Tring

Hard copies of documents were also made available for the public in the reference section of the seven libraries located in Dacorum during their normal opening hours:

- Adeyfield Library
- Berkhamsted Library
- Bovingdon Community Library

- Hemel Hempstead Library
- Kings Langley Community Library
- Leverstock Green Community Library
- Tring Library

Hard copies of documents were also provided to all 16 Town and Parish Councils in the Borough.

Exhibition stand

Pull-up banners, leaflets, etc. were set up in the Forum reception, for residents and staff.

Bookmarks

1200 seeded bookmarks were produced and distributed at various public events attended by the Local Plan team. Bookmarks bore the 'Let's Talk Dacorum' web address and a QR code.

Stakeholder toolkits

These contained digital versions of A3 and A4 posters for the Local Plan, A5 flyers, press release, campaign letter, a guide to access consultation materials, and social media assets.

These were sent to a number of organisations across the Borough, as well as to DBC Members, senior officers and to Parish Councils.

Dacorum Borough Council's Elected Members

- Notified 51 Dacorum Elected Members by e-mail.
- Notified 10 Hertfordshire County Councillors for Dacorum by e-mail.
- Members' news: Notified of consultation using the weekly e-newsletter on the ...

Public events

DBC officers working on the Local Plan were present at the following public events with informational and promotional materials on the local plan consultation and engaged with members of the public in attendance.

Christmas Fairs:

- 18th November - Hemel Christmas Lights - Marlowes - 11am-6pm
- 25th November - Tring Christmas Festival - Victoria Hall - 3:30pm-8:30pm
- 26th November - Berkhamsted Festival of Lights - High Street - 3:30pm-6pm

Forum Events:

- 20th November - Dacorum Climate Action Network Annual Conference - 6pm-9pm
- 29th November - Housing Open Day - 3pm - 7pm

Parish/Town Council Meetings / Community Meetings:

- 6th November – Bovingdon Parish Council - 7:30pm

- 16th November – Redbourn Parish Council - 7:30pm
- 20th November - Great Gaddesden Parish Council - 7:30pm
- 27th November – Grovehill Community Centre - 7:30pm
- 4th December - Woodhall Farm Community Centre - 7:30pm
- 4th December - Tring Town Council

Youth Councils:

- 15th November - Tring Youth Council – Tring Town Hall - 4pm
- 23rd November - Dacorum Youth Council - Bennett's End Youth Centre - 6pm-8pm
- 30th November - Berkhamsted SWAN Project - Ashlyns School - 3:20pm

2.3 Making Representations

2.3.1 Feedback on the Local Plan 2024-2040 – Revised Strategy for Growth was invited as a survey on the engagement portal, “Let’s Talk Dacorum”.

2.3.2 The comments form could be completed using our online consultation portal. The portal was advertised by providing a hyperlink in a variety of locations, including on the Council’s Local Plan webpage, as part of consultation notifications and within other advertisements for the consultation. The portal provided the option of comments on the draft RSG, as well as supplementing responses with additional material.

2.3.3 If it was not possible to make comments directly on the consultation portal, responses could also be accepted by post to:

Strategic Planning, The Forum, Marlowes, Hemel Hempstead, HP1 1DN.

2.3.4 For those making comments by post, a downloadable and editable comments form (see figure 9) was provided on the Local Plan web page. This could be printed out and posted as a letter. Copies were also made available at libraries across the borough.

2.4 Overview of Responses

2.4.1 The following sections provide a high-level summary of the number of responses received, and the demographics of respondents. This is followed by an overview of key themes arising from the responses as a whole.

Level of Response

2.4.2 The consultation received a total of 1,356 comments. 1,315 of these responses were made directly within the online consultation portal. 41 responses were received via post. Two communications were also received from MPs relating to concerns from constituents in Hemel Hempstead and Berkhamsted respectively. The MPs letters were responded to directly.

Sources of Traffic

2.4.3 The number of visits to the online consultation portal between the consultation dates are as follows:

	Visits to All Pages	Visits to Survey	Responded to Survey
Direct (typing the URL directly into the address bar / QR code)	6,118	2,992	820
Social Media	5,118	1,059	98
Email campaigns from Let’s Talk Dacorum	1,572	783	210

Dacorum Website	810	432	105
Search Engine searches	284	131	50
Referrals (Links on any other non-government website.)	256	121	31

Demographics

2.4.4 Demographic data was optionally collected in the registration process for users of Engagement HQ. Data was collected on respondents' date of birth, gender, ethnicity and disability. This is the first time the Council has recorded demographic data for a consultation of this nature.

2.4.5 The following tables include breakdowns of these categories accordingly, considering the full total of 1356 responses, including those by respondents who chose not to or did not have the option to submit demographic data.

2.4.6 Only the 1,315 respondents using the online survey had the option to provide demographic data. Out of these, 703 respondents chose not to answer additional demographic questions on registration (54.9% of respondents).

Table 1: Decade of birth of respondents

Decade of birth	Number	Percentage (of total responses)	Percentage (of respondents to this question - 538)
<i>Did not provide demographic information</i>	744 (includes 41 postal responses)	54.7	-
Not given	74	5.5	-
Mistaken*	17	1.3	3.2
2000 onwards**	4	0.3	0.7
1990-1999	25	1.8	4.7
1980-1989	78	5.8	14.5
1970-1979	115	8.5	21.4
1960-1969	125	9.2	23.2
1950-1959	115	8.5	21.4
1940-1949	54	4.0	10
1930-1939	5	0.4	0.9

* Officers have assumed this on the basis that an individual born on the registered year of birth would not possibly be able to respond and the only explanation would be an error registering the date.

**you must be at least 13 years of age to register on 'Let's Talk Dacorum' without permission from a parent/guardian.

2.4.7 The median age of respondents (at the time of their response) was 56 years old, this is higher than the median age of the borough - 40 years old (census 2021).

Table 2: Gender of Respondents

Gender	Number	Percentage (of total responses)	Percentage (of respondents to this question - 603)
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<i>Did not provide demographic information</i>	744	54.7	-
Not given	9	0.7	-
Agender	0	0	0
Male	305	22.5	50.6
Female	290	21.4	48.1
Non-Binary	2	0.1	0.3
Transgender Female	0	0	0
Transgender Male	1	0.1	0.2
I use a different term	0	0	0
Prefer not to say	5	0.4	0.8

Table 3: Ethnicity of Respondents

Ethnic Group	Number	Percentage (of total responses)	Percentage (of respondents to this question - 578)
<i>Did not provide demographic information</i>	744	54.7	-
Not given	34	2.5	-
Bangladeshi or British Bangladeshi	0	0	0
Chinese or British Chinese	0	0	0
Indian or British Indian	2	0.1	0.3
Pakistani or British Pakistani	2	0.1	0.3
Other Asian or British Asian	0	0	0
Black or Black British - African	0	0	0
Black or Black British – Caribbean	1	0.1	0.2
Other Black, Black British or Caribbean	1	0.1	0.2
Mixed White and Asian	2	0.1	0.3
Mixed White and Black African	0	0	0
Mixed White and Black Caribbean	1	0.1	0.2
Other Mixed	3	0.2	0.5
Arab	0	0	0
Kurdish	0	0	0
Latin American	0	0	0
Turkish	0	0	0
White English, Welsh, Scottish, Northern Irish or British	515	38	89.1
White Irish	4	0.3	0.7
White Gypsy or Irish Traveller	0	0	0
White Roma	0	0	0

Other White	31	2.3	5.4
Prefer not to say	16	1.2	2.8

Table 4: Respondents with a physical or mental health condition(s) or illness(es) lasting or expected to last for 12 months or more, and how this affects their ability to carry out day to day activities:

Physical or mental health condition(s) or illness(es) lasting or expected to last for 12 months or more	Number	Percentage (of total responses)	Percentage (of respondents to this question - 578)
<i>Did not provide demographic information</i>	744	54.7	-
Not answered	11	0.8	-
No	525	38.7	87.4
Yes, this affects their ability to carry out day to day activities a lot.	8	0.6	1.3
Yes, this affects their ability to carry out day to day activities a little.	29	2.1	4.8
Yes, prefer not to say how this affects their ability to carry out day to day activities.	2	0.1	0.3
Yes, this does not affect their ability to carry out day to day activities at all.	20	1.5	3.3
Prefer not to say	17	1.3	2.8

Table 5: Most Common Post Codes of Respondents

Post code	Number	Percentage
HP4	447	33
HP23	241	17.8
HP1	188	13.9
HP2	186	13.7
HP3	119	8.8
WD4	37	2.7
AL3	10	0.7
Other	101	7.4
Did not answer	27	2

Overview of Key Themes and Issues

2.4.8 The detailed responses are summarised in Section 3 (Analysis of Responses) and a full list of responses made can be found in **Appendix B**.

2.4.9 The consultation attracted a large number of views from individuals, statutory bodies, developers and other interest groups. A diverse range of views were expressed from those strongly objecting to the Plan to others strongly supporting it.

2.4.10 The following sets out some of the general themes emerging, in no particular order. Please refer to Appendix 1 for a wider summary of key themes and issues:

- Over a third of respondents supported the RSG, while a little over half objected. Support was highest in Tring and Kings Langley, where reductions were greatest, and objections were highest in Hemel Hempstead which has received the only increase in allocations.
- Respondents were most concerned about losing green spaces in the Borough and the ability of infrastructure (particularly healthcare and traffic) to cope with the increased housing.
- A large number of respondents welcomed the overall reduction in proposed Green Belt site allocations, however respondents continued to express concern regarding the remaining Green Belt development.
- Conflicting issues were raised between residents of the borough's market towns welcoming the renewed focus on Hemel Hempstead for growth, and residents of Hemel Hempstead requesting that the strategy adopt a more proportionate approach to growth in the Borough.
- Additionally, a number of respondents raised concerns with the development of brownfield sites within Hemel Hempstead and the impacts this would have on existing infrastructure pressures and historic sensitivities in the areas of focus.
- Many residents questioned the ability of infrastructure to accommodate the proposed growth, particularly healthcare, roads and education provision, and requested more certainty into the mechanisms for delivering infrastructure.
- A substantial number of responses made by housing and planning professionals raised concerns with the soundness of the revised strategy and questioned how the council was justifying a reduced target for housing growth.
- Detailed representations were made to the Council from landowners/developers of sites included in the consultation and also of sites that were not included in the consultation. These representations raise a number of conflicting issues and further evidence gathering may be required to examine the issues raised.

2.4.11 It is important to note that the above issues are not exhaustive. Moreover, the absence from the above list does not mean it is not considered to be a key issue for the Local Plan.

3. Analysis of Responses

Introduction

This section of the report summarises the key themes emerging from the responses.

The main part of this summary focuses on responding to the settlement specific issues raised and is structured as follows:

- 3.1 Dacorum (Whole of Borough)
- 3.2 Hemel Hempstead
- 3.3 Berkhamsted
- 3.4 Tring
- 3.5 Bovingdon
- 3.6 Kings Langley
- 3.7 Markyate
- 3.8 Countryside
- 3.9 Other (please specify)

Please note that respondents could select multiple areas to comment on through the survey. General issues raised (where applicable) are summarised under section 3.1. For the remaining sections only settlement specific issues raised in responses have been included.

We have grouped responses to reflect the structure of consultees in our Statement of Community Involvement (SCI):

- **Specific Bodies:** also referred to as 'Statutory Bodies' in the SCI, these are the bodies that we are bound to work together with by the Duty to Cooperate, the National Planning Policy Framework and also any locally prescribed bodies.
- **General Bodies/Other Organisations:** these include but are not limited to, voluntary organisations representing certain groups within the community, environmental groups, local residents' associations, landowners and housebuilders.
- **Wider Community:** this category includes those who live, work or visit the Borough, who are making comments relating to their own personal views and are not responding on behalf of an organisation.

This is followed by a brief analysis of the responses made to the optional questions participants could choose to answer in addition to the main survey. These are structured under the following headings:

- 3.10 Infrastructure Priorities
- 3.11 Evidence Base
- 3.12 Consultation Feedback
- 3.13 Call for Sites

Full text of the responses to the consultation can be found in **Appendix B** of this document.

3.1 Dacorum (Whole of Borough)

- 3.1.1 Survey respondents had the option to select to which settlement area their response related. 243 responses (17.9%) selected Whole of Dacorum, of which 8 were postal responses.
- 3.1.2 Of these, 91 (37.4%) said they 'agreed' or 'somewhat agreed' with the proposal, while 121 (49.8%) 'disagreed' or 'somewhat disagreed' and 31 (12.8%) were neutral.
- 3.1.3 Survey respondents had the option to select their five infrastructure priorities. For those respondents who selected Whole of Dacorum, their top five priorities were:
- | | |
|------------------------------------|--------------|
| 1) Healthcare | 55 – (22.6%) |
| 2) Green space and play facilities | 49 – (20.2%) |
| 3) The road network | 39 – (16.0%) |
| Public transport | 39 – (16.0%) |
| 5) Community facilities | 33 – (13.6%) |
- 3.1.4 This ordering for “Whole of Dacorum” responses was almost identical to that of the overall responses, unsurprisingly, although “Public transport” was slightly more prioritised.
- 3.1.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

Specific Bodies

- Affinity Water notes that a number of proposed developments sites are located within an Environment Agency groundwater SPZ corresponding to groundwater abstraction locations and Pumping Stations.
 - Affinity Water would normally ask for conditions that minimise risks to public water supply when considering plans for new developments within SPZ1s and encourage developers to engage with them in the early stages of development to ensure there is no impact on public water supply.
 - These include risks from construction works causing contamination including turbidity, or changes to surface water infiltration.
 - Eight sites are noted as located within SPZ1s: Berkhamsted Civic Centre, Civic Centre Site, North Hemel, Old Town, Town Centre Opportunity Area Broad Location, Watling Street Truck Stop, London Road, West Hemel Hempstead.
 - Affinity Water have identified several areas where their mains apparatus intersects sites for future (re)development of existing sites. No development

will be permitted within a specified distance of these services. Where there is potential to affect the existing water network, they expect these impacts to be fully considered and for developers to discuss these with them early in the process.

- Ten sites are noted as having significant critical mains apparatus within their boundaries: NCP Car Park Hillfield Road, Station Gateway, North Hemel HGC, Two Waters/ London Road Junction, Land at Turners Hill, Old Town, Mill Bank Lane, Berkhamsted Civic Centre, South of Berkhamsted, and Watling Street Truck Stop.
 - The demand increase due to the Dacorum Borough Council Domestic sites will be approximately 6.2 Ml/day (13,777 domestic units) with pressures at the critical points in the network due to the new developments such that major reinforcements will be required. This normally means new pipelines although in some cases new pumping stations will also be required.
 - Affinity Water have a number of reinforcement schemes either newly completed or in the pipeline to help transfer water for developments, for resilience and protecting chalk streams. However, it is still likely, due to this growth, that there will be ongoing requirement to carry out some reinforcements to our existing infrastructure. All proposed reinforcements will aim to recover the current level of service and the loss of capacity in the network due to the additional load imposed by all projected development.
 - However, nearby Local Authorities are also projecting a significant increase in demand which can influence the nature and pace of planned infrastructure required in the area for future growth. Therefore, Affinity Water strongly encourage early engagement on plans for future development, to ensure they can effectively plan for the impacts of the associated increase in demand. All projections of infrastructure capacity are subject to developers and customers reducing their PCC (Per Capita Consumption) in accordance with our WRMP (Water Resources Management Plan) through the development of water-efficient buildings and encouraging customers to save water.
 - Affinity Water encourage every local authority to have a water-use target set for new development of 110 litres per person per day or less. Plans for new developments should therefore include this requirement.
 - For new developments they also expect the use of water-efficient fittings and fixtures such as rainwater harvesting, rainwater storage tanks, water butts, green roofs, and water efficient appliances in all new developments.
- The Canal & River Trust want the Council to acknowledge their waterways as significant blue/green infrastructure within the Local Plan and as part of the historic environment, the character, cultural and social focus of the plan area.
 - The C&RT notes the important role of the Grand Union Canal and the Tring reservoirs in delivering aspirations for sub-regional and local accessibility particularly in increasing walking for local trips, such as those of Hertfordshire County Council to complete a high-quality active travel route between Watford and Apsley for which funding will be sought.

- The C&RT believes the Council should promote the towpath as an active Travel Route throughout the plan, with site allocations to contribute to its improvement where appropriate. As overall growth proposed would place additional burdens onto the waterway infrastructure, works to towpaths would be necessary to address the extra traffic, as well as safety upgrades for reservoirs. Improved wayfinding, signage, access and water recreational facilities would also need to be provided and funded.
- Central Bedfordshire Council supports the redistribution of allocations to Hemel Hempstead as sustainable, to reduce pressure on infrastructure in smaller settlements and protect the greenbelt, AONB and SAC.
 - CBC would appreciate clarification to reasons for deletion other than overlaps with other sites, planning permission or being under construction.
 - CBC notes that the reduction in housing targets is considerable and not justified and considers it inappropriate for providing additional levels of uncertainty for neighbouring authorities regarding unmet need.
 - CBC supports the SANG approach.
- The Chilterns Conservation Board (CCB) provide the following summary:
 - CCB recommend that the AONB Boundary Review is also acknowledged as a matter that will run in parallel with the progression of the plan and potentially influence its content.
 - CCB request clarification on the spatial arrangement of the dwellings within the HGC area, with a graphic comparing 2020 and 2023 proposals.
 - CCB request greater discussion of the SANG area to be associated with the HGC proposal.
 - CCB request greater discussion and consideration of the Land East of Tring decision.
 - CCB supports the LPA's reappraisal of housing numbers and their distribution when local considerations and constraints are taken into effect. CCB notes that the new section 245 of the 11 Levelling Up and Regeneration Act (LURA) considerably bolsters the legal duty to conserve and enhance the AONB.
 - CCB notes the lack of a specific strategy or future policy reassurance on Chalk Streams and their protection within section 41 of the Natural Environment and Rural Communities Act 2006 and as dealt with in the AONB Management Plan 2019-2024.
 - The Chiltern Beechwoods SAC mitigation strategy is wholly supported, and the LPA is commended for its delivery. The Council's adherence, indeed, exceedance, to these SANGs mitigation is also commended.
 - CCB would propose to comment on detailed development management policy wording at subsequent stages as such detail is anticipated.
- The Defence Infrastructure Organisation (DIO) Safeguarding Team note that DBC is washed over by safeguarding zones associated with RAF Halton, specifically aerodrome height and birdstrike safeguarding zones. Depending on the statutory

safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

- These safeguarding zones that would apply to each of the potential development sites identified.
 - Bk01: Land South of Berkhamsted - RAF Halton (birdstrike safeguarding zone).
 - Tr01: Dunsley Farm - RAF Halton (birdstrike safeguarding zone).
 - Cy04: Haresfoot Campus, Chesham Road, Berkhamsted - RAF Halton (birdstrike safeguarding zone).
- The MOD may also have an interest where development is likely to have any impact on operational capability, usually by virtue of the scale, height, or other physical property of a development. Examples include:
 - Solar PV development.
 - Wind turbines.
 - Any development over a height of 50m above ground level.
- East of England Ambulance Service NHS Trust (EEAST) confirm that there will be an increased requirement for ambulance facilities necessitated by the planned housing and population growth arising over the period 2024 - 2040 and beyond.
 - Population increase, deprivation, and longer life expectancies will all impact on the level of ambulance service demand, in respect of both emergency and non-emergency patient transport services.
 - EEAST requires developer funding to mitigate the impacts on its already at-capacity services from the population increase associated with planned housing growth.
 - Based on EEAST's activity rates and experience from other local authority areas within the East of England, they consider that a developer funded 'standard charge' of £340 per dwelling is necessary to fund the increased operational capacity.
 - EEAST acknowledges that the planned housing sites may be the subject of viability testing and would be content to be flexible in its approach to the level of funding to be secured for ambulance service infrastructure & facilities, on a site-by-site basis as necessary.
 - EEAST will assess on its merits each future resident-led planning application to determine the likely funding required. The funding would be secured via a planning obligation and/or the Community Infrastructure Levy (CIL) charging process, as appropriate.
 - EEAST welcomes the draft Local Plan's commitment to ensure necessary infrastructure and services are integrated into new developments, and endorses its approach, including the preparation of an updated Infrastructure Delivery Plan (IDP).
 - EEAST require the Council to reflect in the next Regulation 19 version of the draft Local Plan and in the updated Infrastructure Delivery Plan the need for developer-funded ambulance facilities.

- The Environment Agency (EA) make the following comments:
 - The EA note that the Level 1 Strategic Flood Risk Assessment (SFRA) for South West Hertfordshire, which should be reviewed on a rolling basis, is now 5 years old. The Council must review its modelling to ensure that development is being driven by accurate data.
 - The EA confirms an SFRA will be required for all sites within the flood plain.
 - Development of a surface water management plan is recommended for a local authority to satisfy its legal obligation to prevent surface water flooding.
 - The EA recommend that any developments required to complete an Environmental Impact Assessment conduct a site-specific water cycle study as part of their evidence base.
 - The EA make a number of detailed comments on the sustainability appraisal and habitats regulations assessment.

- Great Gaddesden Parish Council welcomes the reduction in housing but object to any Green Belt release, particularly when no exceptional justifying circumstances are provided. The parish council request that local housing needs are prioritised as opposed to national.

- Hertfordshire Constabulary could not find any reference to the emergency service facilities or supporting these organisations in the revised local plan.
 - They note that the Local Plan needs to give consideration to the facilities for the police and other emergency services, and how they will be affected by the increased demand on their services and the expansion of Hemel to the North and the East. This may need to be considered for section 106 funding to ensure emergency services' facilities can be improved to meet demand.
 - Hertfordshire Constabulary also request consultation by the Council on safety and security in neighbourhoods when designing new planned communities, in particular HGC, and that the Council bear in mind access for emergency vehicles.

- Hertfordshire County Council (HCC) refer to the necessity of Section 106 and CIL funding to deliver County ran services on a number of allocations and welcome a discussion with Dacorum Borough Council on how access to developer contributions will function under a new Local Plan.
 - HCC state that they will need to reconsider any redrafted development management policies prior to Regulation 19.
 - Transport services' previous comments on the plan's overall policies and sites remain as there have been no major change to HCCs overall approach to plan making in terms of transport. Further transport work will be required and should be evident in site specific policy and correlate to an IDP.
 - Ecology service primarily refer back to their response to the 2020 Regulation 18 Consultation asides from sites NEW1 and NEW2.
 - Lead Local Flood Authority services state that the Sequential Test must now consider all sources of flood risk (previously, sequential testing only applied to

- fluvial flood risk). Therefore, the Council may wish to update the SFRA and sequential testing to inform site allocations. For avoidance of doubt, the sequential test should consider all sources of flooding including fluvial (Flood Zone 2/3), ordinary watercourses, pluvial (surface water) and groundwater.
- Lead Local Flood Authority SuDS services cannot accept below-ground attenuation on greenfield sites. All greenfield sites will also be required to restrict discharge to greenfield rates and volumes. Brownfield sites should seek to discharge at greenfield rates and volumes and can and should make use of above-ground SuDS and will need justification where not possible. All sites must consider the SuDS hierarchy in the choice of SuDS features (e.g. basins, permeable paving, and attenuation tanks). All sites should conduct ground investigations including confirmation of groundwater levels and infiltration rates.
 - Public Health services attach guidance on healthy places and state that across the plan new housing sites should be delivered in accordance with healthy places principles.
 - Education services attach a detailed statement and refer to SEND requirements increasing by 15% every year from 2015 to 2021. HCC continues to focus on addressing the identified priorities of the Special School Place Planning Strategy 2020-2023 and state that solutions to meet the needs of pupils with SEND cross LPAs and contributions may be sought across LPAs for individual projects. S106 (or CIL) will be needed proportionately to fund the delivery of new provision as required.
 - Early Years services state that S106 or CIL will need to be made available to fund the wider childcare and nursery requirements for the plan.
 - Adult Care services attach a detailed note on older people's accommodation.
 - Services for Young People will seek to increase services available to young people in accordance with their Service Priority Themes. S106 or CIL will need to be made available to fund increased service capacity.
 - Libraries services state that S106 or CIL will need to be made available to fund an increase in resources at existing libraries.
 - Minerals and Waste Planning Authority (MWPA) services have provided comments on individual sites in the Revised Strategy for Growth relating to the safeguarding of minerals and waste infrastructure and of sand and gravel deposits and the management of waste arising from the demolition and construction of built development.
- Hertfordshire Local Enterprise Partnership and Herts Innovation Quarter raised the provision of Key Worker housing and query how the new Local Plan addresses this.
 - HLEP and HIQ welcome the draft Local Plan for measured and controlled growth to the benefit of its residents, businesses and visitors.
 - HLEP and HIQ believe that more could be made of Hemel Hempstead's strategic location close to London and UK strategic road network and relatively close to four international airports.

- Historic England identify in their response that there is a lack of detailed and proportionate historic environment evidence to support the new Local Plan, contrary to paragraphs 31 and 35 of the NPPF, and recommend the production of Heritage Impact Assessments for sites in close proximity to heritage sites.
 - HE emphasises that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible, and alternative options should be pursued. Only when these impacts are unavoidable should suitable mitigation measures be proposed. Further details are provided below.
 - HE refers the Council to their Advice Note 3 'The Historic Environment and Site Allocations in Local Plans' for more information.
 - HE strongly recommends that HIAs are prepared for large strategic sites (such as HH01/HH02: North Hemel) or for sites where there are heritage issues, for instance, a highly graded heritage asset either on-site or in proximity, with more evidence expected for larger sites or more important heritage issues.
 - HE highlights that although sites may seem relatively unrestricted from a historical environmental perspective, their limited size could potentially pose challenges for mitigation, and this could affect their capacity.

- Little Gaddesden Parish Council believes the strategy will cause harm to villages in the north of the borough, particularly regarding traffic, and requests that Policy CS7 development protections as in the Core Strategy (2013) is carried forward.

- Luton Council do not have any comments to make on the revised strategy.

- Natural England agree with the screening in of all sites within the Chilterns Beechwoods SAC 12.6km Zone of Influence (ZOI) as part of Habitats Regulations Assessment.
 - Natural England state that the Plan should include a SANG strategy that broadly details how each allocation will deliver its SANG provision. This should include a map identifying existing and future SANG sites within Dacorum, their potential capacity and catchments for new development, and consideration of how proposed SANG connects with the wider landscape to maximise the benefits for people and nature. This could also consider the supply and demand of biodiversity units for Biodiversity Net Gain (BNG).
 - Natural England would welcome a specific policy to protect rare chalk stream habitats within the Borough and encourage opportunities for their enhancement and restoration while considering the watercourses metric for BNG, which requires a 10% Net Gain for streams and watercourses.
 - Natural England agrees with the conclusions of the preliminary Appropriate Assessment (AA) for the Chilterns Beechwoods SAC, including that adverse air quality impacts cannot be ruled out at this stage.
 - Natural England also agree with the preliminary AA conclusions with respect to the South West London Waterbodies.
 - Natural England note that air quality modelling is in progress along the B4506 and would appreciate early sight of the results of this modelling in order to

inform discussions around potential mitigation options, should the modelling suggest that mitigation is required.

