# Site Allocations
# Report of Representations
## Part 1

**Contains:**

- **Main Report**
- **Annex A: Method of Notification**

**July 2015**

***DRAFT FOR CONSIDERATION BY CABINET***

This publication is **Part 1 of the Report of Representations for the Pre-Submission Site Allocations.** It contains a summary of the consultation process and discusses the main issues raised.

Part 2 comprises Annex B of the Report of Representations: it contains the results of the consultation on the Pre-Submission Site Allocations.

**Obtaining this information in other formats:**

- If you would like this information in any other language, please contact us.
- If you would like this information in another format, such as large print or audiotape, please contact us

at strategic.planning@dacorum.gov.uk or 01442 228660.

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**(a) List of those making No Comment**

**(b) List of those making comments on the Sustainability Appraisal and Strategic Environmental Assessment**

## 1. INTRODUCTION

**Background:**

1.1 The Core Strategy DPD was adopted in 2013, and forms the first part of the Local Planning Framework (LPF) for the Borough. The Site Allocations is the second LPF document. It is the 'delivery' document for the Core Strategy: focussing on the delineation of site boundaries and designations, and setting out planning requirements for new development. It does not cover the Maylands Business Park as this area is to form part a separate East Hemel Hempstead Area Action Plan (AAP).

Reports of Consultation:

1.2 Consultation on the Site Allocations started in 2006 on the 'issues and options' and there have been several milestones in preparing the Site Allocations since then. The Report of Consultation is published in three volumes. The first covers the 2006 consultation, the second the 2008 consultation and the third the period from 2008 to summer 2014 when the Pre-Submission document was published.

1.3 The Reports of Consultation outline:

- The key stages in public consultation on the Site Allocations;
- The weight given to consultation feedback;
- The legal and policy influences, which affected consultation about the Site Allocations; and
- The key issues and outcomes, explaining progress up to the publication of the Pre-Submission document.

1.4 It also explained how the consultation related to the Council's policy on consultation and engagement: the Statement of Community Involvement (SCI).

1.5 The Consultation Reports are available online:

Volume 1:
http://www.dacorum.gov.uk/docs/default-source/planning-development/spar-12.07.27-siteallocationsio2006responsesummary-v3.pdf?Status=Master&sfvrsn=0

Volume 2:
http://www.dacorum.gov.uk/docs/default-source/strategic-planning/site-allocations-consultation-report-vol-2-november-2008.pdf?sfvrsn=0

Volume 3:

http://www.dacorum.gov.uk/docs/default-source/strategic-planning/site-allocations-consultation-report-vol-3-september-2014.pdf?sfvrsn=0

1.6 The Consultation Reports, together with the Reports of Representation prepared for the Core Strategy are also relevant, as the Site Allocations document is a delivery document for the principles set out in the Core Strategy:

http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/core-strategy/core-strategy-examination-2012/submission-documents

Sustainability Appraisal:

1.7 Sustainability Working Notes have been prepared to accompany each iteration of the emerging Site Allocations document, with a draft Sustainability Appraisal Report accompanying the Pre-Submission Site Allocations DPD:

http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-2014

1.8 Comments made regarding the sustainability appraisal process (which incorporates Strategic Environmental Assessment (SEA), are highlighted in the relevant Consultation Report and in this Report of Representations (Part 2: Annex B, Table 5).

Report of Representations

*Legal Background:*

1.14 The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 prescribed the process for the Pre-Submission Site Allocations. On 6 April 2012 these regulations were superseded by the Town and Country Planning (Local Planning) (England) Regulations 2012. The new regulations prescribe the process for the submission on the Site Allocations DPD to the Secretary of State, its examination and adoption.

*Pre-Submission Consultation Procedures*

1.15 Dacorum's Pre-Submission Site Allocations DPD was published for representations for a 6 week period between 24th September and 5th November 2014.

1.16 Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 required the Council to:

- publicise the Pre-Submission Site Allocations; advertise the representations procedure and the availability of the availability of the document;
- make the Pre-Submission Site Allocations DPD and associated documents available on the Council's website, at the main Council office and other places the Council considered appropriate; and
- contact the consultation bodies notified under Regulation 25.

1.17 Consultation bodies comprised specific consultation bodies listed in the regulations and general consultation bodies. A statement of the representations procedure was sent to all the consultation bodies (Appendices 1 and 5).