- National Highways East Region's (NHER) principal interest is in safeguarding the operation of the M1, specifically junctions 8 and 9, and junction 20 on the M25.
 - NHER notes the Department of Transport's (DfT) revised Circular 01/2022 - Strategic Road Network and the delivery of sustainable development ('the Circular') which sets out how interactions with the Strategic Road Network (SRN) should be considered in the making of local plans.
 - NHER recommends the Council consult with them on any potential site that may impact the SRN in the area, so that they can appropriately assess it in line with DfT Circular 01/2022. The applicant/developer may need to identify suitable mitigation measures (if required).
 - NHER expects developments to submit a Transport Assessment (TA) or a Transport Statement (TS) along with a Travel Plan (TP) during statutory consultation.
 - The cumulative impact of the proposed site allocations needs to be assessed in line with the Circular for understanding the likely traffic impacts on the SRN in the area in terms of capacity and safety and identifying any possible mitigation measures (if required).
 - NHER wishes to continue to liaise with the Council and neighbouring authorities on the Local Plan to understand which sites the Council will allocate and the potential impacts of these on the SRN.
 - NHER would expect the evidence base to be detailed within Regulation 19.
 - NHER refers to the SRN in and around Hemel Hempstead, Markyate and Kings Langley.
 - NHER notes that the Council will prepare and submit an Infrastructure Delivery Plan in support of the Regulation 19 consultation. NHER want the Council to consult on any infrastructure proposals identified for the SRN to understand the impacts, cost and potential trigger points of when the infrastructure would be required within the plan period. They encourage the Council to engage early with them to identify any infrastructure required on the SRN.
 - NHER advises a joined-up approach to consultation for any developments that have an impact on neighbouring Local Authorities. NHER and the Council are already doing this, which they welcome.
 - National Highways will actively work with Dacorum to develop and draft a Statement of Common Ground (SoCG) to deal with any strategic cross boundary issues as the Local Plan progresses.

- Nettleden with Potten End Parish Council (NWPEPC) disagrees with the revised strategy, while welcoming the reduction in total housing numbers and the focus on urban areas, they object to further release of any Green Belt land. The parish council also reject the term 'Local Housing Need' and request a statement of Dacorum's internal housing needs. The parish council also note that the plan lacks a transport

strategy.

- NHS Hertfordshire and West Essex Integrated Care Board (HWE ICB) supports the draft local plan and is committed to work alongside the Council to ensure investment is directed to health provision in Hemel Hempstead.
 - NHS HWE ICB would welcome engagement with the upcoming updated Infrastructure Delivery Plan (IDP), regarding health priorities and their Estates Infrastructure Strategy.
 - Due to significant planned housing growth, HWE ICB and partners will deliver more joined-up care and explore opportunities for primary and community healthcare hubs.
 - HWE ICB will seek to ensure health facilities are on a level footing with education and public transport regarding funding.
 - HWE ICB notes that any delay in the adoption of the plan or subsequent changes to housing targets will impact its long-term health planning. As the revised plan is 'at risk' of rejection regarding its soundness, the HWE ICB are concerned about the effect of such a rejection on their long-term plans.
 - HWE ICB supports redistribution to Hemel Hempstead as creating more accessible and connected settlements which are healthier to live in.
 - HWE ICB notes no reference to previously identified on-site medical provision in the Hemel Garden Communities Position Statement or Framework Plan. Dacorum Borough Council and St Albans District Council should align their plans on health infrastructure to avoid NHS needs falling unaddressed.
 - There is some capacity in individual surgeries in Dacorum, but all Primary Care Networks and settlements as a whole are currently constrained with limited ability to accept new patients.
 - HWE ICB details recent, ongoing and proposed investments in primary care infrastructure across Dacorum. HWE ICB will seek developer contributions to offset forward investment, through Section 106 agreements or CIL.
 - HWE ICB provides indicative costs per metre squared for mental health and community health service developments.
 - HWE ICB notes that large parts of the West Hertfordshire Teaching Hospitals Trust are in extremely poor condition and is planning significant redevelopment.

- NHS Property
 - NHS Property encourage that flexibility be granted to the NHS via the wording of any planning policy aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition.
 - NHS Property state that health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects.

- They also recommend specific policy requirements to promote healthy developments.
- St Albans City & District Council (SADC) looks forward to continuing productive Duty to Cooperate work with Dacorum Borough Council (DBC).
 - SADC welcomes the DBC draft Local Plan consultation, especially the approach to Hemel Garden Communities.
 - SADC proposes a plan period ending in 2041, as per NPPF paragraph 22.
 - SADC supports and looks forward to further discussion about the approach to Affordable homes, including potential impacts on viability and deliverability and Hemel Garden Communities.
 - SADC supports the recognition that windfall plays a significant part in housing delivery. They look forward to further discussions about how the Council has derived the windfall figures.
 - SADC notes the lower housing approach and raises concerns that DBC does not appear to be meeting the Standard Method figure for calculating Local Housing Need of 1,018 homes per annum in full. SADC does not currently consider that it has any capacity to support DBC in meeting its housing need.
 - DBC will need to be able to evidence that it has fully explored all reasonable options for meeting its housing need within the Borough. This includes, as also previously raised, within the land beyond the Green Belt and the Area of Outstanding Natural Beauty in northwest Dacorum. This full exploration is in the context of the rest of South West Herts, including St Albans City & District in particular, being fully bounded by the Green Belt.
 - SADC would welcome discussions about the DBC approach to NPPF paragraph 69 (a) during the approach to the Regulation 19 Publication stage.
- Thames Water (TW) have reviewed the sites in the latest consultation document and appended high level comments in relation to the potential sewerage infrastructure implications (see relevant responses to the settlements).
 - Overall, changes to the growth strategy are unlikely to result in significant changes to impacts on sewage infrastructure. Localised network upgrades are likely to be required and will need to be delivered ahead of the occupation of development.
 - TW are keen to work closely with the Council to understand the level of development that will come forward and where this will be in the district.
 - TW welcome early engagement over any potential changes to proposed allocations or the quantum of development proposed through the new Local Plan, so this information can be used to inform future growth plans.
- Three Rivers District Council (TRDC) note that the standard method as resulting in a local housing need calculation of 1,023 homes per year in Dacorum, although the revised growth strategy shows a further reduction to 900 homes per year from 950 in the previous growth strategy.
 - TRDC support the spatial distribution strategy to direct development towards the largest and most sustainable settlements of Hemel Hempstead, Berkhamsted and Tring and more modest growth in the smaller settlements of Bovingdon, Kings Langley and Markyate.

- TRDC notes the government's intention to overhaul the planning system and asks to be kept informed of any changes relating to the new NPPF as DBC progresses.
- TRDC is committed to continuing with ongoing discussion and continued collaboration with regard to local planning matters through the Duty to Cooperate process.
- Watford Borough Council (WBC) notes the number of dwellings planned for in the 'revised strategy' has reduced by 15% while housing planned for in Hemel Hempstead has increased.
 - WBC acknowledges the difficulty local authorities are experiencing in trying to meet the nationally set standard method and share the belief that the process produces inappropriately high housing targets for many areas.
 - WBC recognises that 88% represents a very high proportion of this need being met within the 'revised strategy'. However, to justify the proposed level of housing relative to the standard method, exceptional circumstances will need to be demonstrated in accordance with paragraph 61 of the NPPF.
 - WBC makes clear that there is no suitable or available capacity within Watford to assist DBC in meeting the shortfall in housing proposed.
 - WBC has been working constructively with DBC on the development of the Local Plan and will continue to do so and welcomes continued collaboration on the South West Hertfordshire Joint Strategic Plan.

General Bodies

- Adrian Cole FRICS Ltd notes:
 - That reduced housing levels risk the plan being found unsound.
 - Identified sites are generally those owned by DBC and HCC at the expense of private landowners.
 - No reference to individual SANG provision.
 - No specific policy or sites for Retirement Schemes.
- Armstrong Rigg Planning, on behalf of Barratt David Wilson Trading Ltd and Taylor Wimpey, notes the time being taken to produce a new Local Plan, and states that the plan period should be extended to 2042, that housing growth should align with the Standard Method figure, and thus that all deleted allocations, including their site HH21 West Hemel Hempstead, be reinstated.
- Bidwells on behalf of Vistry Group and Crest Nicholson stresses concerns that continued under delivery of housing may worsen affordability within the Borough, limit job creation, and marginalise those who cannot afford their own home and those in need of specialist housing such as older people.

- Bidwells notes that the NPPF states that the minimum number of homes planned should align with the Standard Method.
 - Bidwells advocates for the plan period to be extended to 2042.
 - Bidwells is concerned about the impact of unmet need from London and neighbouring boroughs.
 - Bidwells notes that a housing land supply buffer will further increase the minimum housing and so more land should be allocated for release from the Green Belt and development.
- The British Driving Society and British Horse Society welcomes the use of more brownfield sites in Hemel Hempstead the reductions in development plans in smaller settlements.
 - BDS/BHS states that all planning approvals should support the Council's Climate Emergency declaration, suggesting that paragraph 1.2 be amended to include: 'Maximise the support of measures to reduce climate change'.
 - BDS/BHS states that planning approval should mandate for all homes and commercial buildings: heat pumps and/or solar panels; that all buildings have south-facing roofs; electric vehicle charging points, and necessary electric grid upgrades to be funded by S106 and/or CIL contributions.
 - BDS/BHS states that developers who purchased land at agricultural valuations and then sold it on for development should be requested to subsidise affordable homes planned on the site.
- Butterfly Conservation – Hertfordshire and Middlesex Branch notes that 35 butterfly species are resident or common migrants in Dacorum, but overall populations are severely depleted.
 - BC-HMB notes that 12 species have died out in Dacorum in the last century (1 in 4) while common butterfly numbers are declining by approximately 2% a year across the UK. Many moth species are suffering a similar decline.
 - Seven butterfly species in Dacorum are specially protected and loss of habitat to development is one of the primary threats to butterfly populations.
 - BC-HMB states that White-letter Hairstreak in particular should have its habitat requirements considered at every site.
 - BC-HMB notes that wildflower meadows have declined by 98% over the last century and thus the Council ought to step up creation of meadows, channelling development away from sites with the most wildlife value, enhancing biodiversity elsewhere, and improving connectivity between enclaves.
 - BC-HMB thus welcomes the removal of site allocations around smaller towns and villages but would prefer still further reductions in overall development.
 - BC-HMB demands that sites designated as Local Nature Reserves or Wildlife Sites automatically be considered as Red in the SHLAA.
- Carter Jonas on behalf of Apsley Developments Limited considers the proposed plan unsound for not fully meeting the Borough's housing needs.

- CJ notes that windfall has been calculated by assessing past delivery trends, without demonstrating that past trends are still applicable or repeatable.
- CJ points out that lapsed planning permissions should be removed from the calculation of sites with planning permission.
- CJ refers to the delivery of only four affordable dwellings delivered through rural housing schemes over a 14-year period, an acute lack of family-sized dwellings, and the ONS housing affordability ratio for Dacorum of 13.9.
- CBRE is representing Landhold Capital on behalf of European Property Ventures (Hertfordshire) Ltd (EPV) regarding the promotion of Barnes Lane, KLang021R.
 - EPV considers the local plan inappropriate and not in accordance with national policy, being overly reliant on windfall sites, and impacting the delivery of affordable housing and the affordability of housing more generally by reducing the quantum of planned development.
- The Chiltern Society welcomes reduced housing numbers but is concerned about affordable housing rates, water supply, sewerage, SANGs, sustainable transport, shortages of GPs, emergency healthcare provision, local school space, and traffic at peak times, alongside increased pressure from Hemel Garden Communities and its impact on quality of life, biodiversity and natural beauty.
 - The Chiltern Society is primarily concerned that housing numbers could be reduced further to 50% of the Standard Method, as in Three Rivers District.
 - Secondly, the Chiltern Society notes housing allocated close to the Chilterns AONB boundary, particularly Hemel Garden Communities, and believes that the resulting harm to the AONB would be too extensive to be mitigated.
- Community Action Dacorum (CAD) emphasises the importance of access to community provision and believe in greater emphasis on building community spaces in the Local Plan (noting only one current clear example).
 - CAD approves of the proposed level of affordable housing, but requests sustainable integrated travel solutions to reduce unsustainable rates of car usage and parking.
 - CAD also prioritises accessibility for disabled and older people to access shops and community facilities, alongside walking and cycling provision.
- The Council for the Protection of Rural England (CPRE) has significant concerns about the quantity of Green Belt allocated for development, that high levels of growth stick too close to Standard Method figures, insufficient consideration of brownfield-sites, Hemel Garden Communities and its impact on the Chilterns AONB, affordable housing, weak environmental protections, the Chiltern Beechwoods SAC exclusion zone and SANG, water supply and chalk streams, and waste water management.
 - CPRE points to paragraph 11, footnote 7 of the NPPF regarding the allocation of housing in protected land and the use of out-of-date data.
 - CPRE casts doubt on the label of “sustainable development” to describe the plan, particularly regarding requirements of the Environment Act 2021.

- CPRE notes the Chalk Stream Restoration Strategy 2021's findings that the Gade chalk river has 48% of recharge capacity removed from its aquifer for the public water supply, compared to 32% for the Ver, 28% for the Bulbourne, while 10% is the target figure for sustainable abstraction.
 - CPRE calls for an explicit SANG policy, requiring a new onsite SANG for each new greenfield development over 50 dwellings and reachable by foot.
- The Dacorum Environmental Forum (DEF) calls for fewer homes per annum, guided by the Borough's needs, with all development on the Gade Valley to be prohibited and greenfield development on plateau land to be minimal.
 - DEF calls for extensive, managed wildlife corridors to link all areas of Natural Green Space.
 - DEF calls for a net-zero and sustainable transport strategy in place of the Sustainability Appraisal.
 - DEF notes a lack of improvement works to alleviate traffic congestion and improve air quality.
 - DEF notes no strategy for increasing domestic water supply and alleviating existing strain on aquifers.
 - DEF takes issue with the use of the Standard Method for housing targets.
 - DEF supports the reduction of housing allocations in the market towns of Berkhamsted and Tring but objects to its reallocation to Hemel Hempstead.
- Dacorum Sports Network (DSN) notes the lack of an Infrastructure Delivery Plan (IDP) accompanying the consultation document while current facilities cannot supply increased demand due to lack of space.
 - DSN proposes sports hubs as allocations within the IDP as more sustainable than ad hoc football pitch and play space provision in new developments, with specific plan for individual communities.
 - DSN notes sport-specific sites and opportunities for development in Hemel Hempstead, Tring and Berkhamsted (see below).
- DLP Planning Ltd represents Taylor Wimpey regarding the Bv01 site Grange Farm and believes there are no exceptional circumstances that justify undershooting the Standard Method, especially given unmet need in neighbouring areas.
 - TW notes that 36% of the claimed housing supply is reliant on unallocated and windfall sites. It says the risks of this reliance should be mitigated by consenting planning applications wherever possible.
 - TW notes that the Revised Strategy does not adequately identify or provide for the need for older persons' housing.
- Emery Planning on behalf of Keepmoat Homes objects to the revised strategy on the grounds that more houses are needed to meet the Borough's assessed housing need and that government guidance does not support such reduction in targets.

- Extinction Rebellion (XR) Tring calls for new developments to be carbon neutral throughout development, with passive house standards adopted and renewable energy promoted.
 - XR Tring expresses concerns regarding air quality in urban areas, biodiversity, health inequalities, climate change adaptation and mitigation, upcycling of resources, sustainable transport, and water pollution and supply.

- Tring & Berkhamsted Labour Party requests that social housing be built in the early stages of the plan period, at a rate of 80% and close to public transport and facilities.
 - T&BLP requests that social housing be close to public transport and facilities as residents of social housing are less likely to own car.
 - T&BLP notes that building far from public transport leads to more traffic, inconveniences older people, and causes social exclusion.
 - T&BLP desires carbon neutral, higher density, green construction with EV charging, and passive house standards.

- Extinction Rebellion (XR) Tring and T&BLP both state that if Green Belt is built on, over 50% should be designated for green infrastructure and/or SANG, with existing semi-natural ecosystems protected or expanded for Biodiversity Net Gain.
 - XR Tring and T&BLP request protections and expansions for natural habitats with new habitats to be created through rewilding and migratory corridors, such as a wildlife crossing over the A41 or an extension of the buffer woods alongside the A41.

- Fairfax Strategic Land (Hemel) Ltd makes several objections to the Local Plan and proposes a variety of changes to policies:
 - The Local Plan should cover the period 2023-2042.
 - Provision should be made for at least 19,323 dwellings during the plan period (2023 to 2042), at a minimum of 1,017 dwellings per annum.
 - The housing target should be based on a level (not stepped) trajectory.
 - Land west of Leighton Buzzard Road, Hemel Hempstead should be included as an allocation for approximately 390 dwellings and a 70-bed care home.

- GUCE and Transition Town Berkhamsted (TTB) welcome prominent mention in the Revised Strategy of climate change, sustainability and green issues.
 - GUCE and TTB support the overall reduction in new houses compared with the previous consultation, particularly in the Green Belt.
 - GUCE and TTB are concerned about housing to be built in the rural area outside Hemel Hempstead but would welcome it if it brings regeneration and improves the prospects of people living in Hemel Hempstead.
 - GUCE welcomes a greater emphasis on the prospects for community energy and network heating from renewable energy, for example the opportunity for community heating for the Range/CarpetRight site relating to Frogmore Paper Mill, and harnessing chalk aquifer boreholes in Kings Langley.

- GUCE and TTB consider it imperative that whole-life net-zero buildings is included as part of a Local Plan, particularly for affordable housing, with higher standards for insulation, heating, energy generation etc is needed, evidence is required for net-zero.
- GUCE and TTB note that the BRE (Building Research Establishment) has shown that the cost for purpose-designed zero carbon building is only 2% and only 5% for traditional designs, compared to 20% for retrofitting.
- The Hertfordshire Gardens Trust/The Gardens Trust state that settings of heritage assets must be considered before sites are finally allocated.
- Herts & Middlesex Wildlife Trust note that three of the retained or amended sites include Local Wildlife Sites (LWS) within their boundary, namely:
 - HH01/02: Varney's Wood
 - Bk01: Long Green
 - Tr01: Cow Lane Farm Meadows
- H&MWT notes several other sites located near or adjacent to an LWS, namely HH03/04, HH08, HH09, HH11, HH17, NEW2 and Bv01. Future development of all these sites should have regard to the wildlife value of the nearby LWS and ensure that they are enhanced, not harmed.
- Hightown Housing Association (HHA) believes the Local Plan should seek fully to meet the housing need, and particularly the full supply of affordable housing.
 - Hightown Housing Association stresses that local people on low incomes, who can only rent, must rely on homes within their local authority and so a supply of secure rented homes is vital.
 - Hightown Housing Association itself notes signs of historic undersupply in the Borough: tight qualifying criteria, full registers, homelessness, falling rates of homeownership.
 - Hightown Housing Association notes from the SA that many rejected sites are in sustainable locations and identifies the main housing supply constraint as recreational pressure on the Chiltern Beechwoods SAC.
 - Hightown Housing Association commends smart alternatives to the traditional formula-based approach to SANG, as a less constraining way to protect Ashridge.
 - Hightown Housing Association state that the Revised Strategy should fully meet housing need.
 - Hightown Housing Association also suggest the use of the Grand Union Canal as a SANG site.
- The Home Builders Federation (HBF) considers the revised strategy unsound and unjustified in the context of local housing need and the housing crisis.
 - The HBF believes the Council has not properly assessed the impact of not meeting housing needs and thus shortfall will see affordability and the supply

of affordable housing continue to worsen, and more people living in overcrowded or substandard accommodation.

- The HBF notes that higher growth scenarios will have a much more positive effect on biodiversity in the long term compared to the Council's preferred approach, thus outweighing negative impacts.
 - The HBF believes location in the AONB is insufficient cause to dismiss sites.
 - The HBF expects the Council to meet housing need regardless of public opinion.
 - The HBF proposes extending the plan period to at least 2042 to ensure that its policies look ahead for at least 15 years (paragraph 22 of the NPPF).
 - The HBF points to paragraph 69 of the NPPF, that the LPA should deliver 10% of its housing requirement on sites of one hectare or less that the local plan or brownfield register have identified, and thus not form part of the windfall supply.
- Icen Projects represents Millbank Land, seeking to bring forward residential development at land at Bulbourne Park, Tring, and in strong disagreement with the changes made to the Local Plan, stating that removal of previously considered deliverable sites, strongly indicates that the Council cannot demonstrate the exceptional circumstances required to meet more of its housing needs.
 - Millbank Land states that the standard method for calculating housing need should be the starting point for the Council to meet its housing needs.
 - Millbank Land notes no clear and evidenced justification for the Council's departure from the standard method nor any exceptional circumstances.
 - Millbank Land notes no consideration for the borough's unmet needs in the wider housing market area close to London.
 - Millbank Land believe redistribution to Hemel Hempstead will see its housing market saturated and unable to cater for all housing needs.
- J&J Design notes that its client, New Gospel Hall Trust, has a current need to identify an additional site for a new place of worship and anticipate the need for a further site in the Borough within the LP period to 2038. The Trust do not sub-let their halls for other secular activities, including any social or recreational uses.
 - NGH Trustees agree that growth must be proportionate with infrastructure but are concerned to ensure that there is an adequate supply of new housing, including for families, to provide for the needs of existing and future residents of the Borough.
 - NGH Trustees note that high-density and high-rise flats concentrated around transport hubs risk creating future problem areas and are not appropriate for families and the elderly.
 - NGH Trustees note the importance of social, recreational and cultural facilities needed by both existing and proposed new communities as set out in NPPF (2023) paragraphs 92 and 93, including places of worship and other community facilities.

- Les West planning promotes Bk07 (Lockfield, Northchurch), on behalf of CALA Homes Ltd.
 - CALA considers the revised plan contrary to national guidance in the NPPF.
 - CALA takes issue with the reliance on un-evidenced windfall figures.
 - CALA believes the Council has a duty to satisfy the calculated needs, regardless of public opinion or objections, and should have gone to Regulation 19 following the 2020 consultation.
 - CALA believes the reduction of housing targets will not stand up to scrutiny.
 - CALA is surprised to see no information on a proposed trajectory of housing delivery over the plan period.

- McLoughlin Planning on behalf of DB Land & Planning Consultancy objects to the revised strategy, particularly the lowered housing requirement.
 - DBLP would prefer for the implications of this reduction in housing numbers to have been laid out in a housing table within the document.
 - DBLP notes that the Standard Method should be a minimum figure for housing, and thus considers the proposed reduction contrary to national guidance and neither a justified strategy, nor positively prepared.
 - DBLP notes that the Cabinet Report presented to members on 17th October 2023 stated that the Council at that stage lacked evidence to justify taking an alternative to the standard method figure.
 - DBLP does not consider the Council to have considered national guidance on AONB and Green Belt properly in citing them as reasons for a lower target, noting that AONB does not prevent development and that Green Belt should be reviewed and re-evaluated.

- Montagu Evans, on behalf of Angle Property (RLP Rectory Farm) LLP, who have an interest in KL02, considers the Revised Strategy unsound for several reasons.
 - Angle Property considers the Revised Strategy to fall substantially short of the Objectively Assessed Housing Need (OAHN) requirement for Dacorum, without providing sufficient justification to demonstrate why the Council cannot achieve this, nor an updated Green Belt Review that supersedes the findings of the version used both to form the evidence base of the Emerging Strategy and as the basis for the deletion of site allocations in the Revised Strategy.
 - Angle Property notes that the Revised Strategy is significantly reliant on Windfall sites, leaving it at risk of falling further behind the OAHN target.
 - Angle Property recommends a lower windfall allowance and a greater number of site allocations to ensure housing delivery is genuinely plan-led.
 - Angle Property considers the focusing of housing delivery in existing urban areas likely to skew housing mix towards one- and two-bedroom homes within higher density development, which is likely to be exacerbated by the removal of draft allocations from the Green Belt, which could deliver more and larger, family-sized housing to meet local need.

- Angle Property believe the Council should therefore revisit opportunities for allocating additional suitable land (such as at KL02).
- MSC Planning Associates Ltd considers the reduction in housing numbers as down to public opinion primarily and partly due to pressures of large sites' requirements for SANGs for which there is no strategy.
 - MSC notes most allocations seeming to come from existing assets and the reuse of buildings, whereas long-term land will be required for expansion.
 - MSC supports upgrading rail facilities and access and suggests compulsory purchase of the surrounding site to facilitate comprehensive development.
- The National Trust supports the revised proposals for housing delivery and amendments made to allocations in order to protect the Chilterns Area of Outstanding Natural Beauty, The European Protected habitats at Ashridge and the Green Belt. The National Trust note that it is important that appropriate policies are included in the Local Plan to address and mitigate the recreational impacts of new development on the Chilterns Beechwoods SAC (including land owned by the National Trust). In particular, the requirements for Gateway sites should be set out.
- Nexus Planning is promoting Bk05 (Blegberry Gardens, Shootersway) for reallocation on behalf of Crest Nicholson Partnerships and Strategic Land.
 - Based on the Sustainability Appraisal, Crest Nicholson suspects the decision to undershoot the target was pre-decided and not based on evidence and testing of higher targets.
 - Crest Nicholson notes that as the uncapped housing requirement is even higher than the Standard Method the current plan will not address affordability, while the house price/earnings ratio is currently 13.86 (the 14th highest in England outside of London).
 - Crest Nicholson worries that the plan may be found unsound if other LPAs do not agree to take on the unmet need.
 - Crest Nicholson cites the risks of increased homelessness if affordability is not addressed, as well as impacts on Council Tax revenues.
- North East Hertfordshire Swift Group and the Swifts Local Network: Swifts & Planning Group request a policy that requires one integrated swift brick and one integrated bat brick for any new dwelling or development built.
 - The Swifts Local Network notes that most Local Plans approaching adoption now include such a requirement (e.g. the London Borough of Tower Hamlets, Richmond-upon-Thames, and Wiltshire).
 - They note that the NPPG Natural Environment 2019 states the benefit to wildlife of swift bricks, bat boxes and hedgehog highways. The government has also confirmed in their March 2023 Biodiversity Net Gain (BNG) consultation response that "species features" such as swift bricks must be specified in addition to the national legal requirement for 10% BNG which does not include them.

- They note that existing nest sites for building-dependent species should also be protected where possible, and mitigation provided where lost.
- PJB Planning promotes Bk11 (Billets Lane) for Scarth Ltd as a sustainable brownfield development of 40 dwellings.
 - PJB Planning highlights concerns about the increase in windfall allowance and use of greenfield land. It references specific paragraphs of the NPPF that the Revised Strategy allegedly fails to address.
- Pegasus Group represents Taylor Wimpey in requesting Bk06 (Land East of Darr's Lane) be reallocated as a safeguarded or reserved site.
 - TW points out that 4000 respondents from the previous consultation only make up 2.6% of the Borough's population, many of whom would have vested interests.
 - TW believes that the plan period should cover 2026-2041 and increase the housing requirement.
- Phase 2 Planning on behalf of Gleeson Developments notes that the revised Local Plan seeks to reduce the number of new homes to below that suggested by the Standard Methodology based on public opinion rather than a coherent rationale.
 - P2P believes that achieving the Standard Method figure would not have significant adverse impacts on the Green Belt, as previous Green Belt studies identified significant parcels with only moderate Green Belt performance, whilst strongly performing parcels have pockets that could be released without significant impacts.
 - P2P notes that plan papers did not set out adverse impacts of a reduction in housing e.g. fewer homes available for local families, higher house prices, less provision of affordable housing, further pressure on rural services.
 - P2P consider the plan unsustainable by stifling land supply, adversely impacting health and prosperity of other settlements, and forcing people to live further afield from family, friends and jobs.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (HLM) objects to the new Local Plan for reducing housing growth below the standard method based on exceptional circumstances based on the Chilterns AONB and Green Belt but no demographic considerations, and it risks being found unsound.
 - HLM notes that the Council has not demonstrated a rolling Five-Year Housing Land Supply, and that the proposed supply, being reliant upon HGC and large tracts of urban land in active use, has a high risk of delay.
 - HLM argues that the location of Hemel Hempstead station supports further housing allocations on the west side of the town.
 - HLM does not consider brownfield sites identified as realistic regarding their current use value, attractiveness for non-housing or commercial use, viability for redevelopment as housing, and complex landownership.
 - HLM believes more land must be released from the Green Belt to assuage unreliable brownfield sites and to reach the standard method figure.

- HLM supports the decrease in housing provision at Berkhamsted and Tring.
- HLM considers reliance on the projected scale of windfall delivery unrealistic.
- Ryan & May on behalf of Redrow Homes Ltd (Harrow Estates Division) (Harrow) considers changes to the local plan unsound as not positively prepared, justified, effective, or consistent with national policy, while adjacent boroughs are unable to accommodate unmet need.
 - Harrow notes that the Council's evidence base demonstrates how it can meet in full the housing needs of Dacorum while balancing other strategic and environmental considerations.
 - Harrow cites the Council's evidence to argue development of scale on the edge of the Borough's major settlements, including Tring would enable timely delivery of community facilities and infrastructure and maximise affordable housing.
 - Harrow notes undue reliance upon high-density urban brownfield sites, including those with questionable viability and availability, and an unrealistic and not evidenced windfall allowance.
 - Harrow notes that evidence shows exceptional circumstances exist to justify releasing land from the Green Belt since there are insufficient sites within the urban area and not affected by major constraints.
 - Harrow object that evidence given at the Marshcroft (Land East of Tring) inquiry is not accurately reflected or fairly assessed, only reporting housing benefits resulting from development of the site, not the biodiversity net gain in excess of 35% and the wider socio-economic benefits to the Borough and local community estimated by the developer. The plan does not acknowledge the absence of any technical or environmental constraints to the delivery of the site, and incorrectly suggests in the SHLAA that access is constrained.
- Savills on behalf of Bellway Homes Ltd (North London) (Bellway) are very disappointed by the reduction of planned housing delivery below Standard Method.
 - Bellway notes no buffer in the proposed housing requirement to take into account an increase in minimum housing need over the duration of the plan nor to overcome potential deliverability issues with the identified sites, as required by the NPPF (paragraphs 74-75).
 - Bellway considers the quantum of proposed residential development under the Revised Strategy for Growth to be insufficient to meet the minimum housing need and in conflict with the NPPF.
 - Bellway believes the Local Plan should propose a greater amount of residential development in Dacorum and reduce its reliance on windfall.
 - Bellway supports focused growth in Hemel Hempstead but feel that the other settlements in the borough should deliver a higher proportion of the homes, particularly on brownfield or currently underutilised sites.
 - Bellway encouraged the Council to regularly review its proposed housing mix to ensure it reflects up-to-date housing need throughout the plan period.
 - Bellway does not believe the plan strategically addresses affordable housing.

- Bellway suggests that Policy DM2 be updated to allow the plan to consider financial viability assessments when assessing affordable housing obligation.
 - Bellway supports the approach set out in Policy DM20.
 - Bellway proposes amendments to Policy SP12 to allow for windfall residential development in rural areas.
- Savills representing Taylor Wimpey argues that allocated sites should have their housing potential optimised as much as possible to take into account constraints affecting much of the Borough's area and the higher housing requirement.
- Silversaw Ltd have instructed CBRE to comment on the importance of sufficient contingency built into the Local Plan to ensure that reliance on Hemel Hempstead does not compromise other objectives, that the plan 'be sufficiently flexible to adapt to rapid change' as in paragraph 11 of the NPPF.
- Stantec is representing Croudace Homes regarding Rossway Farm (Bk08).
 - Croudace doubts the efficacy of the consultation, noting that the changes to the plan are not fully supported by updated topic papers and assessments.
 - Croudace notes that the plan lacks a vision for the area and an overarching framework for the Borough as required by NPPF paragraphs 15 and 20.
 - Croudace recommends the plan period be extended to 2042.
- Thakeham Group are concerned that the lack of evidence used to justify the change to the growth strategy will result in the Plan being found unsound at Examination.
 - Thakeham is concerned about the reduction in planned housing below the Standard Method, and the significant reduction in affordable housing.
 - Thakeham questions the reduction of the plan period.
 - Thakeham objects that focussing most development in Hemel Hempstead is disproportionate and removes the choice of where to live.
 - Thakeham advocates for fairer distribution to support infrastructure.
 - Thakeham notes an updated transport study is needed to assess the suitability of the Hemel Hempstead strategy.
 - Thakeham calculates that over 4000 households across the plan period will fail to have their affordable housing need met. It also notes a shortfall of 711 dwellings compared to the 2013 Core Strategy.
- The Crown Estate, as majority landowner across the HGC programme area, confirm strong in-principle support for the Regulation 18 Local Plan 'Revised Strategy', but state that evidence to support the approach to deliver a lower housing target will be a key element in an Inspector finding the plan sound at Examination and welcome continued collaboration with the council.
- Tring and Berkhamsted Labour Party advocate for the prioritisation of social housing, its increase from 20% to 80% of allocations, prioritisation of brownfield over Green Belt and farmland, more building closer to bus and rail transport, greater commitment

and detail on environmental and infrastructure issues, and sustainability requirements for green construction to achieve net zero development.

- Turley on behalf of Ainscough Strategic Land (ASL) in relation to Land at the Former Marsworth Airfield ('Lukes Lane', LMar003R) does not believe the plan is fit for purpose, risking inappropriately significant harm to sustainability.
 - Turley notes that Local Housing Need should form the starting point for authorities in determining the minimum number of homes needed and developing strategic policies and does not consider the spatial constraints of the AONB and Green Belt unique, while there is no demographic basis for undershooting the LHN.
- Vincent and Gorbing on behalf of Berkeley Homes (East Thames) (BHET) make responses in relation to their site HH09 and believe that Local Housing Need should be met in full with greater urban capacity particularly at Hemel Hempstead.
 - BHET considers the increased reliance on windfall as risking the delivery of housing over the plan period and compound the increasing affordability issues and success of the plan in implementation.
 - BHET notes no analysis for SANG and is concerned as the strategy relies on maximising the number of homes delivered on previously developed land where there is no opportunity to provide on-site SANG.
 - Without SANG brought forth, BHET believes the Plan will be found fundamentally unsound as a proportion of its sites will not be deliverable.
- Wildlife & Countryside Link encourages the Council to be ambitious in implementing a biodiversity net gain target above the National minimum requirement of 10%, as several councils which have targets in place or emerging targets in Local Plans for 20% BNG or above.
- Woolf Bond Planning on behalf of Fairfax Strategic Land objects to the reduced level of housing provision, noting that the target should be based on a level trajectory in line with the Standard Method.
 - Fairfax states that the Local Plan should cover the period 2023 to 2042.
 - Fairfax advocates for Land west of Leighton Buzzard Road, Hemel Hempstead to be included as an allocation.

3.1.6 Wider Community

- Across the Borough there was large support for the reduction of housing targets, particularly in Tring, Northchurch and Kings Langley, with support for the removal of Rectory Farm and Land East of Tring. Many felt, however, that the reduction was insufficient, and supported an approach similar to Three Rivers District Council's.

- Many similarly felt that the transfer of more housing growth to Hemel Hempstead was sensible and sustainable.
- Meanwhile, many others felt that growth in Hemel Hempstead was now disproportionate especially in areas adjoining Apsley, Woodhall Farm, and Grovehill.
- Many were also concerned about St Albans City and District Council's plans to build to the east of Hemel Hempstead, particularly by Leverstock Green.
- Many supported the increased protection of the Green Belt and the Chilterns AONB provided by the reduced housing requirements, with some supporting more brown-field building and keen on regeneration of Hemel Hempstead town centre.
- Some others were concerned about the plans for more housing in the town centre, for a range of reasons, such as a perceived increase in troublesome residents.
- Some welcomed and supported the planned increase in the provision of social and affordable housing, while many others felt a target of 80% was more appropriate.
- Some mentioned concerns relating to examples of privately developed homes that had remained empty and had struggled to sell due to high costs.
- Many requested that more houses be built, rather than flats, with strong objections particularly to any planned high-rise development in the vicinity of Boxmoor and Hemel Hempstead Station.
- Some felt the plan was too weak on net zero and lacked a strong sustainability vision or requirements.
- Some requested greater support for electric vehicles such as charging points.
- Similarly, some stressed the Council's declaration of a climate emergency and the necessity of conserving the natural environment of the Borough.
- Some wished to see greater improvements to local walking and cycling infrastructure.
- Many expressed strong disagreements with the planned HGC expansion north of Hemel Hempstead for a range of reasons including traffic, flood risk, water strain on the Gade, impact on the heritage and character of Piccotts End, impact on the AONB and its setting, particularly in the Upper Gade Valley, the loss of valuable agricultural land, and its distance from the town centre and train station.
- Some called for all developments to be located close to existing public transport.

- Many expressed their objections to Bk01 (South of Berkhamsted) for similar reasons to those summarised below in the Berkhamsted section.
- Many expressed concerns about harm to the Green Belt, demanding that all brownfield sites possible be developed before greenfield, with empty buildings prioritised. Particular concerns were the loss of agricultural land, threats to biodiversity and wildlife, especially bats and birds, and urban sprawl affecting rural and village character.
- Some also expressed concern about the Chiltern Beechwoods SAC and the impact of greater visitors from new developments.
- Some felt that Biodiversity Net Gain offered inadequate protections and that more should be actively done to protect and enhance existing green spaces.
- The major concerns were to do with infrastructure, particularly regarding healthcare, Hemel Hempstead hospital, GP provision, dental care, education, parking (especially in town centres), air pollution, sewerage, and water pollution, particularly from sewage entering the canals and rivers.
- Particular concerns were voiced about the chalk streams of the Borough and the risks of their pollution and over-extraction for new developments.
- The largest concern regarded increased traffic across the Borough as a result of new developments, particularly within Hemel Hempstead, the Gade Valley, and Apsley (notably along London Road) and the resulting air and noise pollution.

2.4.9 Public Engagement

On 20th November, the Dacorum Climate Action Network annual conference was held at the Forum in Hemel Hempstead, attended by 95 internal and external attendees, with a Local Plan stall and officers present. Feedback received from attendees such as Sustainable Tring included:

- A requirement that solar panels and heat pumps be installed on all new developments.
- That, going forward, land in public ownership should be a priority for development.

3.2 Hemel Hempstead

- 3.2.1 Survey respondents had the option to select to which settlement area their response related. 562 responses (41.5%) selected Hemel Hempstead, of which 7 were postal responses.
- 3.2.2 Of these, 121 (21.6%) said they 'agreed' or 'somewhat agreed' with the proposal, while 403 (71.7%) 'disagreed' or 'somewhat disagreed' and 38 (6.7%) were neutral.
- 3.2.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Hemel Hempstead, their top five priorities were:
- | | |
|------------------------------------|-----------------|
| 1) Healthcare | – 145 – (25.8%) |
| 2) Green space and play facilities | – 126 – (22.4%) |
| 3) The road network | – 113 – (20.1%) |
| 4) Public transport | – 82 – (14.6%) |
| Education | – 82 – (14.6%) |
- 3.2.4 This ordering was not dissimilar from the survey's overall infrastructure priority results, apart from 'Education' which was slightly more prioritised regarding Hemel Hempstead relative to other settlements. Healthcare remains a clear priority.
- 3.2.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).
- 3.2.6 A number of comments have been received about Hemel Hempstead from the wider community. These have been separated into general responses and responses about key areas considered in the revised strategy.

Hemel Hempstead (whole town)

3.2.7 Specific Bodies

- Great Gaddesden Parish Council questions the ranking of Hemel Hempstead in the Sustainability Appraisal ranking for air quality, historic environment, and transport.
- The following services within Hertfordshire County Council made comments with regards to the revised strategy for Hemel Hempstead as a whole:
 - Transport services agreed that Hemel Hempstead provides greater opportunities for access to sustainable travel facilities. They stated the new allocations in Hemel Hempstead will require a robust evidence base for transport in Hemel Hempstead before the next stages of plan making.

- Lead Local Flood Authority notes that all sites must consider the SuDS hierarchy and should also conduct ground investigations including confirmation of groundwater levels and infiltration rates.
- Waste services confirm that the existing recycling facility at Eastman Way Hemel Hempstead has been recognised in the 'Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex (Updated 2022)' as too small to deal with current or future demand, and that the current facility's size significantly restricts the ability of vehicles to use the site effectively.
- Public Health services commented that new housing sites should be delivered in accordance with healthy places principles.
- Education (Mainstream) services noted that the Town Centre Hospital Site should be of a sufficient size to provide 3FE (three forms of entry) but required clarity as to deliverability of the site to give confidence that this can be brought forward at the right time. A further primary school site, capable of accommodating up to 2FE, is required in the Two Waters area to mitigate the level of development proposed across this area. The inclusion of two new secondary school sites in North Hemel is also supported, although it is currently deemed that these sites would only be required to accommodate 8FE each, as opposed to the 10FE sizes outlined in the consultation documents. Remaining potential future demand would be expected to be met through current and projected capacity and expansion of existing schools.
- Childcare services commented that nine new childcare provisions for 0-2 years should be provided to mitigate upcoming demand. For nursery (3-4 years), new provision will be made at new primary schools to meet demand for this service. To mitigate the new requirement for wraparound childcare for children aged 5-11 (required by September 2026), HCC will seek developer contributions towards resource costs, but confirm that additional facilities will not need to be provided.
- Adult Care Services state that, although a number of sites within Hemel Hempstead (aside from HH01 and NEW1 Riverside) are not large enough to meet the threshold for the inclusion of housing for older people or disabled people, the inclusion of this based on size alone will not meet the recognised need in the area, and provision should be considered on smaller sites.
- Services for Young People will seek to increase service provision in accordance with service priority themes. S106 or CIL will need to be made available to fund increased service capacity.
- Fire and Rescue services note the possibility that HCC may need to re-locate the fire station at Hemel Garden Communities and Two Waters in the long term to ensure 10-minute coverage across the HGC site.
- Library services are not looking to open any new library provision and confirm that increases in capacity would be sought by reconfiguring resources at Hemel Hempstead and increasing resources at Adeyfield and Leverstock Green. S106 or CIL will be needed to fund increase in resources at libraries within Hemel Hempstead.

- The Hertfordshire Local Enterprise Partnership and Hertfordshire Innovation Quarter believe there should be greater reference to Hemel Hempstead's strategic location by London, airports and the M1, within the new Local Plan.
 - HLEP and HIQ suggest the following changes to the Hemel Hempstead strategy:
 - Paragraph 2.3: a short description about what Garden Town status means, and the possible benefits or implications.
 - Paragraph 2.13: a short description of the emerging Maylands Masterplan and broadly what it entails.

- Nash Mills Parish Council (NMPC) notes that a large number of parish residents commute by train, and so are concerned about the number of cut services, the condition of the rolling stock, lack of carriages during busy periods, and potential safety risks associated with overcrowding.
 - NMPC also notes the major impact caused by development within Hemel Hempstead and question if Watford is the best location to focus hospital services, and so recommends Hemel Hempstead and St Albans Local Plans assess the impact of the current WHHT redevelopment proposal.
 - NMPC has concerns about the impact of building works, particularly in the Apsley area, which is already gridlocked at multiple times of the day, with no apparent mitigation or consideration of this in the plan.
 - NMPC fears traffic calming measures in the new proposed Kings Langley Local Plan may create a 'rat run' route through Nash Mills as the fastest alternative route from the M25 to central Hemel Hempstead, noting no measures currently in place or suggested to mitigate this.
 - NMPC welcomes an extension to Bunkers Park as part of SANG (Suitable Alternative Natural Green Space) but urges DBC to consider the increase in parking provision and width restrictions on Bunkers Lane necessary to mitigate any increased traffic.
 - NMPC notes the lack of A&E provision and limited Urgent Care provision.
 - NMPC questions how existing water supplies will sustain the level of development suggested for Dacorum, Three Rivers and St Albans Districts, alongside concerns regarding potential flooding and rainwater run-off.
 - NMPC notes no reference to Network House in the allocations in the plan.

- Nettleden with Potten End Parish Council disagrees with the use of the term 'Local Housing need' when the need is based on a national requirement and questions the ranking of Hemel Hempstead and HGC in the Sustainability Appraisal.

- NHS Herts & West Essex Integrated Care Board will seek a financial contribution towards the relocation of Grovehill Medical Centre.

3.2.8 General Bodies/Other Organisations

- Armstrong Rigg on behalf of Barratt David Wilson Trading Ltd and Taylor Wimpey UK Ltd object to the plan and request HH21 West Hemel Hempstead's reallocation.

- Bidwells on behalf of Felden Park Farms, the owners of HH16, supports its proposed allocation for employment and is willing to resubmit background evidence, in order that it be identified as “Retained” and not “under review”.
- Bidwells on behalf of Vistry Group and Crest Nicholson regarding land south of Red Lion Lane, Nash Mills, advocates for its reallocation and objects to the Council’s findings that the site is at a higher risk of surface water flooding, instead citing an Environment Agency study stating that the site is at low risk. It is argued that the neighbouring Local Wildlife Site and Abbots Hill Park would not be impacted by development.
- British Driving Society and British Horse Society state that interventions recommended within the Rights of Way Improvement plan should be implemented within the new Local Plan, and that all new active travel routes proposed by new developments should automatically become bridleways or preferably restricted byways linking to the existing public right of way network.
- The Box Moor Trust promote four areas for Suitable Alternative Natural Greenspace (SANG):
 - Bovingdon Brickworks (16.85ha) SAN – noting that this wildlife site has lots of scenic beauty and the Trust consider a SANG would enhance the user appearance and accessibility at the site and keep new footfall off rare vegetation. This is considered regarding the proposed allocation at Bv01 adjacent to the site.
 - Sheethanger Common and Bury Wood (27.22ha) SANG- stating that there is currently not an obvious circular route at this time, however the area should be considered if the Westbrook Hay SANG is successful.
 - Roughdown Common (10.05ha) SANG – although the response notes that initial routes were not considered long enough by Natural England, and that the Trust will review this at a later date.
 - Westbrook Hay (63.2ha) SANG – currently under discussion with the Council.
- They also continue to promote three areas for housing development.
- Claremont Planning, representing Landhold Capital on behalf of European Property Ventures (Hertfordshire) Ltd, is concerned about the reduced housing requirement and the lack of a five-year housing land supply and considers the plan unsound.
 - EPV requests that the plan reflect the updated NPPF regarding Green Belt releases.
 - EPV condemns reliance on windfall sites as against national policy expectations that the development be plan-led.
 - EPV states that the Council has failed to promote a comprehensive SANG strategy to assist in meeting both current and future housing requirements.
 - EPV notes the high unaffordability of properties in Dacorum is noted, and thus encourages housebuilding encouraged to increase supply.

- EPV believes the Council should revisit the safeguarding of land for development.
- Define Planning & Design Ltd on behalf of Bloor Homes supports the recognition of Hemel Hempstead as the most sustainable settlement in the Borough.
 - Bloor Homes suggests that the plan period be extended.
 - Bloor Homes states the importance that housing supply in the plan period is maximised, especially in the context of the national housing crisis and the acute affordability issues within the area.
 - Bloor Homes have also identified land for potential use as SANG, stating that it can meet the relevant requirements:
 - it comprises agricultural land / woodland / other natural spaces which has the potential to be converted into high quality public open space;
 - it is capable of delivering a 2.4-kilometre circular walking route that does not cross itself;
 - it is by its location and character very 'natural' in its feel, with limited built development (i.e. housing or other buildings) visible from within the land; and
 - it can be secured for a period of at least 80 years.
- Dacorum Sports Network (DSN) proposes several sport-specific opportunities:
 - Athletics: DSN proposes the relocation of Jarmans Park to a new site in HGC, potentially as a high-quality multi-sport facility.
 - Baseball: DSN proposes the expansion of Herts Baseball Club into adjacent HGC land.
 - Multi-sports centres: DSN proposes a large sports hall with a large swimming pool and gym space to make up for a shortage in Hemel Hempstead.
- Geraint John Planning on Behalf of Cityheart Ltd, in conjunction with London & Continental Railways and Network Rail, suggest that an increased reliance on allocations, as opposed to windfall, should be favoured, whilst evidence suggests that existing planning permissions have not been built out to their full extent.
- GUCE would welcome new housing if it brings regeneration and improved prospects for residents, as well as more emphasis on the provision for community energy and network heating from renewable sources and whole life net-zero buildings.
- Lansdown comments in relation to their promoted site Chaulden Lane (Rural 115L) and notes that the increased expected delivery of dwellings on brownfield and urban sites within one town suggests the plan risks failing to plan appropriately for a suitable mix of dwellings, including family housing.
- McLoughlin Planning on behalf of DB Land & Planning objects to the increase in housing at Hemel Hempstead and argues that this would compromise the ability of settlements elsewhere to expand and grow, impede the maintenance of local

facilities and services through managed growth, and reduce the supply and availability of housing in a mixture of locations.

- Nexus Planning on behalf of Crest Nicholson wonders if the Hemel Hempstead housing market can handle the allocated 82% of housing.
 - Based on Lichfields' Start-to-Finish Report, Crest Nicholson does not believe planning permission and construction of all buildings on these strategic sites can be completed by the end of the plan period.
 - Crest Nicholson also doubts whether windfall is correctly estimated, noting that windfall in Hemel Hempstead alone would make up 15% of the entire planned requirement. As most brownfield is permissioned or allocated, it considers it unlikely that high rates of windfall can be maintained.

- Phase 2 Planning on behalf of Gleeson Developments state that significant dependence on Hemel Hempstead to deliver the majority of new development (c.80%) is not sustainable.
 - Gleeson believes this strategy will deprive other settlements of affordable housing and economic benefits, and limit choice and access for those seeking homes outside Hemel Hempstead.
 - Gleeson raises concerns regarding deliverability as concentration of housing in Hemel Hempstead will see competition for the same market.
 - Gleeson raises potential impacts on the health and prosperity of other settlements, and on travel patterns if people are forced to live further from existing family, friends, and jobs.

- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) supports the focus on Hemel Hempstead in principle, but stresses that allocations must be deliverable.
 - HLM believe there is a strong argument for further housing allocations on the west side of Hemel Hempstead to capitalise on its greater rail accessibility.

- Thakeham Group objects that focussing most development in Hemel Hempstead is disproportionate and removes the choice of where to live.
 - Thakeham notes an updated transport study is needed to assess the suitability of the Hemel Hempstead strategy.

- Transition Town Berkhamsted would welcome new Green Belt housing in Hemel Hempstead if it brings with it regeneration and improves residents' prospects.

- Vincent and Goring on behalf of Berkeley Homes (East Thames) or BHET make responses in relation to their site HH09:
 - BHET supports the greater focus on Hemel Hempstead as the most sustainable location within the Borough and believes maximising urban capacity could play a greater role in delivering the proposed development.

- Woolf Bond Planning on behalf of Fairfax Strategic Land considers the proposed strategy for Hemel Hempstead unjustified, regarding delivery and need for affordable homes, and inconsistent with national policy for not boosting housing delivery.
 - Fairfax notes no reference to the impact of sites where redevelopment is only feasible once existing occupiers have vacated or been provided with alternative accommodation, re sites HH11, HH13, HH17, NEW1 and NEW2.
 - Fairfax notes several sites where it is essential that the existing activities are retained on or very close to the existing site HH03 and HH08.
 - Fairfax notes the existing value of brownfield sites will impinge upon their ability to address affordable housing needs, with reference to the viability case submitted regarding the National Grid site.
 - Fairfax asks the Council to be realistic in its expectations for delivery, especially where dependent upon others for delivery on infrastructure, particularly regarding HH01.

3.2.9 Wider Community

- The most common theme raised by the community was healthcare facilities.
 - Most responses simply referred to the lack of service provision on the current hospital, stating that the levels of new growth should be considered by the NHS when assessing need for future facilities.
 - Some raised questions on the proposed allocation HH03 Hospital (current allocation MU1), regarding the level of service provision and whether this would meet the levels of demand, particularly if so much of the land was to be allocated for homes. Responses also cast doubt on funding for development.
 - Most comments regarding the new proposal affecting site HH05 Market Square proposed an arts, cultural and leisure space instead, or the reinstatement of the historic market, rather than a health campus.
 - Other responses questioned the proposal's value for money and the impact on the Water Gardens. One comment suggested retaining the NCP Car Park site (HH07) to serve the proposed health campus.
 - Lastly, several individuals questioned the level of service provision feasible on this site and requested clarification on the definition of a 'health campus'.
- The wider community's next greatest concern was the impact of high levels of housing growth on existing traffic and congestion levels in Hemel Hempstead.
- Among general infrastructure concerns, comments particularly focused on the provision of education, as well as access to dentists, GP appointments, emergency services, and the provision of utilities.
- Several respondents raised questions on why development has been deleted from Berkhamsted, Tring and Kings Langley, with some advocating that a more proportionate approach should be employed across the Borough.

- Concerns were raised about loss of access to the countryside, public open space and wildlife.
- Concerns were raised regarding provision of affordable, particularly social housing.
- Comments were raised that too many high-rise buildings and flats were built instead of family homes.
- Comments were also made regarding availability of parking and road capacity.

Hemel Garden Communities (HH01)

3.2.10 Specific Bodies

- The Canal & River Trust makes general reference to Hemel Garden Communities within their response, stating that development of this scale would likely result in an increase in the use of the canal and towpath.
 - C&RT states that Hemel Garden Communities should recognise the benefits of access to the canal and actively look for ways to increase and improve upon these, such as improvements to the towpath to develop it as a more sustainable transport route, while supporting provision for water-based recreation and improved access to facilities.
 - C&RT also specifically references site HH01, regarding mitigation and improvement to the towpath via S106 or CIL, and that this should be specifically referenced within the site-specific requirements.
- The Chilterns Conservation Board believes Hemel Garden Communities (HH01 and HH02) requires greater work and that its increase by 1,000 dwellings presents potential problems to both the setting of the AONB and the delivery of the higher number, alongside the delivery of a high-yielding SANG.
 - CCB notes that a large part of the northern boundary of HH01/02 falls within the setting of the AONB with greater work required to resolve these issues.
- The Environment Agency makes the following comments on site HH01:
 - HH01 is located upon the Ver water body, which is currently significantly impacted by pollution from urban surface water run-off. Proposals for this site must prevent further deterioration of this water body or its associated elements, by mitigating potential increase in surface water run-off.
 - Infiltration drainage, deep or shallow, likely poses a high risk to groundwater. Therefore, SuDS proposals may require a permit.
 - The Household Waste Recycling Centre must be outside of Source Protection Zone 1 to be in line with Groundwater protection positions.
 - Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality.

- The following services within Hertfordshire County Council made comments with regards to site HH01:
 - Historic Environment services note that HH01 would likely require a pre-determination desk-based assessment, geophysical survey, trial trench evaluation, with Historic Environment input on any masterplan.
 - Lead Local Flood Authority notes that the site is well-suited to above-ground SuDS, with discharge restricted to runoff rates and volumes, while a source control approach should be followed. It is noted that multiple medium-high risk surface water flow paths cross the site.
 - The Waste Disposal Authority welcomes the continued provision of safeguarded land within the North Hemel Growth Area for a recycling centre and state that S106 or CIL will need to be made available to fund this.
 - Education (Mainstream) confirms that based on the revised growth scenario, two of the four 3FE (three forms of entry) primary schools at North Hemel should be master planned within the first phase. The inclusion of two new secondary school sites in North Hemel is also supported, but at this time it is deemed that these sites would only be required to accommodate 8FE each.
 - Early Years services state five new childcare provisions (ages 0-2) will be needed on site, including provision beyond the plan period, with new nursery provision (ages 3-4) at new primary schools on the site.
 - Adult Care Services recommends the inclusion of either three extra-care settings comprising of 70-80 self-contained units in each facility or one larger mixed tenure Integrated Retirement Community, and two 70-80 bed nursing home and 8 supported living units for people with disabilities on this site.

- Hertfordshire Local Enterprise Partnership and Herts Innovation Quarter state that the plan should include a description of what 'Garden Town Status' entails.