1.18 Any person could make representations on the Pre-Submission Site Allocations DPD and associated Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), provided the representations were sent to the Council (at Hemel Hempstead) within the specified 6 week time period (Regulation 28).

1.19 As written, Regulation 29 requires the Council to request the opinion of the Secretary of State (for Communities and Local Government) as the 'general conformity' of the Site Allocations with the Regional Spatial Strategy (i.e. the east of England Plan). However, this requirement has been removed by Schedule 5 paragraph 15(5) of the Local Democracy, Economic Development and Construction Act 2009.

*Submission:*

1.20 Regulation 22 (Town and Country Planning (Local Planning) (England) Regulations 2012) requires the Council to prepare a statement setting out whether representations were received or not. Assuming representations are made, the statement should record the number and a summary of the main issues. The Council has called this statement the Report of Representations.

1.21 The Report of Representations should be published at the same time the Site Allocations is submitted to the Secretary of State for examination. The Report of Representations is also submitted to the Secretary of State then.

1.22 The Report of Representations is one of a number of "submission documents", together with the Site Allocations DPD itself, the sustainability appraisal, the Report of Consultation and other supporting documents.

*What happened:*

1.23 The Site Allocations was published on 24th September 2014 at a stage known as "Pre-Submission".

1.24 The Pre-Submission version of the Site Allocations DPD set out the Council's proposed planning policies (i.e. what it wished to adopt as the Site Allocations). It comprised a written statement together with a Map Book setting out changes to the Dacorum Borough Local Plan (1991-2011) Proposals Map.

1.25 Like the Core Strategy the Site Allocations document it is divided into four main sections:

1. *The Sustainable Development Strategy* – covering issues such as revisions to the boundaries of the Green Belt, transport proposals, and the definition of Major Development Sites in the Green Belt and Mixed Use proposals.
2. *Strengthening Economic Prosperity* – setting out General Employment Area and retail designations, together with revised retail frontages for the three towns.
3. *Providing Homes and Community* Services – comprising the housing schedule, policies for the six Local Allocations and designations relating to leisure and social and community uses.
4. *Looking After the Environment* – covering historic heritage and wildlife designations.

1.26 There are also summaries of all the proposals and designations geographically (via a continuation of the 'Place Strategy' approach), plus a short section on Monitoring and Review.

1.27 This report – the Report of Representations – contains:

- a record of the publicity given to the Pre-Submission consultation, including a list of organisations (or consultation bodies) notified;
- a statement of the number of representations received on the Pre-Submission document and associated SA/SEA;
- a summary of the main issues raised by these representations and the Council's response to these issues; and
- a summary of the proposed amendments as a result of the above.

## 2. THE COUNCIL'S APPROACH

2.1 The Council set out its approach to the Pre-Submission stage when Cabinet approved the Site Allocations on 24 June 2014 (see report in Appendix 6). These procedures were endorsed at a meeting on Full Council on 9th July 2014 (see Appendix 6).

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| Recommendations | That Cabinet:<br><br>1. Note key issues arising from Issues and Options Consultation, the Core Strategy and new information and advice.<br>2. Recommend the Site Allocations Pre-Submission documents to Council for publication and comment.<br>3. Recommends Council delegate authority to the Assistant Director (Planning Development and Regeneration) in consultation with the Planning and Regeneration Portfolio Holder to finalise the Report of Consultation and Sustainability Appraisal, to make any factual or non-substantive changes and amendments to the Pre-Submission Site Allocations and to insert the Indicative Spatial Layout plan into Policy LA3 West Hemel Hempstead prior to consultation commencing.<br>4. To recommend Council to approve the Site Allocations for publication, seeking representations in accordance with the Statement of Community Involvement and relevant regulations.<br>5. To recommend Council to approve the following procedure for considering future issues on the Site Allocations:<br>(a) If significant new issues are raised in the representations on the forthcoming consultation, to report to Cabinet and Council for a decision as to whether any change to the Site Allocations is justified;<br>(b) If there are no significant new issues, to delegate authority to the Assistant Director (Planning, Development and Regeneration) to:<br>(i) Submit the Site Allocations for Examination; and<br>(ii) In consultation with the Planning and Regeneration Portfolio Holder, to agree any minor changes to the Site Allocations to resolve objections and improve clarity of the document. |