- Historic England states that a detailed Heritage Impact Assessment will be necessary prior to allocating site HH01 to confirm suitability, assess development capacity and establish criteria to mitigate harm. Historic England's recommendation is that effects of development are uncertain at this stage.
 - Historic England notes that HH01 is in the vicinity of two Scheduled Monuments and is located adjacent to the Piccotts End Conservation Area which includes one Grade I listed building, one Grade II* listed building, and five Grade II listed buildings.
 - Historic England strongly advises a master-planning exercise or Concept Framework prior to any planning application and recommends that work should be informed by and reflect the findings of the detailed Heritage Impact Assessment, and that this should be stipulated within planning policy.

- Little Gaddesden Parish Council raise a number of issues in relation to the impact of the Hemel Garden Communities proposal, including traffic, road capacity (particularly the B440 and the Water End bridge), loss of recreation space, damage to the

Ashridge protected site, damage to the Chilterns AONB, pressure on the water supply and the impact this will have on the chalk streams.

- Natural England make the following comments:
 - Natural England states that, where SANG has an additional function or dual purpose of protecting the Chilterns Landscape setting, further design will be necessary to maintain landscape integrity and its interest features.
 - A Visual Impact Assessment for the SANG sites will be expected to accompany this and Natural England welcome the opportunity to review the Landscape Visual Impact Assessment for North Hemel and provide further detailed landscape advice within their response.
 - Development within HH01 may adversely impact ancient woodland within its boundary, notably through recreational pressure. The Council should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on ancient woodland.
 - There should be additional clarification within the HGC position statement on page 32 of the Hemel Garden Community Position Statement to distinguish between SANG and SAMM.

- Nettleden with Potten End Parish Council notes inconsistent use of the term 'Hemel Garden Communities' across the consultation, referring to the development site HH01/02, to the “growth area” (the land both to the north and east of Hemel including that in SADC), and sometimes to the whole town.

- NHS Herts West Essex Integrated Care Board has requested early, on-site health provision be made in either North Hemel Hempstead or East Hemel Hempstead, otherwise North Hemel will significantly impact existing at-capacity practices.

- Redbourn Parish Council raises concerns regarding the Hemel Garden Communities development, particularly with regards to development on this site closing the gap between Redbourn and Hemel Hempstead.
 - RPS also raises concerns with the overall deliverability of the programme (referencing a draft trajectory published with the St Albans Regulation 18 consultation).
 - RPC also request that Redbourn Neighbourhood Plan be considered, particular with regards to design and the natural environment.

- Three Rivers District Council believe Hemel Garden Communities was justified as the focus for most growth in the 2020 growth strategy, and its ability to take on 10% growth in the revised plan is justified too, as it is a significant urban extension project with a greater range of planned facilities and services.

3.2.11 General Bodies/Other Organisations

- British Driving Society and British Horse Society believe there should be stronger protection of the remaining Green Belt outside of HH01 site area to prevent sprawl and protect the AONB.
 - BDS/BHS note that the proposed movement corridor will decrease ease of access to current rights of way.
 - BDS/BHS also note several existing quiet lanes within HH01 will be lost, so new and amended off-road routes for all vulnerable and equestrian road users will be required to provide ease of access to the rights of way network.

- Butterfly Conservation – Hertfordshire and Middlesex Branch notes that HH01 will require a full ecological survey before any designation is confirmed, as the site adjoins a Local Nature Reserve.
 - If development proceeds, the BC-H&MB request a green corridor linking to the local nature reserve, and expansion of the site itself.
 - BC-H&MB also note that due to the soil type on site HH01 there are opportunities to enhance habitats for local grassland species.

- The Council for the Protection of Rural England (CPRE) is primarily concerned about the promotion and expansion of HGC during and beyond the plan period.
 - CPRE considers the promotion of HGC by the Crown Estate, a public body, entirely inappropriate and contrary to Ministerial statements in favour of Green Belt and AONB maintenance.
 - CPRE notes serious concerns over transport, sewerage and water supply, particularly impacts on the Chiltern Beechwoods SAC and the River Gade chalk stream.
 - CPRE notes their recent study showing only 5% of housing built on Green Belt sites was “social housing”, less than planned in all cases. Meanwhile, it claims developers frequently revise downwards levels of affordable housing.

- The Dacorum Environmental Forum expresses strong concern at the development of Green Belt land and the threat posed by urban sprawl to unique character areas, biodiversity and wildlife sites, particularly in the Gade Valley.

- Dacorum Sports Network calls for a plan to take advantage of the scale of HGC and provide new sporting hubs in association with country parks and to fulfil open space and community centre requirements.

- Define Planning & Design Ltd on behalf of Bloor Homes Ltd welcome the commitment to the Hemel Garden Communities Project
 - The early delivery of Bloor’s land within HGC would facilitate delivery of key infrastructure and support further growth in the north of Hemel Hempstead.
 - Bloor Homes recommends that the local plan contain as much structure and detail as possible, to ensure early delivery of key elements of the scheme.

- Bloor Homes recommends a minor adjustment to the site requirements to refer to the delivery of “a minimum of 2,500 homes” during the plan period, with the remainder to be delivered beyond.
 - Bloor Homes states that some flexibility may be required in drawing the allocation boundary depending on other findings, particularly SANG.
- DLP Planning on behalf of Taylor Wimpey, McCarthy & Stone and Whiteacre Ltd comments that reliance on HH01 to meet the bulk of the Council’s housing need puts significant pressure on the remaining allocations to deliver early in the plan period.
- Herts & Middlesex Wildlife Trust note that Varney’s Wood, within HH01, is Ancient Woodland and is required to be retained within the site, recommending a buffer of at least 15m from the woodland in future planning for the site.
- James Holmes Planning Ltd supports the allocation of site HH01 and promotes an area of land known as ‘Land Adjacent to Oatfield House’ for residential development as part of the wider redevelopment of HGC.
 - As the site is self-contained, they believe it could be developed separately from the remainder of the strategic allocation, early in the plan period, and that this should be given very significant weight in considerations.
- Kitewood Estates Ltd agrees with the combined allocation approach for North Hemel and that more homes can be delivered within the Plan period up to 2040.
 - Kitewood states that their land is suitable and that its development in the short to medium term is achievable due to an absence of technical concerns.
 - Kitewood also states that whilst there are no availability issues with their land, the Council should continue to collaborate with landowners and developers.
 - Kitewood mentions that they control around 140 acres of land north of HH01 that can offer the flexibility required to deliver extensive SANG, with an additional 10 acres potentially suitable for development.
- Lansdown notes that although HH01 will produce a significant proportion of family homes, it is likely to face delivery issues due to the need to provide substantial infrastructure prior to development. This would delay the delivery of a suitable and balanced range of dwelling types and sizes that could instead be offset by including other smaller and medium sites in the short term.
- Leverstock Green Village Association (LGVA), regarding HH26, comments on the junction of Green Lane and Westwick Row being prone to flooding, exacerbated by the Kincup Avenue estate.
 - LGVA regards 80 developments as overdevelopment of the area and believes HH26 should be incorporated into HGC plans to retain green space.
 - LGVA notes that Westwick Row is narrow prefers access from Green Lane.
 - LGVA wishes for design to be sympathetic to the adjacent Oakwood Estate.

- The National Trust supports the focus of new housing deliver on a new garden community at Hemel Hempstead, noting the improvements this can deliver.
- Quod on behalf of Pigeon (Hemel Hempstead) Ltd welcomes the recognition of Hemel Hempstead's and HGC's significant role in delivering sustainable growth for the Borough, the removal from the Green Belt and Pigeon welcomes the Council's proposal to bring forward the delivery of homes on the site within the plan period.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) states that the delivery at HGC is highly uncertain.
 - HLM notes no delivery trajectory and believes the allocation has been increased without justification of how the additional units and required infrastructure can be delivered.
 - HLM notes no currently live planning application, although development at this scale would be expected to have a long lead in time for delivery.
 - HLM has assessed timescales and, assuming an outline planning application could be made in 2025, the first implementable housing could be expected in 2029-2030, with 2500 dwellings to be built in the remaining 10 years.
 - HLM expects that after the first year of production, each parcel within the allocation could deliver 35 dwellings per annum from each sales outlet, and so 7 sales outlets would be necessary.
 - HLM expects robust justification and a delivery trajectory if the increase in delivery of North Hemel is to be accepted, to show how the associated housing and supporting infrastructure can come forward concurrently.
- Strutt & Parker on behalf of the Gaddesden Trust makes a number of comments and suggestions regarding safeguarding and protecting the Chilterns AONB, stating that they do not object to the principal allocation, but state that appropriate landscape and heritage mitigation should be included within site specific policies.
 - Trustees are also promoting Land at Thrift Wood to the east of Leighton Buzzard Road as a potential SANG site with ancillary battery storage.
- The Crown Estate, as majority landowner across the HGC programme area, supports the full inclusion of HGC within the Plan period to 2040, recognising that this will facilitate its comprehensive planning, design and implementation with better alignment of the governing cross-boundary local plan policy framework.
 - The Crown Estate also supports the inclusion of site HH26 and suggests that it is allocated for development in the first five years of the plan period.
 - The Crown Estate writes on behalf of Pigeon Investment Management, Bloor Homes and Kitewood Estates to support the local plan, specifically HH01/02, with no strong view on the reduction of housing numbers but encouraging all efforts to ensure evidence is sound and robust.

3.2.12 Wider Community

- Responses directly referencing impacts on Piccotts End mainly raised issues of increased congestion, historic character, flooding, healthcare provision, chalk-streams and access to the countryside.
- Responses received referencing impacts on Woodhall Farm mainly raised concerns regarding provision of GPs, schools, and dental and hospital facilities.
 - Congestion was another key theme, with a lack of confidence that public transport and walking/cycling proposals would resolve these issues.
 - Responses also raised concerns about a loss of wildlife and access to countryside, and the impacts this would have on health and wellbeing.
 - A few comments referenced the distribution of development across the Borough and the impact of development on property values.
- Responses referencing Grovehill referred to hospital services, impacts on wildlife, health and wellbeing, congestion, GP provision, access to the countryside and the potential loss of allotments. Particular concern was raised regarding historic fluvial routes near Grovehill Playing fields and concerns about flooding in these areas.
- Responses from individuals in nearby rural settlements (Little Gaddesden, Great Gaddesden and Potten End) raised issues with the capacity of local roads (mainly the B440) and the bridge at Water End, impacts on congestion within the villages and on the Chiltern Beechwoods SAC and the AONB and their settlements' historic character, issues with water supply, and the impact of increased abstraction on chalk streams.
 - Several residents of Little Gaddesden proposed designating land to the south of Church Road, opposite the church and fields as protected open space.
- Several comments were raised by residents of Leverstock Green regarding the neighbouring site HH26 re issues of congestion, the impact of the proposals within the draft St Albans Local Plan, issues with access onto Green Lane (instead preferring access from Westwick Row), school capacity, the provision of public open space, and the design of new homes, expected to be in keeping with local character.
- A number of comments raised concerns with the HGC proposal as a whole. These comments mainly queried why housing within the St Albans local plan could be built close to Hemel Hempstead Borough as the infrastructure burden would fall on Dacorum, and why other towns in Dacorum have had growth reduced whilst Hemel has increased. These comments also referenced congestion, school provision, road capacity and hospital services, and the loss of agricultural land and countryside.
- A number of suggestions for provision on the site were made:
 - An outdoor sports centre and swimming pool.
 - Social value provision.

- Cycle routes between villages and the train station.
- New facilities for sports like padel and pickleball, both indoors and outdoors.
- A new larger and more sustainable rackets sports club venue.
- A network of green links to connect Fields End, Gadebridge Park, the Gade Valley, Howe Grove, and Margaret Lloyd Park, connecting Keens Fields via the Nickey Line and Cambrian Way, then connecting these via a replanted verge on Link Road back to Howe Grove via an improved Aycliffe Drive subway.

Two Waters Opportunity Area

3.2.13 Specific Bodies

- The Canal & River Trust raise a number of site-specific matters in relation to the Two Waters area, including that:
 - Sites HH08 and HH09 should be specifically required to provide mitigation and improvement to the towpath via Section 106 or CIL.
 - A S106 agreement (as previously agreed regarding a planning application for the site) would continue to be necessary for the development of HH10.
 - Improvements to the access to the canal & towpath, as for HH10, are required for the development of site HH11.
 - Public realm enhancement at Boxmoor Wharf would be welcomed, provided it fits the industrial heritage of the canal and former wharf use, and car parking remains available for access to the canal.
 - HH13 should provide adjacent towpath improvements to tie in works funded by adjacent S106.
 - For sites HH11 and HH13, opportunities for access points and water-based recreation facilities should be explored with C&RT and local sports groups.
 - For the development of site NEW2 to be acceptable, the towpath should be widened, resurfaced and its access and wayfinding improved.
 - C&RT states that, although it would be beneficial to include detailed considerations or site requirements for all allocations, the requirements for site NEW2 in particular should clearly set out the need to consider and mitigate impacts on the canal corridor, in terms of towpath use, ecological impacts, Biodiversity Net Gain, drainage, and structural integrity. Opportunities such as utilising the canal water for heating/cooling should be explored prior to a grant of planning permission.
- The Environment Agency makes the following comment on site NEW2:
 - The EA states that this site will require a Flood Risk Assessment and would require evidence to avoid adverse impact on the main river. Vulnerable development should be positioned away from the Gade/Grand Union Canal.
 - The EA notes that any development within 8 metres of a main river will require a Flood Risk Activity Permit from the Environment Agency.

- Development within 20m of the GUC will require mitigation to ensure the area's biodiversity is not impacted. For development within 10m of the river, Biodiversity Net Gain must be considered.
 - Any development should protect and enhance the chalk stream priority habitat and a WFD assessment will be required for any application.
 - This site is located in the Gade (from confluence with Bulbourne to Chess) water body, which is already impacted by pollution from urban surface water run-off. Any new development must ensure against further deterioration of this water body or its associated elements, by mitigating any potential increase in surface water run-off is mitigated against.
 - The EA states that development should install/plant buffer zones, to protect the rivers' associated elements from deterioration and to enhance mitigation.
 - The EA expects this development to deliver enhancements to its neighbouring stretch of river and the Council engages early with the EA on this.
 - Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to sites within the Two Waters Opportunity Area:
 - Transport services note that NEW2 has potential for highly sustainable transport development and should have a site-specific policy to ensure this. Proximity to the Air Quality Management Area means maximising uptake of sustainable modes and minimising car trips will be especially important.
 - Ecology services note that the site is adjacent to a local wildlife site and otters are recorded in the area, while bats may roost in the buildings. Any ecological appraisal should include an assessment of the site for otters and the Grand Union Canal should be protected from adverse ecological effects and increased artificial lighting, e.g. by buffering the north-east boundary with trees and shrubs to provide a contiguous green corridor with the adjacent habitats along the towpath and canal itself, alongside considering integrated bat and bird boxes within any new buildings.
 - Historic Environment services note that:
 - HH10 would likely require a conditioned trial trench evaluation.
 - HH11 would likely require a pre-determination heritage statement and desk based assessment.
 - HH13 would likely require a pre-determination desk-based assessment and paleo-environmental assessment re river deposits.
 - NEW2 is likely to require a conditioned watching brief.
 - Lead Local Flood Authority (SuDS) notes that above-ground SuDS should be used for large brownfield sites (HH09 and NEW2) and large greenfield sites (HH16) with discharge restricted to greenfield rates and volumes. For site HH08, above-ground SuDS should be used as far as practicable, and discharge restricted to greenfield runoff rates and volumes. For small brownfield sites such as HH10, discharge should be restricted as close as

possible to greenfield rates and volumes. If greenfield rates and volumes are not possible, significant betterment will be required.

- Lead Local Flood Authority (Flooding) notes that:
 - Site HH09 is at low risk of flooding, with one area of high risk on London Road on the northeast corner.
 - A large extent of HH11 Two Waters North is at flood risk from surface water and close to Flood Zone 2. LLFA notes that potential development would require significant mitigation, reducing development potential. LLFA strongly recommends that development, especially residential, is not located within Flood Zone 2 or areas at risk of surface water flooding.
 - Most of HH13 Frogmore Road is at medium-high risk of surface water flooding and close to Flood Zone 2, so LLFA is worried that potential development of this site would require a significant amount of flood mitigation which would likely reduce its development potential. The service recommend that any future applicants consult the LLFA and EA for pre-application regarding sites HH11 and HH13 considering the high flood risk on site.
 - The car park at NEW2 is at high risk of surface water flooding from surface water, with Flood Zone 2/3 at the north of the site.
- Education services note that a primary school site, capable of accommodating up to 2FE (two forms of entry) and compliant with HCC's land specification, is required in the Two Waters area to mitigate the level of development proposed across this area. Without a new primary school site, HCC would not be confident of being able to meet the yield arising from this area locally and could not support that part of the growth strategy.
- Historic England recommend a heritage impact assessment be undertaken for site HH11 as it adjoins four Grade II listed buildings and one Grade II* listed building. Historic England also advise a Heritage Impact Assessment for site NEW2 as it is near to several listed buildings and impact development could impact their setting.
- Kings Langley Parish Councils welcome the development of brownfield sites. However it raises serious concerns regarding development along the A4251 corridor between Hemel Hempstead and the Apsley Mills Retail Park, due to traffic, potential pollution, and infrastructure capacity and delivery.
 - KLPC also notes the lack of public open space available within the area and raises concerns on the recreational impact on the Moors.
- Nash Mills Parish Council raise concerns regarding the impact of development in Apsley, which may be exacerbated by provisions in the adopted Kings Langley Neighbourhood plan to introduce traffic calming measures, leading to a 'rat run' through the parish for a faster alternative route to the M25.
 - NMPC raises recent issues with water supply and concerns with regards to flooding and adequate run off provision.

- Lastly, NMPC notes no reference to the Apsley Two development in the plan.
- Natural England make the following comments:
 - Natural England requires consultation on sites HH08, HH09, HH10, HH11, HH16, NEW1 and NEW2 as these sites fall within the Impact Risk Zone (IRZ) for Roughdown Common SSSI in order to assess impacts and the provision of mitigation measures if required.
 - Natural England also states that sites HH08, HH09, HH11 and HH16 have PHI deciduous woodland either on or adjacent to the proposed site.
 - Natural England expects strong adherence to policy NEB5 and implementation of pollution prevention measures for sites HH11 and NEW2 as these have a primary chalk stream along the red line boundary.
 - Natural England notes that development within HH16 has potential to adversely impact ancient woodland within its boundary, in particular through recreational pressure. The Council should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate.
 - *Natural England states that site HH11 is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB)⁵.*
- NHS Hertfordshire West Essex Integrated Care Board (NHS HWE ICB) notes that the planned 1,950 new homes will significantly impact local GP services, particularly Lincoln House and Bennetts End, and so would like to reserve an option for a new on-site health facility within the Two Waters Opportunity Area.

3.2.14 General Bodies/Other Organisations

- Bidwells is representing Felden Park Farms, the owners of HH16, supporting the proposed allocation for employment and willing to resubmit background evidence again, in order that HH16 be identified as “Retained” and not “under review”.
- The Box Moor Trust submitted responses to the call for sites process:
 - The Trust object to the deletion of HH12 from the plan. They note that their original application for a land transfer was rejected by DEFRA. However, it believes that when another opportunity for a land exchange plot becomes available (which could be at any time) they have capacity to fast track an exchange application.

⁵ Please note additional clarifications from Natural England are being sought by officers with regards to this.

- The Trust also promote the site 'Friend at Hand', whilst noting that the site is below the usual accepted size for sites, however the Trust state that this could provide dwellings suitable for on-site agricultural workers, and (subject to discussions with a neighbour) a new access to the estate's headquarters.
- Boyer Planning on behalf of W Lamb Ltd promote their site 'Land at Shendish Manor', and state that:
 - The Council should seek to meet the objectively identified Local Housing Need for the Borough using the Standard Method.
 - The Land at Shendish Manor, Apsley, is not subject to any absolute constraints to development.
 - The Land at Shendish Manor is sustainably located within the main town Hemel Hempstead and is well-placed to deliver new homes with associated infrastructure and community facilities.
 - The site can deliver a 2FE Primary School which would support the Council's regeneration objectives in the Two Waters Opportunity Area.
 - Utilising land that is within the control of the site promoter a bespoke SANG solution can be provided outside of the site boundary.
 - Agreement has been reached in principle with an adjoining landowner to the west, to accommodate the provision of an additional vehicular access to the site via Shearwater Road (in addition to improving London Road). There are also further secondary vehicular access points and a number of public footpaths on the site.
- Carter Jonas on behalf of Apsley Developments Ltd states that in order to reduce acute affordability concerns within the Borough, it is critical that housing supply is boosted, with future provision on the edges of settlements, like Shendish Manor and Fairfields, on the edge of Hemel Hempstead, to accommodate access to jobs and sustainable travel, where provision can occur over the short to medium term.
- Geraint John Planning on behalf of Cityheart Ltd regarding HH08 Station Gateway makes representations in conjunction with the landowners of the site London and Continental Railways and Network Rail, anticipating that pre-application discussions on their site will take place in 2024.
 - Cityheart Ltd believes the site is suitable for higher densities of between 460 and 530 units and heights up to 14 storeys.
 - Cityheart Ltd believes site uses should be led by demand for floorspace.
 - Cityheart Ltd supports regeneration of the station and car park through consolidation of existing facilities and provision of a multi-storey car park.
- GUCE specifically mentions the potential opportunity for community heating for site NEW2 Apsley Mills Retail Park, relating to Frogmore Paper Mill, and harnessing chalk aquifer boreholes in Kings Langley.

- MSC Planning believes a comprehensive strategy for the Two Waters Gateway is necessary, to remove and upgrade the range of disconnected shops in the locality.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) notes a lack of clarity whether Network Rail and London Continental Railways have selected a development partner for site HH08.
 - HLM notes planning permission for a 16-storey tower on site HH10 has now lapsed (4/03441/15/MFA), with viability of development at this scale on a contaminated site is questionable.
 - HLM notes HH11 remains in active use with five separate landownerships and a number of occupiers, and no evidence that this has passed the sequential test.
 - Allocation of Site NEW2 is unfathomable as the retail park is in active use.
- Royal London Asset Management have written in support of the Two Waters Opportunity Area and the allocation of Apsley Mills Retail Park, noting that the site, with fairly conservative height, could deliver c.550 residential dwellings. They wish to see the TWOA have high density growth aspirations to protect greenfield.
- Vincent and Gorbing on behalf of Berkeley Homes (East Thames) (BHET) promotes their site HH09 and considers that the allocation should be increased to 490 dwellings and notes that imposing a 30% affordable housing on the Hemel Hempstead Gasworks site would prevent the site coming forward.

3.2.15 Wider Community

- Most comments regarding the Two Waters Opportunity Area came from Boxmoor.
 - Comments primarily reference some proposals' building heights, with concerns that these would be out of character with the surrounding moors.
 - Another concern was the impact of further densification on congestion.
 - Other respondents stated that there was an overprovision of flats in the area and there should be more family homes.
 - Some were concerned with levels of healthcare and education provision.
- Several comments were raised regarding the impacts on Apsley.
 - The main concerns raised were congestion and associated air pollution.
 - This was closely followed by concerns on the lack of education and healthcare (mostly GP) provision and a lack of parking in the area.
 - Specific comments were also raised with regards to Roughdown Common SSSI and the impact on wildlife in this area.
- Several residents raised concerns on Kings Langley, mainly referring to congestion and air quality, infrastructure provision, and a lack of public open space within the

area as a whole and within brownfield developments.

- A number of comments were raised regarding impacts on road capacity in Hemel Hempstead, healthcare provision (hospital), and local schools. Several residents also expressed disappointment at the loss of well-used retail space.
- Lastly comments from across Hemel Hempstead, and from Apsley, Boxmoor and Nash Mills in particular, were made about rail capacity, noting that currently some services are overcrowded with too few coaches or irregular services at peak times.
- It was suggested during the call for sites to retained site HH16 (currently under review) as open space, as they border with Roughdown Common SSSI and should be managed as an extension of this area. However, another resident stated that this area should be used for housing as opposed to development near Red Lion Lane, as it is closer to stations.

Hemel Hempstead Town Centre

3.2.16 Specific Bodies

- The Environment Agency made the following comments on site NEW1:
 - This site would require a Flood Risk Assessment and evidence to ensure no adverse impact occurs to the River Gade, away from which vulnerable development should be sequentially positioned.
 - Any development within 8 metres of the River Gade will require a Flood Risk Activity Permit from the Environment Agency.
 - If this development is within 20m of the river, riparian zone management will be required to support the Water Framework Directive (WFD).
 - The EA notes that other mitigation measures may be required as the overshadowing of this area by tall rise buildings impacts the biodiversity of the site, and the natural function of the river is heavily modified.
 - Development should protect and enhance the chalk stream priority habitat.
 - Submission of a WFD assessment will be required as part of any application.
 - Development must not contribute to any further deterioration of the River Gade or its associated elements.
 - This development should either maintain or improve existing rates of surface run-off from the site, lest it becomes a source of pollution to the water body.
 - The EA would encourage any development to install planting buffer zones, to protect the rivers from deterioration and enhance existing mitigation.
 - Due to proximity of the River Gade, the EA expect development to provide for ecological surveys, to create a picture of the watercourse's ecological status, and identify how development will mitigate against deterioration.
 - The EA expect this development to enhance its neighbouring stretch of river and recommend early engagement with the EA to facilitate this.

- Proposals should include appropriate risk assessments and not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to sites within the town centre:
 - Transport services state that clarification/evidence will be required to support the expansion of the car park on the NEW1 site. The site is potentially very sustainable, despite constraints to walking and cycling accessibility that the site will need to overcome, notably the route to Hemel Station.
 - Ecology services note that the River Gade and associated riparian habitats run through the NEW1 site and should be protected from adverse ecological impacts and increased artificial lighting. The potential for roosting bats in buildings is noted, if suitable roosting features are present. Site requirements should consider enhancement measures for the river and its margins.
 - Historic Environment services note that:
 - HH03 would likely require a pre-determination desk-based assessment.
 - HH06 would likely require a conditioned strip, map, and record.
 - NEW1 would likely require a pre-determination desk-based assessment and paleo-environmental assessment re river deposits.
 - Lead Local Flood Authority (SuDS) notes that sites HH03 and HH04 are large brownfield sites, well-suited to above-ground SuDS if restricted to greenfield runoff rates and volumes. For sites HH05, HH06 and HH07, above-ground SuDS should be used as far as practicable, with discharge at greenfield runoff rates and volumes.
 - Lead Local Flood Authority (Flooding) note that:
 - HH03 has several small areas of mid-high surface water flood risk.
 - HH04 has a significant high-risk surface water flow path crossing the south of the site from the west before ponding in Orchid Drive. Managing and attenuating this flow path may be difficult.
 - HH05 has a low risk of surface water on site apart from the eastern and western boundaries.
 - HH06 has a mostly low risk of surface water on site, with small areas of medium-high risk on the north, west and southeast edges of the site. Flood Zones 2 and 3 are on the western edge.
 - NEW1 contains large areas of high surface water flood risk to the west and east and contains a recorded flood incident. The surface water will require significant mitigation. The River Gade flows through the site and has an associated area of Flood Zone 2/3.
 - Adult Care services recommend the inclusion of one extra-care setting comprising of 70-80 self-contained units at site NEW1.
- Historic England state in their response that any aspirations to 'maximise building height' within the town centre must be balanced against the New Town's design.

- Historic England strongly recommend that the Council undertake a tall buildings study for the town centre to ensure that densification and high-rise development respects and does not harm the historic environment.
- Historic England comments in relation to specific town centre sites:
 - Historic England object in principle to allocation of HH05 Market Square and strongly advise that HH05 should be deleted, stating that the market square forms an important part of the setting of the Grade II Registered Water Gardens, representing the correlation and juxtaposition of hard and soft public open spaces, while the Market Square itself is an important part of the New Town's urban design. Historic England prefer use of the site as enhanced public realm enlivened by active frontages and supporting greater public use.
 - Historic England recommends a Heritage Impact Assessment for site HH06 as it is near the Grade II Registered Water Gardens, adjacent to one Grade II* listed building and four Grade II listed buildings.
 - Historic England also recommend a Heritage Impact Assessment for site HH07 as it contains the Grade II listed 'Rowland Emett Mosaic' and is immediately adjacent to the Grade II Registered Water Gardens. Redevelopment of this site would necessitate the removal and relocation of the Rowland Emett Mosaic, which would require listed building consent.
- Nash Mills Parish Council believe the proposals for a town centre hospital would not resolve current issues of traffic and poor public transport access.
- Natural England make the following comments:
 - Natural England note that site HH03 has PHI deciduous woodland either on or adjacent to the proposed site.
 - Natural England expect strong adherence to policy NEB5 and pollution prevention measures for site NEW1 as it contains a primary chalk river.
- NHS Hertfordshire West Essex Integrated Care Board (NHS HWE ICB) notes that the planned 1,750 new homes will significantly impact the sole local GP service, Fernville Surgery, and so would like to reserve an option for a new on-site health facility within the Town Centre Opportunity Area, either as a branch surgery or by relocating Fernville Surgery to a larger site.
 - NHS HWE ICB supports the allocation of HH03 for 450 dwellings and requests the boundary is revisited to include the northern field of Paradise Fields to allow the accommodation of primary school provision.
 - NHS HWE ICB is committed to collaborate with the Council in exploring the viability and securing the delivery of an Integrated Health Campus at HH05 Market Square, to expand healthcare services and improve the vitality of the town.

3.2.17 General Bodies/ Other Organisations

- AViD (Arts Venue in Dacorum) request that HH05 Market Square be earmarked as an arts venue to support regeneration of the town centre, else Hemel Hempstead may become the largest urban area in Hertfordshire yet lack an arts venue. AVID note that their campaign, when initiated in 2016, was backed by a petition of c.3000 signatures and attach this as evidence to support their response.
- The Council for the Protection of Rural England (CPRE) supports a more imaginative and innovative regeneration of the town centre to reduce pressure on open countryside and accommodate small households and new business.
- The Dacorum Environmental Forum notes a lack of proposals to rejuvenate the town centre and suggests that HH05 Market Square be retained for cultural and social use to aid regeneration and reduce out-of-town traffic for leisure purposes.
- DLP Planning on behalf of Taylor Wimpey, McCarthy & Stone and Whiteacre Ltd comments that the Council should ensure town centre sites meet deliverability tests if they are included within the 5YHLS.
- DSBG HH Riverside Ltd wishes to reaffirm the availability and suitability of the Riverside Shopping Centre site, stating that Riverside presents significant opportunities to redevelop and improve the existing asset and public realm, whilst ensuring that existing commercial uses and their benefits remain.
- Hertfordshire Gardens Trust states that site NEW1 Riverside has the potential to harm the setting of the Water Gardens, and so the type of development, its height and massing should take the setting of the Water Gardens into account.
- MSC Planning believes the Town Centre approach will not work without a comprehensive master plan and control of corresponding assets.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) comments that the deliverability of site HH03 is linked to a new hospital hub, however there is no clear timescale regarding site availability, while the healthcare campus would only be delivered late in the Plan period.
 - HLM also comments that site NEW1 is unfathomable, as the site is intensively developed and actively used for hotel, retail and leisure uses.
- CBRE on behalf of Silversaw notes that town centre regeneration sites can be complicated, and it will potentially be unviable to bring forward policy-compliant levels of affordable housing. Therefore, reliance on town centre regeneration sites is considered a risky cornerstone for a delivery strategy.

3.2.18 Wider Community

- Most comments on the town centre noted the decline of retail in the area.
- Some agreed with redevelopment to reflect changes in shopping habits, while others supported the use of unused retail space to be used for housing.
- Others disagreed with the proposed loss of retail, services and parking at NEW 1 Riverside to make way for housing, stating that this would cause further decline.
- Several respondents agreed that HH05 Market Square should be allocated as an arts venue / leisure space due to its attractive location and community history.
- Some comments referred to the proposed health campus, announced separately to this consultation, and felt that:
 - The Market Square would be forever lost, and the health campus would not enliven the town.
 - The existing hospital should be upgraded instead.
 - The square is too small to accommodate the required level of provision.
 - The role of a new health campus was unclear and confusing.
- Some expected a high level of private sector investment to support town centre leisure and nightlife options to accompany residential conversions.
- One respondent was concerned that the town centre would need more facilities for children in the area to support a growing residential population, such as low-cost entertainment or another adventure playground.
- Some stated that the town centre should be made more affordable to allow small businesses to trade and referred to rents being too high.
- Some suggested that the town centre pedestrianisation be reversed, but others suggested that, in areas of high density, shared spaces between pedestrians and vehicles are hazardous.
- A number of suggestions were made by the wider community, including:
 - Exploring international best practice for town centre densification, to serve as a hub to support the surrounding neighbourhoods.
 - Introducing sustainable transport connections such as bike schemes, scooters and an easy hop-on bus route.
 - Creating a purpose-built bus and taxi hub.
 - Having a dedicated drop-off/pick-up space.
 - Providing more seating, public toilets, lighting and security cameras.

- Establishing a Dacorum museum in the town centre.
- A significant proportion of suggestions related to site HH05 Market Square, in addition to allocating it as an arts venue, including:
 - Using the area for community events, weekly markets, and various specialist markets, such as vintage/antiques, farmers produce, plants, etc., and potentially working in partnership with the Sunnyside Rural Trust.
 - Developing the perimeter of the square with 2/3-storey apartments with ground-level activity and using the square as a green space.
 - Reinstating the large Christmas tree which previously featured.
 - Introducing greater controls on shops on the site to provide healthier food.

Maylands

3.2.19 Specific Bodies

- The Environment Agency comments regarding site HH18 that it is located on the Ver water body, which is already polluted from urban surface water run-off. Therefore, new development must mitigate against further deterioration of this water body and any proposals should include appropriate risk assessments and not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to site HH17 within the Maylands:
 - Historic Environment services note the site would likely require a conditioned watching brief.
 - Lead Local Flood Authority (SuDS) state that above-ground SuDS should be used as far as practicable with discharge restricted to greenfield rates and volumes.
 - Lead Local Flood Authority (Flooding) note the site is indicated to include moderate areas at high risk of flooding from surface water, which to mitigate additional attenuation volume may be required.
 - Hertfordshire County Council make detailed comments on site HH18, but this site already has resolution to grant planning permission.
- Hertfordshire Local Enterprise Partnership and Herts Innovation Quarter believe there should be greater reference to the Maylands Masterplan within the document.
- NHS HWE ICB notes the impact that development of Cupid Green Depot will have on several GP practices in the vicinity and will seek a financial contribution to either Grovehill Medical Centre relocation or any other premises' capacity improvement.

3.2.20 General/Other

- Quod, on behalf of Aviva Life and Pensions UK Limited, welcomes the continued protection of Maylands Business Park as an employment area.
- Roebuck Land and Planning Ltd on behalf of Hallam Land Management (SHLAA site 78, land north of Polehanger Lane) comments that allocation of site HH17 Cupid Green Depot would require relocation of the active refuse site.
 - HLM notes that the HGC position statement includes the provision of such facilities, but lacks clarity, timescales or an overall delivery strategy.

3.2.21 Wider community

- A specific comment was raised about the lack of consideration for parking for LGVs.
- Several respondents noted levels of congestion exiting Maylands onto the M1 motorway and the capacity of the junction.
- Several comments referred to unused space and employment buildings within the Maylands, stating that these should be used to meet the housing need, rather than building on Green Belt sites. Others complained that recent residential development within the Maylands have had a detrimental impact on traffic and pollution.
- Some responses welcomed the provision of additional employment at Maylands.

Other areas within Hemel Hempstead

3.2.22 Specific

- The Canal & River Trust notes that they were not consulted on the relevant planning application for the HH21 site, despite advising that the site would result in increased use of the towpath which would require mitigation.
- The Environment Agency comments regarding site HH22 that it is located by the River Gade which already has poor ecological status. This development must not contribute to any further deterioration of the river or its associated elements, none of which are currently significantly impacted by urban run-off. Therefore, surface run-off rates from this development should either be maintained or improved.
- The following services within Hertfordshire County Council made comments with regards to sites within the wider area of Hemel Hempstead:
 - Historic Environment services comment on site HH23 that it would likely require a pre-determination desk-based assessment, earthwork survey, geophysical survey, and trial trench evaluation, while site HH26 is likely to require a pre-determination trial trench evaluation.

- Lead Local Flood Authority (SuDS) notes that large greenfield sites (HH22, HH23) and large brownfield sites (Grovehill NDP) are well-suited to above-ground SuDS. For HH22 a source control approach should be used while for site HH26 above-ground SuDS must be used. Discharge for all sites must be restricted to greenfield rates and volumes.
- Lead Local Flood Authority (Flooding) notes that site HH22 has a high-risk surface water flow path crossing the site, while site HH26 is at low risk of flooding but Kingcup Way to the north is high-risk, where records exist of extensive property flooding from 2014 soon after it was developed.
 - The Grovehill NDP is overall at low risk of flooding although some areas of medium-high surface water risk should be managed.
- Historic England request that a Heritage Impact Assessment for site HH23 as it partially falls within the Hemel Hempstead Old Town Conservation Area and is immediately adjacent to a number of listed buildings.
- Nash Mills Parish Council welcomes an extension to Bunkers Park as part of SANG provision but urges DBC to consider that increased usage would exacerbate the need for parking provision and would like to request width restrictions on Bunkers Lane to mitigate the increased traffic.
- Natural England states that sites HH22 and HH23 are located within a proposed area of search considered as a possible boundary variation to the Chilterns AONB.

3.2.23 General/Other

- Butterfly Conservation – Hertfordshire and Middlesex Branch made detailed comments on a number of sites, referring primarily to the Strategic Housing Land Availability Assessment Update (2023):
 - Sites HH21 (LA3 – Permissioned) and HH22 (LA1-Retained) should include provisions for a green corridor, including provision for chalk grassland.
 - Site HH23 (LA2-Retained) will need special attention to assess its existing biodiversity prior to development proceeding.
 - The group’s detailed comments on a number of other sites not included within the Revised Strategy as proposed allocations (Hemel101R, Hemel102R, Hemel104R, Hemel110R and Hemel113R) are noted.
- Bidwells represents the landowner of Flamsteadbury Farm in Redbourn, a proposed allocation within the St Albans Local Plan, with small areas within Dacorum Borough, and requests their release from the Green Belt to assist in the delivery of housing.
- Lansdown makes several comments relating to the strategy and their site, Chaulden Lane (Rural 115L), objecting to the assessment of the strategic Green Belt parcel including this site, and submitting a supplementary transport note on site access.

- Planning Potential state that the Council's allocation for site HH27 requires updating, and that removal of the allocation, now a permissioned site, does not take into account that the site's southern portion remains vacant and should be reallocated.
 - Planning Potential represents a client with interest in the land and aware of market demand for uses outside of 'retail and leisure' envisaged for the site.
 - Planning Potential recommends that the allocation be amended or expanded to reflect market trends and consider a wider range of potential uses (e.g. small-scale retail, or alternative non-industrial employment uses).
- Progress Planning on behalf of Clovercourt (Sarratt) Ltd promotes their site 'Land at Shaffold Knoll Farm' as part of the Call for Sites, noting that the site is unconstrained by flood risk, heritage and landscape. The response notes that dwelling numbers and mix is a matter for future consideration.
- Roebuck Land and Planning Ltd, representing Hallam Land Management, promotes Site 78 (Polehanger Lane) on the basis of good sustainability performance and ability upon review to provide 16ha of on-site SANG with provision for an event space/cafe, land for biodiversity net gain enhancement adjacent to Halsey Field, a new primary school, a community square and transport hub, and new routes for all transport modes. RLP argues for more development to the west of Hemel Hempstead to capitalise on closer rail links, and states that assessment of their site within the updated evidence is inaccurate.
- Woolf Bond Planning on behalf of Fairfax Strategic Land objects to the omission of 'Land West of Leighton Buzzard Road' as a housing allocation, stating that the site would contribute towards housing need, including 40% affordable housing, in excess, £8 million of S106 contributions and £3 million of CIL contributions.

3.2.24 Wider Community

- Two comments were made about LA3 regarding transport concerns and anti-social behaviour from the traveller site.
- One comment stated that LA2 should be retained as public open space, with development focused within the town centre itself to assist to assist regeneration.
- Responses were raised about current neighbourhood centres within Hemel Hempstead requiring revitalisation, improved shops and community buildings, and improved transport links with the train station from Grovehill and Highfield.

3.2.25 In addition to this, several comments from the wider community mentioned the Hemel Hempstead strategy in passing while referring to Berkhamsted and/or Tring.

- Most generally supported providing less housing within the market towns of Berkhamsted and Tring, often referring to the benefits to Hemel Hempstead of further growth, such as more affordable housing and investment in infrastructure.
- The remaining responses disagreed with the increased focus on Hemel Hempstead, referencing the need for affordable housing in the Borough's villages.

3.3 Berkhamsted

3.3.1 Survey respondents had the option to select which settlement area their response related to. 488 responses (36%) selected Berkhamsted, of which 7 were postal responses.

3.3.2 Of these, 162 (33.2%) said they 'agreed' or 'somewhat agreed' with the proposal, while 311 (63.8%) 'disagreed' or 'somewhat disagreed' and 15 were neutral (3.1%).

3.3.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Berkhamsted, their top five priorities were:

- | | |
|------------------------------------|----------------|
| 1) Healthcare | – 96 – (19.7%) |
| 2) Green space and play facilities | – 80 – (16.4%) |
| 3) Community facilities | – 61 – (12.5%) |
| 4) The road network | – 59 – (12.1%) |
| 5) Education | – 58 – (11.9%) |

3.3.4 This ordering was not dissimilar from the survey's overall infrastructure priority results, apart from 'Community facilities and 'Education' which were slightly more prioritised regarding Berkhamsted. Healthcare remains a clear priority.

3.3.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.3.6 Specific Bodies

- Aldbury Parish Council welcomes the reduction in planned housing at Berkhamsted, for the sake of traffic and pressure on Ashridge.
- Berkhamsted Town Council believes it is premature to designate Green Belt land for construction before the building industry is ready and doubts the claim that 40% locally affordable housing will be provided as Berkhamsted is a high-cost area.
 - BTC notes a Master Plan will be required with upgrades to drainage, sewage treatment and water supply.
 - BTC doubts whether the planned 900 houses per annum can be achieved, as completions have rarely exceeded 600 dwellings a year since 2006, with windfall accounting for 60%.
 - BTC cites Minister for Housing and Planning, Brandon Lewis' June 2016 letter that "support of local people" should be requisite for Green Belt adjustments.
 - BTC request safeguards that development will meet the local housing needs, with appropriate infrastructure to integrate development of Bk01 into the town,

and biodiversity net gain. Reliance on windfall, by backland and garden infill, is considered to undermine the character of the area.

- BTC believes the policy of 40% affordable housing in a high-cost housing area is untenable, leaving Bk01 likely to fail as the development of its Green Belt would not be outweighed by the benefit to the community.
 - BTC believes Berkhamsted's infrastructure is not fit for purpose for current needs, let alone future housing.
 - BTC provides detailed specifications for what should be required of Bk01.
 - BTC approves of the increased distribution to Hemel Hempstead. Where Green Belt is to be released without meeting the Local Housing Need, residents will have reasonable justification to contest the policy.
 - The current affordability ratio is in excess of 13 (dwelling cost/household income), while over 30% of housing rental in the Town is excessive.
 - BTC cites the consultants' report for their Neighbourhood Plan, noting that 40% affordable housing will see only 340 affordable units over the plan period, while the report indicates local need as 40 affordable units a year.
 - BTC notes that, as Berkhamsted households are increasing in age with a marked decline in ages 25-34, with over 65s set to represent about 50% of the population by 2040, there should be an increase in the proportion of single and three-bedroom dwellings planned.
 - BTC states that hilltop flats in Bk01 should be restricted to two storeys.
 - BTC remains unconvinced why some smaller sites were deleted which could come forward for feasible delivery.
- The Chilterns Conservation Board acknowledges that Land south of Berkhamsted (BK01) sits away from the AONB on the north side of the town, but care is required.
 - Dacorum Councillor Lara Pringle enthusiastically supports the plan.
 - The following services within Hertfordshire County Council made comments with regards to the revised strategy for Berkhamsted:
 - Transport services noted that the 'package of infrastructure' outlined in the plan will need to be identified through the preparation of a suitable evidence base. Delivery of the required mitigations must be secured through policy.
 - Historic Environment services note Bk01 would likely require a pre-determination desk-based assessment (below ground). From an above-ground historic environment perspective, the site is within a Locally Registered Park and Garden and associated with the Grade II* Listed Ashlyns Hall. These concerns will need to be addressed.
 - Lead Local Flood Authority (SuDS) notes that Bk01 is well-suited to above-ground SuDS. Discharge must be restricted to greenfield rates and volumes.
 - Waste Services state that HCC plans to reconfigure and increase the number of containers at Berkhamsted recycling centre to increase capacity.
 - Education services calculate proposed development in Berkhamsted equates to approximately 2.95FE (forms of entry) of demand. The Bk01 school site is

only required to be 2FE, not 3FE. They would expect to meet the balance of potential future demand through school expansion, with the existing identified education zone adjacent to Bridgewater Primary School retained to enable expansion if required. At the secondary phase, future demand is assumed to be meetable within existing schools, and retention of the existing education zone may support the deliverability of an expansion scheme.

- Early Years services note new childcare (0-2 years) provision is required, with nursery 3-4 and wraparound childcare 5-11 to be met at primary schools.
 - Adult Care Services recommend the inclusion of one extra-care setting comprising of 70-80 self-contained units on this site.
 - Services for Young People will seek to increase services available to young people in accordance with their Service Priority Themes.
 - Library services would increase resources at Berkhamsted Library to increase capacity.
- Historic England notes all deletions and permissions and requests a Heritage Impact Assessment for site Bk01, given the proximity of Grade II and II* listed Ashlyns Hall.
 - Kings Langley Parish Council makes one reference to Berkhamsted, implying that one primary school is insufficient for a claimed 1,264 new dwellings.
 - Parul Dix of Northchurch Parish Council objects on the grounds of loss of natural green space, wildlife, the increased risk of flooding, limited GP services, school waiting lists, exclusion from secondary school catchment areas, additional traffic, exacerbated by frequent road closures between Northchurch and Berkhamsted.
 - Northchurch Parish Council as a whole supports the plan and states their approval for deletions in Tring and Berkhamsted which would have impacted Northchurch.
 - NPC welcomes all proposals to build new primary schools as well as the planned regeneration of Hemel Hempstead.
 - NPC describes traffic through Northchurch as too high and exacerbated by development.
 - NPC is liaising with the Environment Agency on the state of the chalk streams, particularly the River Bulbourne.
 - NPC stresses that Northchurch is not to be considered part of Berkhamsted.
 - Natural England make the following comments:
 - Natural England states that the allocation of site Bk01 is largely acceptable but notes that it includes deciduous/priority woodland habitat.
 - Natural England states that Bk01 is located within a proposed area of search which for a possible boundary variation to the Chilterns AONB.
 - NHS HWE ICB notes that Manor Street Surgery already operates in cramped conditions, and so would like to reserve an option for a new health facility at Bk01

and would seek a financial contribution to improve capacity at Manor Street Surgery.

- Three Rivers District Council note that reliance on Bk01 could mean losing some flexibility in housing supply in terms of the timing, spread and variety of sites, especially as the allocated site performs poorly concerning the Green Belt.

3.3.7 General Bodies/Other Organisations

- Adrian Cole FRICS Ltd states that the deletion of Shootersway sites will not remove the pressure for development, and that restricting growth to larger sites, such as Bk01, removes house buyers' choice for properties on smaller, more individual sites.
- Berkhamsted Schools Group proposes Haslam Field as a housing allocation, noting that its promotion of Haresfoot Campus for sports provision is dependent on Haslam Field's allocation for housing.
 - BSG criticises the focus on substantial longer-term sites, which may take years to obtain full permission and require substantial infrastructure provision, as adding to the short-term housing crisis.
 - BSG critiques the estimation of windfall sites and risks of town cramming, noting that Berkhamsted's windfall allowance is given as 275 homes, despite the Council acknowledging limited availability of vacant brownfield sites.
 - BSG considers political reasoning to lie behind the changes to the plan, which it believes could see the plan rejected at inquiry.
 - BSG rejects the use of SANG as a determining criterion for allocations.
 - BSG believes that Berkhamsted, the second largest town in the Borough, can accommodate more growth, to reduce pressure on Hemel Hempstead.
- Berkhamsted Castle Trust have promoted their concept of a 'People's Park', centred on Berkhamsted Castle and involving surrounding land east and north of the castle. The Trust have commissioned LUC for the purposes of assembling land and investigating potential status as a SANG/Gateway site.
- Berkhamsted Citizens Association somewhat agrees with the proposed plan and offered no comment.
- Berkhamsted Raiders approves of lower housing requirements but urgently requests additional 3G facilities to allow all-weather activities, as rain often cancels matches.
 - Berkhamsted Raiders requires independent facilities, as high costs, limited provision and their reliance on schools and community areas restrict their ability to serve children in the community.
- Bidwells on behalf of Vistry Group advocates for the reallocation of Pea Lane, Northchurch, to meet the housing supply shortfall, objecting to its exclusion on the grounds of lying entirely within the Chilterns AONB, arguing that it would have no

visual or physical impact on neighbouring settlements and would safeguard the wider countryside from further encroachment. Reallocation of Bk06, East of Darrs Lane, is also supported as part of comprehensive development of west Berkhamsted.

- Bidwells on behalf of Jarvis Homes object to the deletion of Edgeworth House from the plan and maintain that it could bring forward either a care home or market and affordable housing without undue harm to the Open Land designation or the heritage asset of Edgeworth House itself.
- Berkhamsted Residents Action Group (BRAG) strongly disagrees with the revised local plan and fully endorses CPRE's conclusions, taking issue with the Council's approach and instead supporting Three Rivers District Council's approach, not to comply with the Standard Method, while rejecting the inclusion of Bk01 in the plan.
 - BRAG believes the plan is not consistent with NPPF guidance by prioritising Green Belt development over brownfield in Berkhamsted, rejecting two previously included brownfield sites and allegedly disregarding previous inspectors' conclusions that Bk01 fulfils criteria for full Green Belt protection.
 - BRAG says Bk01 is misleadingly described as 'brownfield' and 'urban'.
 - BRAG says distance from Berkhamsted town centre and the site's topography, previously cited as reasons for exclusion from the plan, make it unsuitable, while its ridgetop location is visible from the Chilterns AONB.
 - BRAG is concerned for the impact on the Grade II* listed Ashlyns Hall, as well as implications for access up Swing Gate Lane which is steep and bookended by primary schools. BRAG believes the proposed Chesham Road to Swing Gate Lane connection would not be able to meet road standards.
 - BRAG argues that the site's topography makes sustainable transport expectations unrealistic, with no provision in the Sustainable Transport Plan for new such routes into town.
 - BRAG notes that Berkhamsted already suffers from poor air quality, which will be exacerbated without mitigation by the local plan, as will water pollution and detriment to sewage disposal and the water supply.
 - BRAG notes no additional GP or care provision, and that the need for a new school would better be served by a new secondary school in Northchurch.
 - BRAG admires the 40% affordable housing target but believes it will not be fulfilled by Taylor Wimpey and that house prices in the area render truly affordable housing almost impossible.
 - BRAG argues for more smaller homes to suit the aging demographic.
 - Lastly, BRAG takes issue with the consultation as insufficient.
- Berkhamsted Sports Grounds Charitable Association somewhat disagrees and notes a lack of additional planned provision of sports pitches.
- Bridgewater School Berkhamsted supports the revised plan.

- Butterfly Conservation – Hertfordshire and Middlesex Branch makes detailed comments on several sites.
 - The group notes that Bk01 includes a local wildlife site, which should be excluded from development. An ecological survey of the entire site should be undertaken to assess biodiversity and consider opportunities to enhance and expand the existing wildlife site.

- The Chiltern Society welcomes the reduction in planned housing in Berkhamsted but is concerned about infrastructure, especially healthcare, roads, and education.

- The Council for the Protection of Rural England (CPRE) is particularly concerned about the density of planned development in Berkhamsted (which it calculates at almost twice the proposed density for Hemel Hempstead, Bovingdon and Tring), the sensitive ridge-top location of Bk01, and further strain on infrastructure.

- Dacorum Heritage Trust made no comment but somewhat agreed with the plan.

- Dacorum Sports Network notes a lack of a sports solution for Berkhamsted and the removal of the Bulbourne Cross proposal which DSN previously supported. DSN calls for additional indoor sports halls and the expansion of gymnastics facilities.

- DHA Planning promotes Ivy House Lane (Berk026R) on behalf of Premier Property Acquisitions, as a solution to shorter-term housing provision on smaller sites.
 - DHA takes issue with the calculation for windfall development, arguing Berkhamsted has capacity within its urban boundary for another 275 homes.
 - DHA notes that Berk026R's site capacity is closer to 100 dwellings than the 129 mentioned in the SHLAA.
 - DHA argues that, despite bordering the AONB, the site makes no major contribution to its setting, and that its development would represent infill within existing boundaries and not compromise Green Belt integrity.
 - DHA notes that access can be provided by three potential entries, and so is less constrained than described in the SHLAA.

- DLP Planning Ltd represents Taylor Wimpey regarding the Bv01 site Grange Farm.
 - TW claims 1264 new homes are planned for Berkhamsted, which puts greater pressure on other allocations to deliver earlier, and so the Council should issue planning applications wherever and as soon as possible.

- GUCE welcomes mention of climate change, sustainability, and green issues, as well as the reduction of new houses in the Green Belt.
 - GUCE wants more emphasis on community energy, network heating and whole-life net-zero buildings, especially for affordable housing, at minimal cost increase.

- Herts & Middlesex Wildlife Trust note that the site requirements for Bk01 do not refer to the presence of a Local Wildlife Site within the site allocation. Development of the site must ensure that its wildlife value is enhanced, not damaged.
- Les West Planning promotes Bk07 (Lockfield, Northchurch) for reallocation, on behalf of CALA Homes Ltd.
 - CALA describes the SHLAA assessments of Bk07 as inaccurate and misleading, noting that Bk07 was first identified for development in 1998.
 - CALA notes that the site is outside the AONB, has no impact on the AONB in distant views, does not adjoin any other Green Belt part, is bounded strongly by the railway line, and was strongly recommended in the 2016 SHLAA.
 - CALA objects to the assertion that 23.9% of the site lies within the 500m SAC Exclusion Zone, arguing that the railway impedes walking distances.
 - CALA affirms that the site lies entirely within Flood Zone 1 up to the Canal banks, and thus it would be erroneous to claim serious flood risks.
- Landowners of Edgeworth House are in favour of the plan and its redistribution to Hemel Hempstead and away from other Green Belt sites, but they wish to see their site, Edgeworth House, no longer designated as Open Land and instead considered for housing. They object to undershooting the housing requirement and reliance on windfall sites, and particularly that all brownfield sites in Berkhamsted have been removed while one greenfield site remains.
- MSC Planning considers changes to the Berkhamsted strategy as entirely due to public opinion.
- Newsteer is promoting Bk09 (Bank Mill Lane) for reallocation in the Local Plan, on behalf of Angle and Land Developments, Signature Senior Lifestyle and Beechcroft Developments, as a much-needed care home and retirement complex.
 - Newsteer notes a major shortfall of over 1000 care bed spaces in the Borough by 2036 were identified in the SW Herts LHNA identifies.
 - Newsteer rejects concerns about impacts on traffic on Shootersway, as the site is located in the northeast of Berkhamsted.
 - Newsteer argues that the site would enable older people to downsize and thus free up many family homes in Berkhamsted.
 - Newsteer notes that by nature it will have no impact on school capacity.
- Nexus Planning is promoting Bk05 (Blegberry Gardens, Shootersway) for reallocation on behalf of Crest Nicholson Partnerships and Strategic Land.
 - Based on statements made in the Emerging Strategy, Crest Nicholson believes the Revised Strategy would fail to ensure necessary infrastructure or maintain the viability of Berkhamsted and its town centre.