*Source: 24th June 2014 Cabinet Report*

2.2 In terms of internal processes for dealing with representations, this is summarised as follows:

1 Officers validated representations (whether submitted by post, email or via the consultation portal);

2 Officers summarised valid representations and assessed them to see whether any new issues were raised;

3 Officers highlighted these new issues and indicated whether these were considered significant or not;

4 If any significant changes are required to the Site Allocations DPD in the light of comments received, then these would be published for representations;
5 In no significant new issues are raised and no significant changes proposed, then the Site Allocations DPD would be submitted to the Secretary of State for examination.

2.3 Validation of representations required checks to ensure that:

- The representation was received before the deadline;
- It was related to the Site Allocations and referred to a planning matter; and
- Was not inappropriate or offensive.

## 3. NOTIFICATION AND PUBLICITY

3.1 The Pre-submission stage was a formal one, designed to allow for representations about the soundness of the changes proposed to the Site Allocations.

3.2 The approach satisfied the intention set out in the Statement of Community Involvement. Under 'Submission to the Secretary of State' (in that document), the Council said it would use the following techniques of consultation:

- press release
- formal notice in local paper(s)
- Reference copies of documents available at deposit points and local libraries
- Information available on the Council's website,
- Letters / emails to all statutory consultation bodies, adjoining local planning authorities, town and parish councils and individuals and organisations on the Council's Local Plan database.
- Articles in Dacorum Digest (if publication dates allow).

### Consultation

3.3 The consultation was announced by a local advertisement, by notification on the Council's web site and by direct notification.

3.4 The advert, which comprised the Statement of Representations Procedure (Annex A: Appendix 1) appeared in both The Gazette and St Albans Review on 24th September 2014.

3.5 Stakeholders and representative groups were directly notified on 22 and 23 September 2014 (see Annex A: Appendix 4 for a distribution list and a list of consultation bodies notified). Sample copies of the letters, memos and emails are contained as Annex A: Appendix 5. Individuals who had previously commented or who had requested to be notified were also contacted. This notification amounted to around 3,000 people or organisations. Each notification was accompanied by a notice with a Statement of Representations Procedure (see Annex A: Appendix 1). The Dacorum Digest was also distributed to every household in the Borough during September 2014 (see Appendix 2).

3.6 All information was available on the Council's website at www.dacorum.gov.uk/siteallocations – including a link to the consultation portal on the homepage – and from Council offices and local libraries.

3.7 Whilst public exhibitions are not a requirement of the Statement of Community Involvement (SCI) for the Pre-Submission Stage, Officers were available at a series of public exhibitions between 13-17 October 2014 to answer questions. The timetable of exhibitions was as follows:

| Date/Time | Area | Venue | Specific focus On |
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| Monday 13 October | Hemel Hempstead | Dacorum Borough Council, Civic Centre, | Site Allocations consultation and |

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| 2-8pm | | Marlowes | Local Allocations LA1, LA2 and LA3 |
| | Bovingdon | Bovingdon Football Club, Green Lane | Site Allocations consultation and Local Allocation LA6 |
| Tuesday 14 October 2-8pm | Tring | Temperance Hall, Christchurch Road | Site Allocations consultation and Local Allocation LA5 |
| Wednesday 15 October 2-8pm | Berkhamsted | Main Hall, Civic Centre, High Street | Site Allocations consultation and Local Allocation LA4 |
| Friday 17 October 2-8pm | Hemel Hempstead | Warners End Community Centre, Northridge Way | Site Allocations consultation and Local Allocation LA3 |
| Thursday 23 October 2-8pm | Hemel Hempstead | Grovehill Community Centre, Henry Wells Square | Site Allocations consultation and Local Allocation LA1 |

3.4 Attendance at the sessions was generally good, with the exhibition at Tring extremely well attended. Examples of the exhibition material are attached in Appendix 3.

3.5 In addition to the exhibitions, Officers from Dacorum Borough Council and a representative from the Highway Authority also attended a specially convened meeting of Tring Town Council on Monday 3rd November 2014 at Victoria Hall, Tring to answer questions from Town Councillors and members of the public relating to Local Allocation LA5: Icknield Way. This meeting was attended by approximately 200 residents, together with members of the Town Council. Minutes from this meeting are attached in Annex A: Appendix 7.