- Pegasus Group represents Taylor Wimpey in requesting Bk06 (Land East of Darr's Lane) be reallocated as a safeguarded or reserved site.
 - TW notes that in 2020, the Council stated in the Emerging Plan that “no single constraint is severe enough to render the site [Bk06] unsuitable”.
 - TW states that the site would be unsuitable for a secondary school.
 - TW says it has undertaken detailed masterplanning to deal with the sensitivity of Grim's Ditch and views from the AONB, while providing its own SANG.

- Savills representing Taylor Wimpey supports the proposed allocation of Bk01, but wishes to see Bk04 reinstated, which would aid in reaching the housing target while retaining a green corridor buffering the A414.
 - TW considers Berkhamsted well placed to take on strategic responsibilities and meet development needs, having taken virtually no strategic planned housing growth for more than 20 years, while Hemel Hempstead is reaching saturation point.
 - Meanwhile, TW agrees that focusing development on Bk01 will help to control the impact of development on the rest of the town.

- Stantec is representing Croudace Homes regarding Rossway Farm (Bk08).
 - Croudace seeks to have its site reintroduced to the plan, so the plan can be found sound, as its inclusion cannot be considered 'disproportionate growth'.

- Swing Gate School Governors are concerned about the development of Bk01 due to current levels of congestion on Swing Gate Lane and the danger posed to children, which would be exacerbated by construction.
 - Governors consider southeast Berkhamsted as oversupplied with primary school places, while secondary school places at Ashlyns are under pressure.

- Thakeham Group promotes its site, Land East of Berkhamsted (Bulbourne Cross).
 - Thakeham argues that the plan lacks evidence for the reduction in housing in Berkhamsted.
 - Thakeham requests evidence for housing needs up to 2040 and proposes growth in Berkhamsted, Tring, and Bovington – including East Berkhamsted.
 - Thakeham argue that the allocation of growth to Hemel Hempstead is disproportionate, while Berkhamsted receives only one site.

- The Tring & Berkhamsted Labour Party consider Bk01 unsuitable for transportation and that a new road will be needed while a bus service is unlikely to work and traffic emissions pose a risk to schoolchildren on Swing Gate Lane.
 - T&BLP notes that the current proposal threatens Long Green woodland, the Long Green/Sugar Lane byway, and Gardenfield Lane bridle path.
 - T&BLP suggests a wildlife overpass across the A41, with forest extension to reduce air and sound pollution.

- T&BLP doubts the completion of on-site primary school and community facilities.
- Warner Planning on behalf of Griggs Homes believes all brownfield sites, including Haresfoot Farm, should be used.
 - Griggs welcomes the recognition of Berkhamsted's suitability for sustainable growth and the increased windfall potential but believes that Berkhamsted's windfall opportunities are underestimated.
 - Griggs would welcome the allocation of Haresfoot Campus as Cy04.
- The BFI does not wish for its site in Berkhamsted to be deleted from the local plan.
 - The BFI states that it is unsustainable for them to retain the site.
 - The BFI notes that the site is not greenfield, makes minimal contribution to the Green Belt, and that heritage impacts are mitigable, thus being the only site in Berkhamsted with limited or no constraints in the SHLAA.
- PJB Planning promotes Bk11 (Billets Lane) for Scarth Ltd as a sustainable brownfield development of 40 dwellings.
 - PJB Planning questions the deletion of Site Bk11 without a clear justification.
 - PJB Planning also supports retaining Site Cy01 for various reasons, including making more brownfield commercial sites available for housing.

3.3.8 Wider Community

- A large number of public responses were received from Berkhamsted, particularly objecting to the South of Berkhamsted allocation (Bk01).
- Many, particularly in Northchurch and along Shootersway, were happy to see planned development reduced in those areas and other Green Belt sites.
- Others felt that the planned growth was disproportionate, representing an increase of over 10%, especially if concentrated in one part of town.
- Some suggested reducing the housing in Bk01 and spreading it over smaller brownfield sites in Berkhamsted or planning more housing in Hemel Hempstead.
- Many objected to the planned development of greenfield, with no brownfield sites allocated, and specified for reallocation many brownfield sites proposed in 2020.
- Bk01 in particular was described as a sensitive site both for the Chilterns AONB and for the Chiltern Beechwoods SAC, highly visible from across the valley and on the approach to Berkhamsted, as well as being valuable arable land.
- Other factors cited in opposition to Bk01 were:

- Access: the site is located up Swing Gate Lane, which is steep and thus impedes access on foot and by bike. Meanwhile, the presence of two schools (Swing Gate and Thomas Coram) at either end was noted for increasing foot and car traffic along it, with on-road parking a further impediment.
 - Safety: many concerns were raised that cars travel already too fast on Swing Gate Lane within Upper Hall Park, posing a serious risk to schoolchildren.
 - Education: many felt no need for a third primary school in the area, and feared Ashlyns School would be overloaded and shrink its catchment further.
 - Distance: many felt the site's location 2km from the town centre was a further impediment to non-car travel and would prevent the new development from integrating into Berkhamsted proper, while doubting that new on-site facilities would divert journeys to the town centre.
 - Developer: several objected to Taylor Wimpey in particular, citing doubts about affordable housing fulfilment previously at Bearroc Park, Shootersway.
 - Some believed that the new houses would not sell, particularly to locals.
 - Heritage: several expressed concern about the impact of the development on the Grade II* listed Ashlyns Hall.
 - Green space: many felt that Berkhamsted needs more green spaces and more protection for its existing green space, so objected to a greenfield site.
- The greatest concerns were raised regarding infrastructure, particularly regarding:
 - Healthcare: many reported they were unable to access GPs, dentists, or a nearby hospital, as well as social care for older residents.
 - Education: many felt that Northchurch and Shootersway were in much greater need of a new school and that Ashlyns School was already at capacity, with no current need for a new primary school.
 - Parking: several expressed concern at their current difficulties in finding parking in the town centre.
 - Public transport: several expressed concern about public transport, particularly that the bus service needed improvement and the rail station and trains would be overloaded.
 - Traffic: by far the largest concern, many reported traffic along the High Street, and the two primary proposed access routes to Bk01, Chesham Road and Swing Gate Lane. Several felt that a proposed link road from Chesham Road had been made impossible by the Ashlyns Grove development.
 - Flooding and drainage: many expressed concerns that building on greenfield would exacerbate flooding issues, with flooding and overflowing sewage reported on London Road between Swing Gate Lane and Cedar Road.
 - Several expressed a desire that all new homes be built to high sustainability standards and include thermal heat pumps.
 - Several also stressed that the water table and aquifers were already at their limit, with concerns about the River Bulbourne and Grand Union Canal.

- Many expressed concerns at the impact of development on local wildlife, particularly the mature woodland between the south of the site Bk01 and the A41, described by several as a “green lung” protecting the settlement from air and noise pollution, as well as being home to diverse and endangered wildlife such as skylarks.
- Many expressed concerns at the prospect of increased pollution in Berkhamsted, particularly air pollution from car traffic, as well as pollution of the chalk streams by sewage, and noise pollution from cars and construction.
 - Many mentioned the reported 3770 hours of sewage released into the river by Thames Water at Bulbeggars and voiced concerns about water pollution.
- Some expressed desire and need for a new sports and leisure centre in the town.
- Many strongly expressed their desire for more social housing and truly affordable housing, with guaranteed delivery, noting that developers had previously paid contributions in place of fulfilling the agreed quota.
- Many voiced with the consultation, particularly feeling that there had been insufficient publicity, a poor choice of timing in the busy lead-up to Christmas, that the survey had been difficult to respond to, and that it had not fulfilled the statutory requirements of a full consultation.
- Many respondents wrote in specifically to note their support for the response by Berkhamsted Residents Action Group (BRAG) as well as the CPRE, with a group of respondents from Ashlyn’s Grove also expressing their objections.
- Many claimed that the Council and the Inspector of the 2013 Core Strategy had previously rejected development of the Bk01 site for many of the above reasons and expressed confusion at the apparent reversal of this decision.
- During the Call for Sites, one resident proposed the council consider land south of the A41 near Berkhamsted. Another resident re-promoted draft allocations Bk09, Bk11 and Bk13 which were proposed to be deleted.

3.3.9 Public Engagement

On 30th November, Council officers attended an event coordinated by SWAN Youth Project in Ashlyns School, Berkhamsted, including ten students from the school, providing a presentation of the plan, with a focus on allocation Bk01 South of Berkhamsted, and recording feedback from the students.

- Students suggested that the proposed community centre to be built on Bk01 contain a games room and community library, with café facilities, health clinic and mental health support particularly for younger people and loneliness support for older people.

- They suggested that the developer could work with local charities to staff and operate the centre, and engage young people as volunteers.
- They suggested the developer fund apprenticeships in building work, library management, animal care and park management.
- They suggested it function as a multi-generational centre, with creches and daycare for toddlers and babies in the morning, space for young adults to study and gather in the afternoon, and as a venue for older people in the evening.
- Students suggested that services and facilities, such as chemists, supermarkets and cornershops, should be provided locally in the community centre and ground floor of the focal buildings, to encourage walking and reduce traffic.
- Students requested that the site and its amenities be funded by the developer for several decades.
- Students emphasised the importance of cycling, with the provision of safe off-road secondary cycle routes.
- Students requested additional local bus provision, as well as free bus transport for older people from Bk01 to the town centre.
- Students stressed the value and importance of greenery and countryside to the character of Berkhamsted.
 - They were keen that the SANG for Bk01 should have a small, accessible and non-concreted carpark primarily for disabled visitors, with bike racks, cycling facilitated on site, and ramps.
 - They were keen to preserve the greenery and woodland of Bk01 and avoid the loss of habitats, suggesting that new wildlife areas be allocated and proposing an animal sanctuary for endangered species and young people to volunteer at, potentially supplementing the one veterinarian in Berkhamsted.
 - Students wanted more parks and secluded open spaces with benches.
 - Students were concerned about flooding and keen for the site Bk01 to include SuDS and ponds, noting that the canal is unclean and unpleasant.
 - Students proposed foresting the area around the proposed ponds or replacing some ponds with proposed park areas to support the dogwalkers and joggers who currently use the site.
- Students suggested that housing should be affordable for locals and avoid becoming a commuter town with new peripheral communities not integrated with locals.
 - Students noted the limited carpark at Berkhamsted Station and were concerned that the distance of the site from the station would lead commuters to drive into town and worsen air pollution.
- Students noted interested in a new secondary school to serve Berkhamsted, particularly in Northchurch, noting that Ashlyns School was also oversubscribed, leading students often to be left out
 - Students suggested that a nursery or daycare be provided within the on-site primary school.
 - Students suggested the developer fund expansion of the sixth form at Ashlyns School to support greater demand.

- Students stressed the importance of disabled access and accessible design, including for on-site parks, with consideration of the gradient.
- Students requested play areas for younger children near the primary school site.
 - Students wanted spaces specifically for children aged 10 to 16, including swings, football pitches, a soft-surface circular running track, tennis courts, and table tennis.
 - Students also support regular charity events or centres and youth groups which facilitate socialising and learning.

3.4 Tring

3.4.1 Survey respondents had the option to select which settlement area their response related to. 292 responses (21.5%) selected Tring, of which 4 were postal responses.

3.4.2 Of these, 215 (73.7%) said they 'agreed' or 'somewhat agreed' with the proposal, while 60 (20.6%) 'disagreed' or 'somewhat disagreed' and 17 (5.8%) were neutral.

3.4.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Tring, their top five priorities were:

- | | |
|------------------------------------|----------------|
| 1) Healthcare | – 74 – (25.3%) |
| 2) Green space and play facilities | – 58 – (19.9%) |
| 3) Public transport | – 52 – (17.8%) |
| 4) Community facilities | – 47 – (16.1%) |
| 5) Walking and cycling | – 41 – (14.0%) |

3.4.4 This ordering shared the same top two priorities as the overall survey results, but 'Public transport', 'Community facilities' and 'Walking and cycling' were particularly prioritised for Tring. Healthcare remains a clear priority.

3.4.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.4.6 Specific Bodies

- Aldbury Parish Council (APC) welcomes reduced housing in Tring and Berkhamsted, with less impact on local traffic and pressure on Ashridge.
 - APC wishes to see sustainable travel and SANG proposals for site Tr01 expanded on within the plan.
 - APC also states that any SANG should be close to the site and wishes to see explicit reference to mitigation, alongside guidance for developing new SANG
- Historic England notes that Tr01 is located between a Grade II Registered Park (Tring Park) and the (non-registered) parkland associated with the Grade II listed building Pendley Manor.
 - Historic England requests a Heritage Impact Assessment for the site to determine its suitability and establish any necessary development criteria to mitigate potential harm.
 - Historic England also makes detailed comments on site considerations:
 - Any assessment should consider the views from the Grade II* listed buildings (The Mansion and The Clock House) within Tring Park and

assess visibility of the site from the Summerhouse (Grade II), the western extent of the Charles II Ride, and Stubbings Wood.

- Design of the site should consider setback along Cow Lane and London Road to preserve openness, retain view corridors (where possible), and limit building heights.
- Historic England advises undertaking a masterplanning exercise or Concept Framework before submitting a planning application. This work should be informed by and reflect the findings of the detailed Heritage Impact Assessment, and this requirement should be stipulated in site-specific policy.
- The Chilterns Conservation Board acknowledges that Dunsley Farm Tring (TR01), now amended, has potential to avoid any negative impact on the AONB.
- The Environment Agency states that any proposal for site Tr01 should include appropriate risk assessments and should not negatively impact groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to the revised strategy for Tring:
 - Transport services state that connectivity to the station remains a priority to enhance sustainable travel choices for Tring and would support allocation of land and a policy for enhanced transport infrastructure to achieve this.
 - Historic Environment services state that Tr01 would likely require a pre-determination desk-based assessment and geophysical survey.
 - Lead Local Flood authority states that Tr01 is well-suited to above-ground SuDS and discharge must be restricted to greenfield rates and volumes. Tr01 is at low risk of flooding apart from a large surface water flow path in the middle of the site, which has associated flooding incidents on Cow Lane. The LLFA has identified Tring as a surface water flood risk hotspot.
 - Waste services plan to reconfigure and increase the number of containers at Berkhamsted recycling centre to increase capacity.
 - Education services state that the primary school site at Dunsley Farm is only required to deliver 2FE (forms of entry) of provision (2.03ha) as opposed to the 3FE size (3ha) listed within the consultation. At the secondary phase, future demand is assumed to be meetable within the existing school through expansion. Additional land will need identifying and safeguarding to ensure future expansion can be delivered.
 - Early Years services note one new childcare provision (0-2 years) is required, with nursery 3-4 and wraparound childcare 5-11 to be met at primary schools.
 - Adult Care Services note that they would support an allocation for specialist older persons housing at site Tr01.
 - Libraries services would increase capacity by reconfiguring and adding an Open Plus system and increasing resources at Tring Library. S106 or CIL will need to be made available to fund an increase in capacity at Tring library.

- Natural England make the following comments:
 - Natural England states that Tr01 lies within the Impact Risk Zone (IRZ) for Oddly Hill and Tring Park SSSI. Natural England expect to be consulted on developmental plans for this allocation so that they can assess impact pathways and provide comments on avoidance and mitigation measures to avoid increased damage to the site's interest features.
 - Natural England states that site Tr01 is located within a proposed area of search for a possible boundary variation to the Chilterns AONB.

- NHS Herts and West Essex Integrated Care Board (HWE ICB) notes the impact on Rothschild House practice from the Dunsley Farm allocation and so would seek a financial contribution to increase capacity there.

- Scotia Gas Network confirms that the upstream medium-pressure network has the capacity to support Tr01. If the site was instead connected to the nearby low-pressure infrastructure, then some reinforcement may be required.

- Tring Town Council make the following comments:
 - TTC supports the amended allocation at Dunsley Farm, provided that:
 - No other housing development occurs on the deleted sites or other large sites in the area.
 - The site's sensitivities (set out in The Landscape Report by Huskisson Brown dated June 2021) are respected, with significant landscape addition to the London Road boundary and appropriate landscaping to soften development and reduce impact of view from the High Scarp.
 - TTC supports education use on Tr01, and suggests additional provision of a sixth form college, to release space at Tring School, which is at capacity.
 - TTC would agree to an employment site on Tr01 provided it were limited to what was Use Class B1 (now contained in Use Class E) as the site is not appropriate for very large units or for HGV's. On this basis, it may be that the employment site could be reduced in size.
 - TTC suggests that Tr04 should be shown as office use as per the planning permission given to Cala Homes.
 - TTC recommends that Green Belt should be extended north-west to Wilstone and Long Marston, to compensate for the loss of Green Belt elsewhere, and to protect Tring Rural Parish.

- Wigginton Parish Council broadly welcomes the revised strategy for Tring and strongly supports removal of Tr03 and Tr02.
 - WPC states that the visual impact of future development from Wigginton escarpment should be minimised and views from the Twist, Wigginton and Ridgeway footpath protected. Development should use the local vernacular as recommended by the Chilterns Buildings Design Guide.

3.4.7 General Bodies/Other Organisations

- Adrian Cole FRICS Ltd queries the impact of a potential decision by an inspector to approve the Land East of Tring Appeal on the Local Plan.
- Butterfly Conservation – Hertfordshire and Middlesex Branch notes that Tring is the most sensitive area for butterflies in the Borough, with all seven of the Section 41 species present in areas of countryside around the town.
 - Butterfly Conservation agrees that the wildlife site on Tr01 should not be developed, and state that it is important for proposals on the site to focus on improving existing wildlife areas, enhancing habitats elsewhere on the site, and creating a green corridor.
 - Butterfly Conservation states that a green corridor would be crucial for species to move between Tring Park and Aldbury Nowers/Ashridge Estate.
 - Before confirming any allocation, a comprehensive ecological study should be conducted and Butterfly Conservation requests to be consulted on any proposals on the site going forward.
 - Butterfly Conservation notes the same principles should apply for Tr02 and Tr03 due to the significance of the town as a whole.
- Carney Sweeney on behalf of Lidl support the Council's recognition that Tring site TR04 Site is "actively promoted for non-residential use", and request that the site is allocated for a food store in the emerging Local Plan, which will fulfil the Council's identified need for further convenience floorspace in the town.
- Carter Jonas on behalf of the Generator Group promotes Land south of Aylesbury Road.
 - The Generator Group notes that the Council is not meeting local housing need, and states that Tring is a sustainable and accessible community where housing should be focused.
 - The Group state that their site, Tr01 would deliver approximately 235 homes, open and play space, enhanced pedestrian and cycle links, and potentially a school or care accommodation.
 - The Group notes that Tr01 is within the Chilterns AONB but does not exhibit any special qualities, being severed by the A41 from the wider landscape and thus could accommodate sensitively designed residential development.
 - The Group also notes that the site's Green Belt and contribution to the AONB would have weakened since the development of LA5.
- The Council for the Protection of Rural England (CPRE) is concerned about the development of Dunsley Farm as a Green Belt site and the strain on infrastructure.

- Clark Contracting Limited has promoted their site 'Pitstone Quarry' for Suitable Alternative Natural Greenspace (SANG), and notes that the site is in the process of being extracted and restored to be used as SANG (subject to planning permission).
- Cullercoats Landholdings are promoting land located at the meeting point of Station Road and Cow Lane (Tr-h4) for a small-scale scheme to deliver a dedicated cycle/footpath to connect Station Road and Cow Lane, and gifting of a parcel of woodland immediately to the south of the Sports Clubs which would enhance Pendley Sports' facilities and benefit the wider community as part of an improved green infrastructure.
- Dacorum Sports Network, in conjunction with Tring Sports Forum, proposes the eastern half of Tr01 is allocated for sport to complement and enhance the Cow Lane facilities, namely for rugby and football, as well as squash and bowls.
 - DSN notes that the Cricket and Tennis Clubs also adjoin the west of the site and could expand into the Tr01 allocation.
- Emery Planning states that the proposed growth for Tring is too low, and will exacerbate affordability issues in the town, arguing that the plan should allocate at least 2,700 dwellings for this settlement.
 - Emery Planning promotes Tr04 Land north of Icknield Way, Tring (Waterside Way) for 300 homes, arguing that it relates well to the existing town and welcoming discussions on increasing the proportion of affordable housing.
 - Emery Planning notes that its site is not constrained by the AONB or other constraints and questions the assessment of the Green Belt parcel as strong, noting that other sites assessed 'strong' have previously been allocated.
- Grove Fields Residents Association, on behalf of 585 local residents, welcomes the exclusion of the Land East of Tring site for reducing the impact on the Green Belt and the AONB and considers the size of the housing proposed for Tring far more commensurate with its current size.
 - GFRA considers Tr01 Dunsley Farm a superior choice for new residents, and less reliant on cars than Marshcroft Village, Tr02 and Tr03, so therefore more likely to encourage pedestrian access to the town's shops and facilities.
- Herts & Middlesex Wildlife Trust welcomes the reduction in the site capacity of Tr01 in order to protect the Local Wildlife Site but is concerned that the wildlife site is retained within the boundary of the housing allocation.
 - The Trust insists that development of the site must ensure that the wildlife value of the meadows is enhanced, not harmed.
- Icen Projects on behalf of Millbank Land promotes their land at Bulbourne Park as a deliverable and sustainable site which is well-linked to the existing settlement of Tring would be able to come forward early in the plan period and which could be allocated

with limited harm to the Green Belt and landscape, supported by evidence submitted in February 2021, and is not in need of significant infrastructure works.

- MSC Planning considers the Tring strategy poor for not concentrating development in and around Tring Station or upgrading links to the A41.
- Pegasus Group on behalf of L&Q Estates believes the plan is not meeting Tring's needs and promotes New Mill as an unconstrained site with minimal impact on the Green Belt and the landscape.
 - L&Q Estates requests a discussion with the Council regarding alternative options for SANG provision in order to re-instate the site.
- Ryan and May on behalf of Harrow Estates comments that the evidence base suggests that housing needs can be fully met, but there is too much reliance on urban brownfield sites with no family homes or affordable housing.
 - Harrow says evidence suggests that there is a housing crisis in Tring, with more homes needed for working aged people and worsening affordability.
 - Harrow notes that analysis of Tr03 in the sustainability appraisal disregards its affordable housing, biodiversity net gain, and socio-economic benefits.
 - Harrow suggests amending the plan to include Tr03, the SA to reflect inquiry evidence, and amending the SHLAA to remove highway concerns.
- Sustainable Tring (ST) supports reduced housing allocations but would like to see improved community facilities and greater consideration of the climate emergency.
 - ST wants new housing in Tring to be carbon neutral, with offsetting towards local renewable energy (not tree planting), in-built biodiversity measures and on-site electricity generation considered.
 - ST notes that Tr01 Dunsley Farm is agricultural land and considers its allocation contrary to the Land Use Framework that seeks to maintain food production.
 - ST suggests that the Sunnyside Rural Trust is offered some land.
 - ST would like to see greater support for biodiversity in Tring.
 - ST would like greater clarity on plans for Cow Lane Farm, such as further work to understand its special wildlife status and potential as a strategic wildlife corridor, enhancing nature by 20%, improving habitats for pollinators, and considering the historical context of Grade II Jeacock's Orchard.
 - ST expresses concern regarding the planning application for The Dairy and associated buildings on Cow Lane.
 - ST would like to see small business units/workshops, a primary school, improved walking/cycle access, a community farm, and other innovative community resources such as a repair shed, gallery, venue, sports facility or library on the site.

- Tring Tornadoes notes no mention of new sports provision and wants Cow Lane Farm allocated as an expanded sports hub for use by Tring Tornadoes, and local cricket and rugby clubs, in order to address current and future shortfalls.
 - Tornadoes suggest that Tring Parish Council should develop a neighbourhood plan, which Tornadoes could take a lead on, if funded.
- Tring & Berkhamsted Labour Party requests that social housing be built in the early stages of the plan period, at a rate of 80% and close to public transport and facilities.
 - T&BLP notes that Dunsley Farm (Tr01) is Green Belt and would prefer brownfield development such as upon sites in Berkhamsted.
 - T&BLP states that Tr06 could provide 100 social housing dwellings close to facilities, which would be preferred to a supermarket.
 - T&BLP states that Miswell Lane and Icknield Way (Tr05) could deliver 100 social housing homes, before the Green Belt at Tr01 is considered.
 - T&BLP notes that a density of 100 dwellings per hectare can be achieved on brownfield, compared with 31 dph on Dunsley Farm. Social housing should be close to public transport and facilities as less likely to own car.
 - T&BLP requests protections and expansions for natural habitats with new habitats to be created through migratory corridors, such as a wildlife crossing over the A41 or an extension of the buffer woods alongside the A41.
- Extinction Rebellion Tring and T&BLP both state that if Green Belt is built on, over 50% should be designated for green infrastructure and/or SANG, with existing semi-natural ecosystems protected or expanded for Biodiversity Net Gain
 - As with Sustainable Tring, Extinction Rebellion Tring and T&BLP both convey residents' desire for a community hub including a repair shed, exhibition space, a community farm, workshops, and sports facilities.
 - Extinction Rebellion Tring and T&BLP would both prefer retention of a large portion of Tr01 for green infrastructure, preserving trees and hedgerows.
- Tring Park Cricket Club requires an additional cricket pitch on the field adjacent to the club to accommodate existing and future increasing demand.
 - TPCC is considering a joint venture with Tring Tennis Club for an indoor cricket and tennis centre, and they are concerned that development on Dunsley Farm could prevent any future expansion of the clubs.
- Tring Tennis Club currently experiences pressure on its courts so it would like to offer padel tennis and pickleball and would also like land adjacent to the club for 2 indoor courts (also for pickleball) and 2 padel tennis courts. TTC suggests that these could be in a multi-sports building with indoor cricket, and other sports such as netball.
- Tring Art Group has submitted proposals for a community hub at Tr01 which could include an art gallery, community cinema, meeting room, workshop facilities, shop/café, community halls, a plaza, and artisan studio pods for hire.

- The Group believes that Tring is well placed to host a creative hub, and Tr01's central location and available land would make this an appropriate site.
- Vincent & Goring on behalf of Hertfordshire County Council Property is promoting site Tr01 Dunsley Farm.
 - HCC welcomes the provision of older persons' accommodation and the site's reduced scale reflecting Cow Lane Farm's biodiversity.
 - HCC requests a new fire and rescue station on the site, noting that the existing station could provide windfall housing.
 - HCC notes that a 2ha land take is necessary for a 2FE primary school.
 - HCC expects DBC to secure contributions from other major development sites for provision of any infrastructure requirements provided by HCC that go beyond what would make the development itself acceptable.

3.4.8 Wider Community

- There was strong agreement to the revised level of growth proposed in Tring, with many respondents also stating their support for deleting Land East of Tring as an allocation from the Plan.
- However, it was felt that the new homes and Dunsley Farm would still require infrastructure such as education and health facilities, appropriate low-rise design, retention of the existing local wildlife site, hedgerows and its countryside feel, sustainable homes, and community provision
- Specific needs raised for Tring included:
 - More social and affordable housing and opportunities for first-time buyers.
 - Sustainable transport provision, including new pedestrian and cycle routes and more public transport, with improved connections to the train station.
 - Highway measures to reduce town centre congestion.
 - Preservation of independent shops and an additional supermarket.
- Other respondents did not support the allocation of Dunsley Farm due to the impact on the AONB and associated views, Green Belt, the countryside, infrastructure, traffic congestion and character of the town.
- Some opposed the strategy of increasing growth in Hemel Hempstead and felt that more new homes should be built in Tring to reduce pressure on Hemel Hempstead.
- A resident within the call for sites suggests the inclusion of land between Grove Road and Northfield Road as public open space.

3.5 Bovingdon

3.5.1 Survey respondents had the option to select which settlement area their response related to 43 responses (3.2%) selected Bovingdon, of which 3 were postal responses.

3.5.2 Of these, 15 (34.9%) said they 'agreed' or 'somewhat agreed' with the proposal, while 22 (51.2%) 'disagreed' or 'somewhat disagreed' and 6 (14%) were neutral.

3.5.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Bovingdon, their top five priorities were:

- 1) Healthcare – 10 – (23.3%)
- 2) Green space and play facilities – 10 – (23.3%)
- 3) Public transport – 9 – (20.9%)
- 4) The road network – 7 – (16.3%)
- 5) Drainage and flood prevention – 6 – (14.0%)

3.5.4 This ordering was not dissimilar from the survey's overall infrastructure priority results, and the small sample size limits useful analysis. Healthcare remains a clear priority. However, 'Public transport' and 'Drainage and flood prevention' were notably prioritised, which appears to be a pattern across the smaller settlements.

3.5.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.5.6 Specific Bodies

- Cerda, on behalf of Bovingdon Parish Council, raises concerns about the expansion of Bovingdon Brickworks (Cy02) in relation to policies DM16, DM17, and SP11.
 - BPC notes that the allocation would be remote and detached and would cause harm to the Green Belt by encroaching into open countryside and filling a crucial visual and spatial gap.
 - BPC recognise that no exceptional circumstances justify this allocation.
- The Environment Agency requires development at Bv01 Grange Farm to prevent harm to the Gade water body and any increase in surface water run-off, use effective SuDS interventions to mitigate it, include risk assessments, and not affect groundwater quality.
- The following services within Hertfordshire County Council made comments with regards to the revised strategy for Bovingdon:

- Transport services note that the development level proposed in Bovingdon is not large enough to contribute meaningfully towards service improvements on the currently limited public transport provision.
 - Historic Environment services note that sites Bv01 and Bv02 would likely require pre-determination desk-based assessment, geophysical survey, and trial trench evaluation.
 - Lead Local Flood Authority states that sites Bv01 and Bv02 are suitable for above-ground SuDS. A large flow path at Bv01 causes flooding west of the site, so mitigating the flow path would reduce this risk. This site is being consulted by the LLFA. Bv02 has low flood risk, but the existing pond poses a surface water risk. Properties on Hyde Lane have experienced past flooding.
 - Education services consider managing the potential growth at the primary level challenging. HCC does not view the 230-home scenario as unsound (noting that existing planning applications allow for up to 316 homes), but the service acknowledges that creating additional primary school places in the village may be difficult due to current constraints. Furthermore, the growth in the village could displace children in the Two Waters area, highlighting the importance of locating a new primary school there. Planning for secondary schools in Bovingdon occurs in conjunction with Hemel Hempstead.
 - Early Years services note no new childcare provision required. New nursery provision 3-4 will be made at the new primary school to meet demand.
 - Library services would increase capacity by increasing resources at Bovingdon Library. S106 or CIL will need to be made available to fund an increase in resources at Bovingdon library.
- Historic England state that Bv01 and Bv02 fall within the wider setting of several designated assets comprising three Grade II listed buildings and a Scheduled Monument, and request that a Heritage Impact Assessment is undertaken to confirm suitability and to inform any development criteria that may be necessary to mitigate harm resulting from the development.
 - NHS Herts & West Essex ICB note that site Bv01 will impact GP provision at Archway and Longmeadow in Bovingdon, the latter being a branch of Kings Langley Surgery which plans to expand and reconfigure their building to increase capacity and alleviate pressures in Bovingdon. A financial contribution is sought for this.
 - Natural England state that sites Bv01 and Bv02 are located within a proposed area of search considered for a possible boundary variation to the Chilterns AONB.

3.5.7 General Bodies/Other Organisations

- Butterfly Conservation – Hertfordshire and Middlesex Branch said the following:
 - Bv01 – This site is within 10 meters of a wildlife site and one of the best locations in Herts for the *Dingy Skipper*, a rare species protected by section 41 of the NERC, and their habitat requirements need special consideration. A

full ecological survey is essential. If development proceeds there should be appropriate provision for the creation and enhancement of further *Small Blue*, *Dingy Skipper* and *Small Heath* habitat.

- Bv02 – This site is currently a mixed habitat including a mosaic of grassland, scrub, mature trees, and pond. It is within 400 meters of an existing Dingy Skipper colony (a s41 species). It is likely to have high biodiversity and should be subject to a full ecological assessment prior to confirming its allocation for development.
- Community Action Dacorum noted that references to building community spaces should be made explicit, and at present the Scout building in Bovingdon is the only community space mentioned.
- DLP Planning on behalf of Taylor Wimpey, notes 230 new homes planned in Bovingdon by 2040, a 5% decrease from the 2020 proposal.
 - TW recommends the Council consider ways in which to bring retained sites in Bovingdon forward as early as possible to address shortfalls.
 - TW suggests that the allocation be increased to 186 dwellings, including Extra Care units and community uses, to match the application (23/02034/MFA). This would optimise land use as HCC does not require or support a school on Grange Farm.
- OSP Architecture on behalf of the landowners of Hempstead Road, Bovingdon, promote their site for residential development and public open space, stating that the site is free from significant constraints and can deliver several sustainability benefits.
- Phase 2 Planning on behalf of Gleeson Developments argues that developing Duckhall Farm instead of Grange Farm would have less impact on the Green Belt.
 - Gleeson argues that Duckhall Farm is closer to village facilities, and can provide additional benefits such as SANG, and a track connecting Bovingdon to Little Hay. Comparatively, it also reduces traffic in the village centre.
- Pegasus Group on behalf of Taylor Wimpey notes that the Council should reconsider and re-evaluate discounted sites in Bovingdon, which can sustain higher growth, such as Homefield which can accommodate 120-130 homes, along with a community facility and parking.
 - TW notes that HCC Highways has confirmed safe access via Green Lane.
 - TW states that releasing Homefield from the Green Belt would not greatly affect its purposes, and that the landscape sensitivity is low.
 - TW offers SANG in Dacorum.
 - TW suggests that an on-site over-provision of car parking could address the lack of parking on the High Street and mitigate concerns of conflict with existing on-street parking on Green Lane.
 - TW suggests that Homefield could safeguard land for healthcare, community facilities, or other local needs identified through community engagement,

justifying its release from the Green Belt for housing development.

3.5.8 Wider Community

- Community members felt that Bovingdon does not have capacity for the large number of new dwellings proposed. In particular this would have an impact on:
 - The High Street, which is already very busy and has inadequate parking, leading to parking on pavements and congestion on nearby streets;
 - Heath facilities, where an extra GP practice would be needed;
 - Education facilities, with insufficient primary school space for the level of growth and pressure on secondary schooling as well;
 - The character of the village, changing it to a small town.
- Some community members felt that Grange Farm should not be built on as it would result in urban sprawl, change of character, loss of Green Belt (and establish a precedent for further loss in future), recreational pressure on the Box Moor Trust reserve, highway safety issues, an increase in local traffic and traffic on wider connecting routes. They also noted that the site is within a flood zone.
- Other concerns stated that:
 - The plan has not considered the planning application for 54 units at Bobsleigh Inn nor the opportunity for brownfield development on Bovingdon Airfield;
 - The Green Belt boundary should be adjusted to align with minor development that has taken place within it; and
 - An additional direct link road to the A41 is needed from Bovingdon.

3.6 Kings Langley

3.6.1 Survey respondents had the option to select to which settlement area their response related. 64 responses (4.7%) selected Kings Langley, of which 2 were postal responses.

3.6.2 Of these, 40 (62.6%) said they 'agreed' or 'somewhat agreed' with the proposal, while 20 (31.3%) 'disagreed' or 'somewhat disagreed' and 4 (6.3%) were neutral.

3.6.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Kings Langley, their top five priorities were:

1) Healthcare	– 14 – (21.9%)
2) Green space and play facilities	– 13 – (20.3%)
3) The road network	– 10 – (15.6%)
4) Public transport	– 9 – (14.1%)
5) Emergency services	– 7 – (10.9%)
Drainage and flood prevention	– 7 – (10.9%)

3.6.4 This ordering was very similar to the survey's overall infrastructure priority results, and the limited sample size limits useful analysis, but 'Emergency services' and 'Drainage and flood prevention' were notable priorities for Kings Langley.

3.6.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.6.6 Specific Bodies

- The Canal & River Trust notes that, in relation to site KL02: Rectory Farm, they have provided detailed comments on a planning application for the site, and that the Local Plan now proposes it to be deleted as an allocation.
- Kings Langley Parish Council (KLPC) agrees with the current proposals for the Parish and make the following points:
 - The Parish Council agrees with the proposals for the area, supporting the proposed deletion of draft allocation KL02 and the continued exclusion of Shendish Manor (SHLAA 2023 ref. Hemel117R) and Wayside Farm (SHLAA 2023 ref. KLang019R) in the Local Plan as allocations for development.
- Nash Mills Parish Council believe that the traffic calming measures proposed in the Kings Langley Neighbourhood plan could exacerbate traffic within Nash Mills by creating a 'rat run' route through the parish as the fastest alternative route.

- The Herts and West Essex Integrated Care Board states that Kings Langley Surgery and Haverfield Surgery will be affected by housing growth in Three Rivers District, near Kings Langley and Abbots Langley.
 - Haverfield Surgery in Kings Langley relocated in March 2020, noting that this project factored in some forecasted housing growth.
 - An Outline Business Case has been approved in principle to extend and reconfigure Kings Langley Surgery premises, to enable the practice better to cope with existing pressures and absorb some additional growth.
 - However, the ICB notes that this proposal is dependent on additional land being leased or purchased from the Council.

- Three Rivers District Council make the following comments:
 - TRDC welcomes no Green Belt allocations in Kings Langley and the deletion of the Rectory Farm site.
 - TRDC notes that capacity issues with the M25/A41 junction are a mutual issue in Dacorum and Three Rivers and it is recognised that growth in both authority areas will potentially have an impact on capacity on this network.
 - TRDC is committed to modelling and assessment of the junction and will ensure that any identified impacts can be mitigated and managed appropriately.
 - TRDC stated that suitable and achievable measures to improve capacity will be included in the Three Rivers Infrastructure Delivery Plan (IDP).

3.6.7 General Bodies/Other Organisations

- CBRE on behalf of Silversaw Ltd, in respect of their land interest at the rear of Hill Farm (SHLAA site KLang011R), recognises the importance of relieving recreational pressure on the SAC and notes that Kings Langley is the settlement furthest from the SAC and does not appear in visitor surveys as a major 'starting point' for trips there.
 - In contrast, Silversaw supports the justification for reduction of sites in Berkhamsted and Tring as areas more affected by the SAC exclusion zone.
 - Silversaw considers the delivery of 4 homes a year during the plan period at odds with the suitability of Kings Langley to accommodate more housing and at odds with the NPPF, paragraphs 15 and 16.

- Claremont Planning is representing Landhold Capital on behalf of European Property Ventures (Hertfordshire) Ltd (EPV), promoting KLang021R (Barnes Lane).
 - EPV believes that KLang021R would assist in meeting house needs, provide benefit close to the village centre, and with the A41 would provide a strong and defensible Green Belt boundary to the west of the settlement.
 - EPV believes that Kings Langley should have had housing retained, as in Bovingdon, as it is higher up the settlement hierarchy and more sustainable.

- EPV notes the high unaffordability of properties in Dacorum, and thus states that housebuilding should be encouraged to increase supply.
- EPV encourages the Council to revisit safeguarding land for development and to review all Green Belt land, particularly at Kings Langley, including the promoted site, Barnes Lane, and previously assessed land to the south, KLang011R.
- Montagu Evans, on behalf of Angle Property (RLP Rectory Farm) LLP, who have an interest in KL02, considers the Revised Strategy unsound for several reasons.
 - Angle Property disagrees with the Revised Strategy in its assessment that the approach to Kings Langley is consistent with the size, character, and the limited practical development opportunities available. Rather, Angle Property cites Appendix C of the SHLAA Update (October 2023 – page 125) which notes site allocation KL02 remains suitable, available and achievable.
 - Angle Property believe the Council should therefore revisit opportunities for allocating additional suitable land (such as at KL02).
- Kings Langley & District Residents Association (KLDRA) agree with the current proposals for Kings Langley, including the removal of Rectory Farm as a development site, proposing that the whole greenfield area at Rectory Farm should be provided to the community as a recreational area.
 - KLDRA is greatly concerned about the effect of large-scale development between Kings Langley and Apsley, along the A4251 corridor, and the potentially high volume of additional traffic which would have an increased pollution impact upon Kings Langley
 - KLDRA welcomes the development of brownfield sites, but notes a lack of publicly accessible green spaces and requests more such amenities in and around settlements throughout Dacorum.
 - KLDRA requests that adequate infrastructure be provided before, or at the same time as, new houses are built with clear definition and guarantees.
- DLP Planning Limited note at the 75% decrease from the proposal in 2020 down to 68 new homes in Kings Langley.

3.6.8 Wider Community

- Some residents submitted repeat comments, which we reflect in the comments below, particularly in relation to the level of development along the A4251 corridor and associated congestion, pollution and infrastructure issues.
- There was support for the more balanced and appropriate level of growth, protecting the Green Belt and wildlife habitats, retaining Kings Langley's historic character, removing the Rectory Farm allocation (KL02), keeping Shendish and

Waynes Farm excluded from the plan, and focusing on brownfield sites.

- Respondents considered the revised local plan is much improved and balancing the needs for housing and the existing communities, countryside and AONB.
- Respondents agreed with focusing development around market towns where more appropriate infrastructure is available.
- Nevertheless, other respondents considered the level of housing in the Revised Strategy excessive and damaging to an already urbanised borough, proposing instead that the amount of housing should be minimal and on brownfield land only.
- Some respondents requested that the emerging strategy be set firmly within the context of the emerging South West Hertfordshire Joint Strategic Plan with future policies and proposals for the village determined in close co-operation with Three Rivers District Council.
- Many respondents supported the Council pushing back further on the housing target as Three Rivers District Council has done.
- There was support for protecting the Green Belt around the village to prevent Kings Langley coalescing with Apsley and Nash Mills as well as urban sprawl towards Leavesden and Abbots Langley.
- Some responded that the Local Plan should ensure more sufficient housing is built to meet the needs of a growing population, particularly in a sustainable location such as Kings Langley.
- Some proposed retaining the Rectory Farm site for open uses e.g. growing food or amenity / recreational space, to prevent the amalgamation of settlements and protect the character of Kings Langley.
- Some raised concerns regarding infrastructure, noting insufficient local parking, the doctors surgery at capacity, poor rail services, and the lack of a hospital.
- Concerns were raised regarding the water supply supporting more growth, given that the chalk stream aquifer is already overextracted, and is harming the River Gade.
- Some noted that draft Local Plan had not appeared to address a number of issues that are dealt with in the Strategic Housing Land Availability Assessment report.

- Some stated that the Plan should require new on-site SANG provision for every new greenfield development larger than 50 dwellings.
- Objections were raised to the development of Apsley Mills Retail Park for 500 homes with fears that it would result in additional congestion and loss of retailing, and that the height and density would be overwhelming for the area.
- Some stated that the Revised Strategy should prioritise social over market housing, development should be close to transport hubs, and that there must be a stronger commitment to sustainable development and green infrastructure.
- Some noted that Kings Langley is more capable of absorbing growth than Berkhamsted, as the latter sits in a steep sided valley, is densely built-up, congested and already has inadequate infrastructure.
- Some stated that the Revised Strategy gives insufficient consideration to County Council owned land at Wayside Farm, Kings Langley.
- A suggestion was made to use Nuckett Wood as SANG in order to ensure it is properly maintained.

3.7 Markyate

3.7.1 Survey respondents had the option to select which settlement area their response related to. 24 responses (1.8%) selected Markyate, of which 3 were postal responses.

3.7.2 Of these, 8 (33.3%) said they 'agreed' or 'somewhat agreed' with the proposal, while 13 (54.2%) 'disagreed' or 'somewhat disagreed' and 3 (12.5%) were neutral.

3.7.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Markyate, their top five priorities were:

1) Healthcare	– 8 – (33.3%)
2) Public transport	– 7 – (29.2%)
3) Drainage and flood protection	– 5 – (20.8%)
Community facilities	– 5 – (20.8%)
Education	– 5 – (20.8%)

3.7.4 This ordering differed significantly from the overall survey results, although the very limited sample size should be noted as not representative. 'Healthcare' remained the clear priority, as borough-wide, but 'Public transport' and 'Drainage and flood protection' were notably prioritised, as in other smaller rural settlements in the Borough.

3.7.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).

3.7.6 Specific Bodies

- Markyate Parish Council
 - The Parish Council approves of the reduction in proposed development.
 - The Parish Council raise the importance of access to the Hicks Yard site is as far from the Hicks Road/A5183 junction as possible.
 - The response also states that the provision of adequate parking will be required due to high car ownership in the village – which is already causing increased on-street parking which results in safety concerns and increased congestion.
 - The Parish Council recommends a parking stress test be conducted ahead of development to limit impacts.
- The Hertfordshire and West Essex Integrated Care Board raise few comments on Markyate specifically but note that the Markyate branch of the Rothschild House Surgery (served by primary care network 'Alpha') was recently refurbished and

extended as part of an NHS capital funded project in 2019 to serve Markyate and surrounding rural villages. They also note that the creation of primary care networks is intended to reduce demand on GP services by providing more integrated community care.

- *Natural England state that site Mk03 is located within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB)⁶.*

3.7.7 General Bodies

- Bidwells on behalf of Mr Roger Smith and the Lyell Trustees note that development is necessary for the sustainability of villages and that Markyate Village School is undersubscribed, and make the following comments in relation to their site, Cotton Spring Farm:
 - Comments state that the site would not harm the wider Green Belt purposes.
 - It is noted in the response that development of Cotton Spring Farm, alongside the London Road site, there would be opportunity to create a bypass around the village to take pressure off London Road and the high street. Therefore, they recommend that the allocation for Mk01 should be re-instated.
 - The response notes that the land will provide new affordable homes, green infrastructure and biodiversity net gain, alongside onsite SANG which could be used to alleviate pressure on high density sites in Hemel Hempstead.
- DLP Planning on behalf of Taylor Wimpey McCarthy Stone and Whiteacre Ltd notes that 75% of the growth proposed in Markyate in 2020 has been removed, and that 58% of its 2023 need is reliant on unallocated sites.
- McLoughlin Planning on behalf of DB Land & Planning Consultancy objects to the revised strategy and to the deletion of Mk01:
 - McLoughlin Planning argue that evidence supports the site's release from Green Belt, which would present an ideal opportunity to deliver rural housing not subject to any other prohibitive environmental designation.
 - McLoughlin Planning does not believe "local infrastructure" and congestion concerns cited for de-allocation are supported by evidence.
 - McLoughlin Planning is not convinced that Mk03 will come forward for development and argue that Mk01 instead will address the shortfall in supply, particularly in the next five years.

⁶ Please note that officers are awaiting further clarification from Natural England with regards to this, as the site is within the built area of a settlement.

- McLoughlin Planning promotes the reallocation of Mk01 for at least 150 dwellings, with its suitability evident throughout the Emerging Plan process.
- MSC Planning support the removal of Markyate land from the strategy to counter ribbon development and traffic increase but notes no SANG availability in the area and the lack of a comprehensive plan for the village.

3.7.8 Wider Community

- Respondents who selected Markyate were most concerned about how the planned development across the Borough would affect existing infrastructure and felt there had not been enough planning for this, particularly regarding Hemel Hempstead, which they felt had received an unfair redistribution of new homes.
- Respondents also called for social housing and affordable rents to be prioritised.
- A response to the call for sites from a resident stated that the proposed deleted sites in Markyate should be re-instated to allow local people to remain within their area.
- Another resident proposed the building of a new town on the area of countryside surrounding Markyate between the M1 and Watling Street, as opposed to HH01.

3.8 Countryside

- 3.8.1 Survey respondents had the option to select which settlement area their response related to. 221 responses (16.3%) selected Dacorum's Countryside, of which 4 were postal responses.
- 3.8.2 Of these, 77 (34.9%) said they 'agreed' or 'somewhat agreed' with the proposal, while 124 (56.1%) 'disagreed' or 'somewhat disagreed' and 20 (9%) were neutral.
- 3.8.3 Survey respondents had the option to select their five infrastructure priorities. For those who respondents selected Dacorum's Countryside, their top five priorities were:
- | | |
|------------------------------------|----------------|
| 1) Healthcare | – 53 – (25.8%) |
| 2) Green space and play facilities | – 43 – (22.4%) |
| 3) The road network | – 33 – (20.1%) |
| Education | – 33 – (20.1%) |
| 5) Drainage and flood protection | – 30 – (13.6%) |
- 3.8.4 This ordering was not largely dissimilar from the survey's overall infrastructure priority results, but 'Education' and 'Drainage and flood protection' were notably prioritised for Dacorum's Countryside. Healthcare remains a clear priority.
- 3.8.5 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).
- 3.8.6 A number of comments within this section referred to one of the six main settlements, therefore to avoid duplication, these comments have been summarised within their relevant section.

3.8.7 Specific Bodies

- The Canal & River Trust continues to promote a site at Wilstone (Wils004R). They also wish to continue discussions with the Council with regards to identifying SANGs on Trust land. They wish the towpath to be promoted as an active Travel Route.
- Great Gaddesden Parish Council notes that the plan ignores the effect on rural areas surrounding HH01, with no commitments to invest in rural village infrastructure to cope with increased traffic and water supply and disposal.
- The Hertfordshire Innovation Quarter and Hertfordshire Local Enterprise Partnership support the retention of employment sites Cy01 to Cy04, subject to the Council's review of employment sites, within the Countryside strategy.

- Historic England states that a heritage impact assessment will be needed for site Cy02, as it is southwest a Scheduled Monument, and for site Cy03 as it is adjacent to a Grade II listed building and with the setting of other Grade II listed buildings.
- Little Gaddesden Parish Council request to have the land on the south side of Church Road from Bowls Club car park to hedge beyond the church and fields to south as designated Local Green Space.
- Nettleden with Potten End Parish Council states that the revised strategy fails to consider the cumulative impacts of development on rural areas, with regards to traffic, secondary school provision, and water supply and disposal. The parish council raised that consultation methods selected by the council disenfranchise rural residents.

3.8.8 General Bodies/Other Organisations

- AECOM promote Land at Delmer End Lane and Singlets Lane, Flamstead (SHLAA 2023 Ref. Flam001R and Flam003R), on behalf of the landowners Pennard Bare Trust, and state that these sites would provide comprehensive infill to Flamstead with minimal negative impacts on Green Belt.
- Box Moor Trust continue to promote land at Bourne End Field, which was provided to the trust as Exchange Land and is used for grazing. The trust state that the land does not provide the amenity benefit they aspire to achieve and believe that development of this site would support greater engagement with their beneficiaries the area.
- E H Smith (Holdings) Ltd supports the continued consideration of Cy02 Bovingdon Brickworks as an employment allocation and note that responses have been received from DBC Policy and HCC Highways in support of the planning application proposals.
- The Gaddesden Estate is promoting a site at Bridens Camp site to deliver a small number of dwellings. The estate notes that the site is within a ribbon of existing development and would form a logical infill along Red Lion Lane.
- Lambert Smith Hampton (LSH) on behalf of Plato Estates Ltd reiterate the suitability of their site (SHLAA 2023 Ref. CRoa001R) for development as a care home, specialist older persons housing or a 100% affordable housing scheme due to its location near to transport links. They also note the site does not have a high landscape quality and is well screened, as well as demonstrating a lack of agricultural value, limited contributions to the Green Belt. LSH argue that the SHLAA fails to assess potential sites within the AONB.

- Michael Sparks Associates on behalf of Akira Eesa Developments Ltd suggest the inclusion of Land East of Upper Bourne End Lane for employment development, specifically smaller to medium sized units, and argue that the approach taken by the SHLAA 2023 to screen out sites based on designations is unsatisfactory.
- The National Trust promote the designation of land at Hill Farm for a Gateway site within the Dacorum Local Plan. They note that a gateway site is an innovative and emerging concept with regards to avoidance and mitigation measures at Ashridge, and state that this site can create an attractive alternative to Ashridge that deflect users away from there, reducing recreational pressures as a result. The trust note that this will deliver.
 - A visitor hub to serve a catchment of at least 12.6km, which will provide a café and education facility and community space.
 - A substantial area of new, high quality open space for the public to visit and enjoy in perpetuity.
 - Enabling public access to mature woodland and providing a mixture of experiences.
 - Play and recreational opportunities for children of all ages and abilities that is of a suitable scale and in keeping with the natural feel of the site.
 - New high-quality signage.
 - Sustainable land management and conservation practice.
- Pegasus Group on behalf of Westmorland Limited promote land south of Old Watling Street for the use as a truck stop. The response sets out proposals which include junction improvements, to alleviate existing safety concerns and conflict points, and sets out improvements to the layout and capacity at the A5183/Chequers Hill junction.
- Rectory Homes make the following comments in relation to their site (SHLAA 2023 Ref. Wils002 Grange Road and Site Wils003 Lock Field) state that development of their sites would result in logical and sustainable growth of Wilstone, and that this will accommodate growth to help meet local needs. They also recommend that:
 - The northwest of Dacorum suitable is outside of the Green Belt and AONB, making this area suitable for small-scale growth that can develop quickly with less impact environmentally.
 - Rectory homes recommends the Council identify more small-and-medium-sized sites, with a proportion redirected to rural areas to sustain and revitalise local services and communities.
- Turley on behalf of Ainscough Strategic Land confirms that their site 'Land at the Former Marsworth Airfield' (SHLAA 2023 Ref. LMar003) remains available and suitable for development, and state that Marsworth Airfield should be allocated as an alternative to the release of Green Belt land. The updated SHLAA does not contain an assessment of the site itself within Appendix C, so the rationale for exclusion is unknown. Turley requests the council engage actively with Buckinghamshire Council.

- Welchman Planning state that their site 'Land at Iona, Vicarage Road' was previously discounted for being too small (SHLAA Ref, PEnd002R), and states that this approach is inconsistent with the NPPF's requirement to identify at least 10% of the housing requirement as small sites.

3.8.9 Wider Community

- Infrastructure was the primary concern, particularly traffic, healthcare and the hospital, and education, with GP services and public transport provision also of concern. Water End bridge and the Leighton Buzzard Road were frequently cited as areas of congestion, with concerns about 'rat-runs' developing through rural villages.
- There were strong concerns about the loss of Green Belt land, especially adjacent to the Chilterns AONB, with the risk of increased stress on the Chilterns Beechwoods SAC. Many called for brownfield sites to be prioritised over Greenfield development.
- Similarly, there were strong concerns about loss of wildlife and natural environment in rural areas, particularly north of Hemel Hempstead.
- There was particular concern regarding Piccotts End and a fear that it would be absorbed by site HH01, its character changed, and its conservation area damaged. Many called for there to be no building in the Gade Valley.
- There was concern about building on arable land and an apparent lack of consideration for agriculture.
- There was strong concern about stress on the water table and pollution of the chalk streams, particularly the Gade. There was also concern about flooding and drainage issues caused by new developments, especially around Piccotts End.
- Air pollution from increased traffic was another major concern, as was noise pollution to be caused by construction in rural areas.
- There was insistence on the need for more social housing and truly affordable housing.

3.9 Other

- 3.9.1 Survey respondents had the option to select which settlement area their response related to. 44 responses (3.2%) selected Other, of which 2 were postal responses.
- 3.9.2 Of these, 17 (38.6%) said they 'agreed' or 'somewhat agreed' with the proposal, while 22 (50%) 'disagreed' or 'somewhat disagreed' and 5 (11.4%) were neutral.
- 3.9.3 Locations and topics respondents denoted as "Other" included: Apsley, Ashridge, Bourne End, Boxmoor, Buckinghamshire, Chiltern Beechwoods, Chipperfield, Flamstead, Grovehill, health services HGC, the Hospital, Housing Need, infrastructure, Leverstock Green, Little Gaddesden, Nash Mills, Northchurch, Potten End, Redbourn, SANG, Shendish Manor, St Albans, Station Gateway, Sustainability Assessment, Tring Rural Villages, Woodhall Farm.
- 3.9.4 Consultation responses have been grouped according to the type of respondent: specific bodies (whom the Council is legally obliged to consult), general bodies (any other response submitted on behalf of an organisation), and wider community (responses from individuals).
- 3.9.5 Where appropriate, specific, other and general bodies who selected 'other' have had their response re-categorised within the most appropriate section of this document for the purposes of summarising responses and reducing duplication.

3.9.6 Specific Bodies

- Buckinghamshire Council acknowledge there hasn't been a request to meet unmet needs from Dacorum, however confirm there is no current scope within Buckinghamshire to meet potential unmet needs from the Dacorum area. They also note that there is a need to continue engagement on any education provision implications in the Aylesbury / Tring and Chesham / Bovingdon areas.

3.9.7 General / Other Bodies

- Bidwells is representing Richard Blair of Flamsteadbury Farm in Redbourn, with small areas within Dacorum Borough, requesting that it be released from the Green Belt so it can assist in the delivery of housing.
- Pegasus Group on behalf of Pennard Bare Trust submit Land West of Redbourn to this Local Plan consultation and Call for Sites process (this site is included as a draft allocation within the St Albans City and District Local Plan). The landholding includes a triangular parcel (0.17 hectares) to the West of Redbourn and to the East of the M1 Motorway which falls within the boundary of Dacorum Borough Council as shown on

the submitted Site Location Plan. They state that this site is capable of supporting both SADC and DBC in addressing local housing needs.

3.9.8 Wider Community

Key issues raised by the wider community include:

- General concerns raised by the wider community relate to the provision of infrastructure, particularly hospital, GP, roads, education and dental services.
- A number of comments made reference to the loss of green space and questioned the impact of development on wildlife, landscape. The Chilterns AONB and Ashridge.
- There were also concerns raised with regards to coalescence of settlements and a loss of settlement identity – primarily relating to Leverstock Green.
- Concerns were raised with regards to housing affordability in the area.
- Raised a need for more leisure and sports provision.

3.10 Infrastructure

3.10.1 Respondents were given the option to select up to 5 infrastructure priorities for the Local Plan.

3.10.2 398 Respondents (29.6%) responded to this question, including 12 postal responses.

3.10.3 Overall, the top five priorities were:

1)	Healthcare	290	21.4%
2)	Green space and play	251	18.5%
3)	The road network	209	15.4%
4)	Public transport	172	12.7%
5)	Community facilities	163	12.0%

3.10.4 The remainder were:

6)	Education	160	11.8%
7)	Walking & cycling	146	10.8%
8)	Emergency services	118	8.7%
9)	Drainage & flood	115	8.5%
10)	Waste & recycling	76	5.6%
11)	Indoor & outdoor sports	64	4.7%
12)	Arts & culture	43	3.2%
13)	Other*	39	2.9%
14)	Digital communications	29	1.7%

3.10.5 *Other responses included the countryside / Green Belt, Homes, Employment provision, Allotments, Renewable energy, Water supply, Sewerage, The town centre and retail, Road safety provisions, Historic Environment, Community Heating, Mature hedgerows and trees, Parking, Open Space and Farmland.

3.11 Evidence Base

3.11.1 This question received 76 responses via the online survey. Detailed responses received on the updated evidence studies will be considered by the council and specialists (where applicable) prior to the publication of the Regulation 19 Local Plan.

3.12 Consultation Feedback

3.12.1 233 people (17.2%) gave feedback on the survey and consultation platform, “Let’s Talk Dacorum”.

Ease of finding information on the consultation webpages:

Very Poor	Poor	Adequate	Good	Very Good	N/A
18%	13.7%	31.3%	26%	9.9%	2.1%

Ease of understanding information on the consultation webpages:

Very Poor	Poor	Adequate	Good	Very Good	N/A
9.4%	16.3%	34.8%	27.9%	9.9%	1.7%

Ease of using maps:

Very Poor	Poor	Adequate	Good	Very Good	N/A
8.2%	11.6%	34.8%	30%	11.2%	4.3%

Accessibility on PC:

Very Poor	Poor	Adequate	Good	Very Good	N/A
6.9%	9.4%	27.9%	24.9%	12%	17.6%

Accessibility on mobile:

Very Poor	Poor	Adequate	Good	Very Good	N/A
11.6%	6.9%	24.5%	12%	9%	35.2%

Respondents were also asked how they heard about the consultation.

Social Media	80
Other	57
Received an email from the Council	54
Dacorum Life (digital) e-newsletter	10
Read about it in the press	9
Received a letter from the Council	5
Saw a publicity poster	4
Council’s website	4

Total responses: 223 (17% of total respondents).

Social media was the most common way respondents heard about this consultation, based on the data received in this survey, with over one third of respondents (36%) reporting. Almost a quarter of respondents (24%) responded after receiving a notification email from Dacorum Borough Council.

3.13 Call for Sites

3.13.1 This question received 46 responses via the online survey, with:

- a. 21 sites promoted for public open space/suitable alternative natural green space;
- b. 25 sites promoted for housing;
- c. 4 for employment;
- d. 3 for gypsy and traveller site; and
- e. 14 for 'other' including but not limited to:
 - Care home and age restricted accommodation
 - Sports hub
 - Small scale retail and leisure / alternative employment uses not appropriate for traditional employment areas.
 - Education facilities
 - Truckstop expansion
 - Battery Storage / PV/Solar farm
 - Mixed use new settlement including: housing, a rural enterprise hub, primary school, community uses and public open space.

3.13.2 However, as many respondents used the main survey (question 3 and 4) to promote land for development also, responses to this question have been considered within their respective settlement (sections 3.1-3.9 of this document) for the purposes of summarising to ensure consistency.

4. Next Steps

The Council has reviewed all representations made, and summarised the key issues raised to the Revised Strategy for Growth public consultation.

The Council will undertake the following tasks as a result:

- Consider if further changes need to be made to the revised strategy in light of comments received, taking account of updated evidence on housing, employment and other identified needs for the Borough;
- Update its wider evidence base as appropriate to the key issues raised;
- Consider if any additional evidence is needed to inform the pre-submission version of the Local Plan;
- Review and update the suite of policies that were consulted on in through the Emerging Strategy for Growth consultation held in 2020/21, taking account of relevant feedback received at that time as well as through the Revised Strategy for Growth;
- Engage with infrastructure providers to clearly define the requirements needed to support growth across the borough, to inform an updated Infrastructure Delivery Plan; and
- Engage with members through the “Task and Finish” group on the key issues raised and how these will inform the pre-submission version of the Local Plan.

A pre-submission version of the Local Plan will be published in October 2024, for submission by mid-2025. This will be accompanied by the Council’s response to key issues raised and how this has informed the final version of the Local Plan.

Appendix A: Supporting Information

Digital

Figure 1: Consultation Portal

The online consultation portal can be viewed here:

<https://letstalk.dacorum.gov.uk/hub-page/localplan2023>

Notification

Figure 2: Email Notification from Engagement HQ.

[NEW CONSULTATION ON THE DACORUM LOCAL PLAN \(2024-2040\) – REVISED STRATEGY FOR GROWTH](#)

This notification is provided in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004.

What is the consultation about?

Dacorum Borough Council is consulting on the next stage of the Dacorum Local Plan 2024-2040. This focused consultation, called "Revised Strategy for Growth", responds to key issues raised by communities during late 2020 and early 2021. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations Development Plan Document (DPD) and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal. The Council is also running a 'Call for Sites' as part of this consultation, focused on identifying new public open spaces in the Borough.

When can I comment?

The Council is inviting comments on the Revised Strategy for Growth, from 12 pm on Monday 30 October 2023. Comments must be received before 11:59 pm on Monday 11th December 2023.

How do I have my say?

We would request you submit your comments online via letstalk.dacorum.gov.uk

If this is not possible, you can also respond by post (see address below). The survey can be downloaded and printed from www.dacorum.gov.uk/localplan

Please note we will be unable to accept written comments provided without a name and an address. All comments received to this consultation will be made public and cannot be treated anonymously.

Where can I view the consultation?

All information and documents relating to the consultation are available to view on our new consultation portal: letstalk.dacorum.gov.uk

A printable version of the consultation document and the sustainability appraisal is also viewable as a hard copy at:

- Borough Council offices during [normal opening hours](#):
 - The Forum, Hemel Hempstead, HP1 1DN
 - Berkhamsted Civic Centre, HP4 3HB
 - Victoria Hall, Tring, HP23 6AA
- All public libraries within the Borough during [normal opening hours](#).

Where can I speak to officers about the Local Plan?

You can ask the team questions online at Let's Talk Dacorum. Officers will also be attending the following public events during the consultation period:

- Hemel Hempstead Christmas Lights switch-on (Marlowes): Saturday, 18 November 2023
- Tring Christmas Festival (Victoria Hall): Saturday, 25 November 2023
- Berkhamsted Festival of Light (Berkhamsted High Street): Sunday, 26 November 2023

Further information

Please contact the Strategic Planning team if you have any questions or require more information via letstalk.dacorum.gov.uk.

Yours sincerely,

Sara Whelan
Assistant Director for Planning
Dacorum Borough Council

Figure 3: Notification Letter sent by Post.

Date: 30/10/2023
Your Ref:
Our Ref: Dacorum Local Plan 2023
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Direct line: 01442 228000



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



Dear [REDACTED],

NEW CONSULTATION ON THE DACORUM LOCAL PLAN (2024-2040) – REVISED STRATEGY FOR GROWTH

This letter is provided in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004.

What is the consultation about?

Dacorum Borough Council is consulting on the next stage of the Dacorum Local Plan 2024-2040. This focussed consultation, called "Revised Strategy for Growth", responds to key issues raised by communities during late 2020 and early 2021. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations Development Plan Document (DPD) and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal. The Council is also running a 'Call for Sites' as part of this consultation, focussed on identifying new public open spaces in the Borough.

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Where can I view the consultation?

All information and documents relating to the consultation are available to view on our new consultation portal: letstalk.dacorum.gov.uk

A printable version of the consultation document and the sustainability appraisal is also viewable as a hard copy (during normal opening hours) at:

- Borough Council offices
Opening times: <https://www.dacorum.gov.uk/home/do-it-online/contact-us>
 - The Forum, Hemel Hempstead, HP1 1DN
 - Berkhamsted Civic Centre, HP4 3HB
 - Victoria Hall, Tring, HP23 8AA
- All public libraries within the Borough
Opening times: www.hertfordshire.gov.uk/services/Libraries-and-archives/Library-opening-hours/Library-opening-hours-and-locations.aspx

Where can I speak to officers about the Local Plan?

You can ask the team questions online at Let's Talk Dacorum. Officers will also be attending the following public events during the consultation period:

- Hemel Hempstead Christmas Lights switch-on (Marlowes): Saturday, 18 November 2023
- Tring Christmas Festival (Victoria Hall): Saturday, 25 November 2023
- Berkhamsted Festival of Light (Berkhamsted High Street): Sunday, 26 November 2023

Further information

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

Email: strategic.planning@dacorum.gov.uk
Phone: 01442 228000
Address: Strategic Planning, Dacorum Borough Council, the Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN.

Yours sincerely,



Sara Whelan
Assistant Director for Planning
Dacorum Borough Council



100% recycled paper

Figure 4: Notification sent to Town and Parish Councils in the Borough.

Dear Town/Parish Clerk,

NEW CONSULTATION ON THE DACORUM LOCAL PLAN (2024-2040) – REVISED STRATEGY FOR GROWTH

This notification is provided in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004.

What is the consultation about?

Dacorum Borough Council is consulting on the next stage of the Dacorum Local Plan 2024-2040. This focused consultation, called "Revised Strategy for Growth", responds to key issues raised by communities during late 2020 and early 2021. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations Development Plan Document (DPD) and the 'saved' policies from the 2004 Local Plan.

Other supporting documents and evidence are also available, including a Sustainability Appraisal. The Council is also running a 'Call for Sites' as part of this consultation, focused on identifying new public open spaces in the Borough.

When can I comment?

The Council is inviting comments on the Revised Strategy for Growth, from 12pm on Monday 30 October 2023. **Comments must be received before 11:59pm on Monday 11th December 2023.**

How do I have my say?

We would request you submit your comments online via letstalk.dacorum.gov.uk.

If this is not possible, you can also respond by post (see address below). The survey can be downloaded and printed from www.dacorum.gov.uk/localplan.

Please note we will be unable to accept written comments provided without a name and an address. All comments received to this consultation will be made public and cannot be treated anonymously.

Where can I view the consultation?

All information and documents relating to the consultation are available to view on our new consultation portal: letstalk.dacorum.gov.uk.

A printable version of the consultation document and the sustainability appraisal is also viewable as a hard copy (during normal opening hours) at:

- Borough Council offices
 - Opening times: <https://www.dacorum.gov.uk/home/do-it-online/contact-us>
 - The Forum, Hemel Hempstead, HP1 1DN
 - Berkhamsted Civic Centre, HP4 3HB
 - Victoria Hall, Tring, HP23 6AA

- All public libraries within the Borough

Opening times: www.hertfordshire.gov.uk/services/libraries-and-archives/library-opening-hours/library-opening-hours-and-locations.aspx

Hard copies of the printable version of the consultation document and the sustainability appraisal will be delivered to all Town and Parish Councils in the Borough to be held as reference copies.

Where can I speak to officers about the Local Plan?

You can ask the team questions online at Let's Talk Dacorum. Officers will also be attending the following public events during the consultation period:

- Hemel Hempstead Christmas Lights switch-on (Marlowes): Saturday, 18 November 2023
- Tring Christmas Festival (Victoria Hall): Saturday, 25 November 2023
- Berkhamsted Festival of Light (Berkhamsted High Street): Sunday, 26 November 2023

Further information

Please contact the Strategic Planning team if you have any questions or require more information.

Yours sincerely,

Sara Whelan
Assistant Director for Planning
Dacorum Borough Council

Public Notice

Figure 5: Front Page of Hemel Hempstead Gazette & Express, 30/10/2023

Gazette & Express

hemeltoday.co.uk Visit us online for breaking news

Serving Hemel Hempstead, Berkhamsted & Tring since 1858

Wednesday, November 1, 2023 £1.50

WIN
a Peaky Blinders weekend
in the Black Country

PLUS!
CLAIM A VISUAL
COMPANION
BOOKLET

SEE
INSIDE
FOR
DETAILS



Cllr Simy Dhyani and tenant Linda James cut the ribbon at the official opening of the Wiltone development. Image submitted.

New homes

Six new council homes have been welcomed with a ribbon-cutting ceremony

The two and three-bedroom houses will be provided for social rent and come with energy saving measures to cut household bills

PAGE 15

News



Pickleball star claims bronze PAGE 3

News



Debut novel from Hemel man PAGE 13

Lady Gardeners

Call Kelly today for a free quote.

All aspects of gardening, landscaping and fencing work carried out. Weeding, Digging, Pruning, Grass Cutting, Hedges Trimmed, Trees Pruned, Jungles Cleared & All rubbish taken away.

Call: 07747 510546 or 01582 809576

LADY LANDSCAPES

Call Kelly today for a free quote.

• DECKING • FENCING • GRAVEL/SHINGLE
• TURFING • PATIOS • JET WASHING • GARDEN DESIGN

Call: 07747 510546 or 01908 887 295

ALL ASPECTS OF LANDSCAPING AND TREE WORK UNDERTAKEN

Figure 6: Public Notice in the Hemel Hempstead Gazette & Express Newspaper.

10 | GAZETTE

PUBLIC NOTICES

PLANNING NOTICES




**Dacorum Local Plan
2024-2040**

**Revised Strategy
for Growth**

Notice of Public Consultation

**This notice is provided in accordance with
Regulation 18 of the
Town and Country Planning
(Local Planning) (England) (Amendment)
Regulations 2012 and the
Environmental Assessment of
Plans and Programmes Regulations 2004.**

What is the consultation about?

Dacorum Borough Council is consulting on the next stage of the Dacorum Local Plan 2024-2040. This focussed consultation, called 'Revised Strategy for Growth', responds to key issues raised by communities during late 2020 and early 2021. Once adopted, the new Local Plan will replace the Core Strategy and Site Allocations Development Plan Document (DPD) and the 'saved' policies from the 2004 Local Plan.

To find out more please visit www.dacorum.gov.uk/localplan or letstalk@dacorum.gov.uk.



When can I comment?

The Council is inviting comments on the Revised Strategy for Growth, between 12pm on **Monday 30th October 2023** and 11:59pm on **Monday 11th December 2023**.

Where can I view the consultation?

All information, documents and survey relating to the consultation are available:

- to view online on **Let's Talk Dacorum** letstalk.dacorum.gov.uk
- hard copies are available to view (during normal opening hours) at:
 - o Borough Council offices in the borough (during normal opening hours)
 - o Public libraries within the borough

<https://www.dacorum.gov.uk/home/do-it-online/contact-us>
www.hertfordshire.gov.uk/services/Libraries-and-archives/Library-opening-hours/Library-opening-hours-and-locations.aspx

How do I have my say?

We would request you submit your comments through our new online engagement portal, **Let's Talk Dacorum**. Alternatively, completed surveys can be submitted by post (see 'Further Information' below).

Where can I speak to officers about the Local Plan?

You can ask the team questions online at **Let's Talk Dacorum**. Officers will also be attending the following public events during the consultation period:

- Saturday, 18 November 2023 – Hemel Hempstead Christmas Lights switch-on
- Saturday, 25 November 2023 – Tring Christmas Festival (Victoria Hall)
- Sunday, 26 November 2023 – Berkhamsted Festival of Light

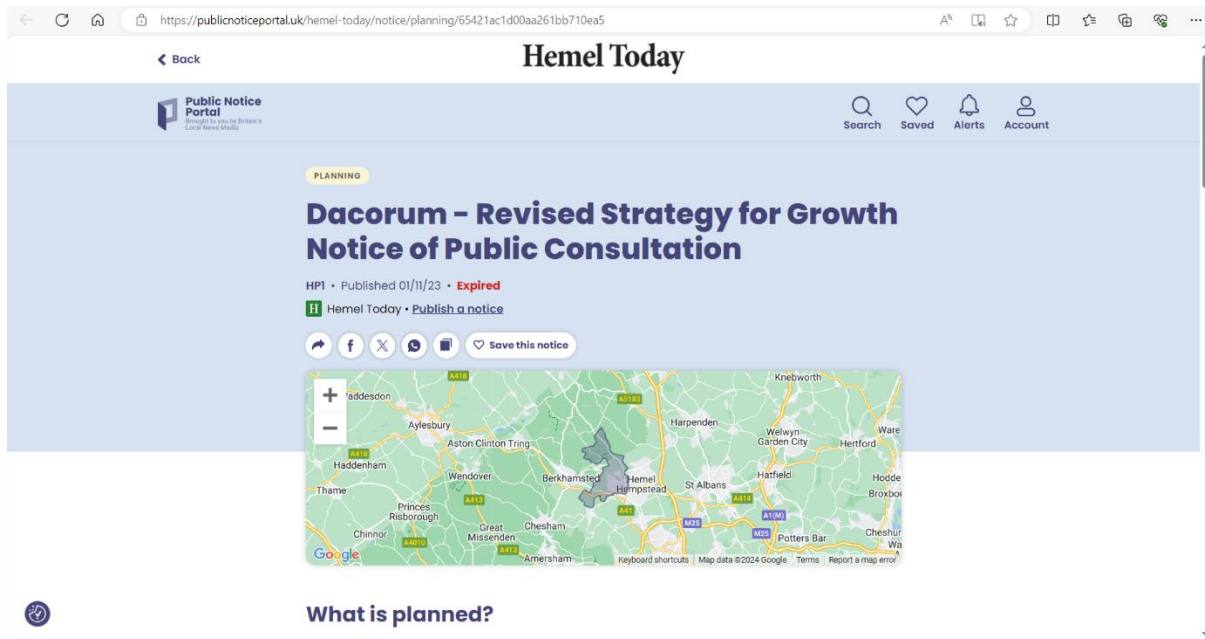
Further information

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

Email: strategic.planning@dacorum.gov.uk
 Phone: 01442 228000

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

Figure 7: Public Notice on the Hemel Today online news, published 30th October 2022. The full text of the notice is viewable on the public notices web page.⁷





⁷ <https://www.hemeltoday.co.uk/public-notice>
<https://publicnoticeportal.uk/hemel-today/notice/planning/65421ac1d00aa261bb710ea5>

Publications

Figure 8: 'Dacorum Life' Digital Newsletter Article

Hard Copy Documents

Figure 9: Survey form

 <p>Dacorum Local Plan Revised Strategy for Growth 2024-2040</p> <p>Consultation Survey form</p>	 <p>Shaping growth in Dacorum</p>
---	--

*Please return to Dacorum Borough Council, by 23:59pm Monday 11 December 2023
Comments received after this time will not be considered.*

By online engagement platform: if you have internet access, it is recommended that you make your representations online at:

<https://letstalk.dacorum.gov.uk>

Alternatively you can respond by completing this form and returning by post to:

Strategic Planning and Regeneration, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Herts HP1 1DN

We will not accept comments made by email.

If you have any queries, please contact the Strategic Planning Team on 01442 228000.

This survey needs to be read in conjunction with the Revised Strategy for Growth 2024-2040 consultation documents.

You do not need to answer every question - just 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	<input type="text"/>		<input type="text"/>
Name*	<input type="text"/>		<input type="text"/>
Organisation	<input type="text"/>		<input type="text"/>
Address *	<input type="text"/>		<input type="text"/>
Post Code *	<input type="text"/>		<input type="text"/>
Telephone No.	<input type="text"/>		<input type="text"/>
Email	<input type="text"/>		<input type="text"/>

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

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

Local Plan Revised Strategy for Growth 2024-2040

Question 1: Where does your response relate to?

(Please tick all that apply)

<input type="checkbox"/>	Hemel Hempstead
<input type="checkbox"/>	Berkhamsted
<input type="checkbox"/>	Tring
<input type="checkbox"/>	Bovingdon
<input type="checkbox"/>	Kings Langley
<input type="checkbox"/>	Markyate
<input type="checkbox"/>	Dacorum's Countryside
<input type="checkbox"/>	Dacorum (whole of borough)
<input type="checkbox"/>	Other (please specify below):

Local Plan Revised Strategy for Growth 2024-2040

Overall feedback on changes to the strategy

Question 2: To what extent do you agree or disagree with the proposed changes to the strategy?

(Please select one answer)

<input type="checkbox"/> Agree	<input type="checkbox"/> Somewhat agree	<input type="checkbox"/> Neutral	<input type="checkbox"/> Somewhat disagree	<input type="checkbox"/> Disagree
--------------------------------	---	----------------------------------	--	-----------------------------------

Please use this space if you would like to provide further overall feedback on the proposed changes.

(Please enclose any supporting documents you wish to add)

Local Plan Emerging Strategy for Growth 2020-2038

Infrastructure

Question 3: When thinking about the future what are the five most important things to you?

(Please select up to five options)

<input type="checkbox"/>	Arts and culture
<input type="checkbox"/>	Community facilities (including libraries, village halls, youth groups and social care)
<input type="checkbox"/>	Digital communications (broadband, etc.)
<input type="checkbox"/>	Drainage and flood protection
<input type="checkbox"/>	Education provision (including early years, primary and secondary, and SEND)
<input type="checkbox"/>	Emergency services (including police, fire, and ambulance)
<input type="checkbox"/>	Green space and play facilities
<input type="checkbox"/>	Healthcare (including GP provision, hospital care and mental health services)
<input type="checkbox"/>	Homes and jobs
<input type="checkbox"/>	Indoor and outdoor sports facilities
<input type="checkbox"/>	Public transport (including buses and trains)
<input type="checkbox"/>	Road network
<input type="checkbox"/>	Walking and cycling routes
<input type="checkbox"/>	Waste and recycling
<input type="checkbox"/>	Other (please specify below)

Local Plan Emerging Strategy for Growth 2020-2038

Evidence Base

Question 4: What evidence would you like to comment on?

(Please tick all that apply)

<input type="checkbox"/>	Sustainability Appraisal
<input type="checkbox"/>	Habitats Regulations Assessment
<input type="checkbox"/>	Strategic Housing Land Availability Assessment ("SHLAA")
<input type="checkbox"/>	Viability Study
<input type="checkbox"/>	Hemel Garden Communities Position Statement

What comments would you like to make on the selected evidence?

Local Plan Emerging Strategy for Growth 2020-2038

Feedback on Consultation Process

Question 5: How did you hear about this consultation?

(please select the main way you heard)

<input type="checkbox"/>	Read about it in Dacorum Life (digital) - weekly e-newsletter
<input type="checkbox"/>	Read about it in the press
<input type="checkbox"/>	Received a letter from the Council
<input type="checkbox"/>	Received an email from the Council
<input type="checkbox"/>	Saw a publicity poster
<input type="checkbox"/>	Saw it on the Council's website
<input type="checkbox"/>	Social media
<input type="checkbox"/>	Other (please specify below)

Question 6: Please rate your experience of taking part in this consultation.

	Very good	Good	Adequate	Poor	Very poor	N/A
Ease of finding information on the consultation webpages						
Ease of understanding the information provided						
Ease of using the maps						
Accessibility of the consultation on your pc						
Accessibility of the consultation on your mobile						

Local Plan Emerging Strategy for Growth 2020-2038

Call for Sites

If you are looking to promote land for development in Dacorum and want to see it allocated in the new Local Plan, please submit your information below.

At present, the Council is putting a specific call out for **Suitable Alternative Natural Greenspace**, or "**SANG**" for short. This is the term given to greenspaces that are created or enhanced with the specific purpose of absorbing recreation pressure that would otherwise occur at National Sites, such as Ashridge Commons and Woods SSSI (i.e. Ashridge Estate). New SANGs can be created, or existing greenspaces enhanced to create a SANG, in order to absorb the level of additional recreation pressure associated with new development.

Further information is available at [https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/chilterns-beechwoods-special-area-of-conservation/chilterns-beechwoods-special-area-of-conservation-\(sac\)-mitigation-strategy](https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/chilterns-beechwoods-special-area-of-conservation/chilterns-beechwoods-special-area-of-conservation-(sac)-mitigation-strategy)

A good SANG should include the following key principles:

- Agricultural land / woodland / other natural spaces which has the potential to be converted into high quality public open space.
- It must be capable of delivering a 2.4-kilometre circular walking route that does not cross over itself.
- It should be very 'natural' in its feel, with limited built development (i.e. houses or other buildings) visible from within the land.
- It must be secured for a period of at least 80 years.

What would you like to promote the site for? (tick all that apply)

(Please provide a map with your site clearly outlined)

<input type="checkbox"/>	Public Open Space / Suitable Alternative Natural Green Space
<input type="checkbox"/>	Housing
<input type="checkbox"/>	Employment
<input type="checkbox"/>	Retail
<input type="checkbox"/>	Gypsy and Traveller Site
<input type="checkbox"/>	Other (please specify below):
Location / Address of the site:	

Local Plan Emerging Strategy for Growth 2020-2038

Please provide any further information you wish to add.

(Please enclose any supporting documents you wish to add)



Appendix B: Full Text of Responses

You can view all responses made on the consultation webpage, by visiting our consultation portal: https://letstalk.dacorum.gov.uk/survey_localplan2023⁸

- To view the full text to all responses made: [Revised Strategy for Growth Consultation - Report of Responses](#) (22.4 mb)
- To view full copies of postal responses and supporting documents please see [Annex 1 to the main report](#). (19.4 mb)

8

Please note that responses made to the consultation cannot be amended within the online system.