## 4. RESULTS

### Nature of Comments

4.1 In total 294 representations were received, from 113 different groups / individuals.

4.2 119 were in support, whilst 172 were objections.

4.3 A list of the organisations and individuals from whom representations were received is contained as Annex B: Table 1.

4.4 All valid representations were analysed. All were checked to ensure the correct boxes had been completed, in particular to see:

- whether the commenter was supporting or objecting;
- which section of the Site Allocations DPD their representation(s) related to; and
- whether the commenter said the Site Allocations DPD was legally compliant and/or was sound.

4.5 Annex B, Table 2 provides a full statistical breakdown of representations.

4.6 Where the commenter did *not* comment on legal compliance and soundness, the following assumptions were made:

- Supporting representations meant that the Site Allocations was both legally compliant and sound.
- Objections meant that the Site Allocations was unsound (but normally legally compliant).
- If an objector had complained about the process, he/she felt the Site Allocations was not legally compliant.

4.7 Reasons for lack of soundness are recorded in Table 2: i.e.

- not justified,
- not effective,
- not consistent with national policy, and/or
- not positively prepared.

4.8 Sometimes more than one reason was given. However where a commenter did not give reasons, their objection was recorded as “commenting” in Table 2 (in Annex B).

4.9 All valid representations have been made available for inspection on the Council’s website (electronic copies) and at the Civic Centre in Hemel Hempstead (paper copies).

4.10 In addition there were:

- 2 submissions saying ‘no comment’ and/or providing information for reference by the Council (see Annex B, Table 5);
- 3 submissions (Natural England; Hertfordshire County Council Ecology Officer and Boyer Planning on behalf of W. Lamb Ltd) commenting on the

Sustainability Appraisal (SA) and/or Strategic Environmental Assessment (SEA) (see Annex B, Table 5).

## 5. SUMMARY OF THE MAIN ISSUES

5.1 Many of the comments received to the Site Allocations DPD related to strategic matters already dealt with through the Core Strategy rather than matters pertinent to the Site Allocations DPD itself. Such matters included issues relating to:

- the Council's overall planning strategy;
- overall housing numbers and their spatial distribution;
- the approach to Green Belt, especially the designation of the Local Allocations; and
- the need for the Site Allocations DPD to take account of technical work being carried out to inform the early partial review of the Core Strategy.

5.2 A number of residents also suggested there was insufficient publicity relating to the consultation and therefore the process was flawed. The Council disagrees that there was any flaw in the process and points to the extensive consultation and publicity explained in the Reports of Consultation and the notification recorded in this Report of Representations.

5.3 Table 3 (Annex B) sets out the issues raised in plan order. All these issues are being referred to the Planning Inspectorate for Examination. The table also records:

- the nature of the issue, for internal use by the Council (i.e. was it a new issues and/or is it considered to be significant in nature);
- a response; and
- whether the Council wishes to propose a change to address the issue raised.

5.3 Commonly occurring issues, together with the Council's response are summarised in Table A below.

**Table A: Summary of Key Issues Raised and Proposed Response**

| ISSUE | RESPONSE |
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| **(a) Concerns relating to the Site Allocation document and process in general** | |
| Promotion of additional Green Belt housing sites | No change. A number of representations seek to promote additional housing sites within the Green Belt. The Core Strategy considered the need for changes to be made to the Green Belt to accommodate new development and resulted in the designation of six Local Allocations. The Site Allocations formally removes these sites from the Green Belt through changes to the Policies Map. Paragraph 8.29 of the Core Strategy clearly states that *"The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change will be necessary in the Site Allocations DPD, other than to define these locations precisely and correct any minor anomalies that may still exist…. The Council will* |

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| | *only re-evaluate the role and function of the Green Belt when it reviews the Core Strategy (see paragraphs 29.8 to 29.10)."* This is reflected in the text of Policy CS5: Green Belt which states that *"There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted."* This approach was accepted by the Core Strategy Inspector and is reflected in the Site Allocations DPD.<br><br>A full review of the Green Belt is being carried out to inform the early partial review of the Core Strategy, through the production of a new single Local Plan. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan. |
| The Site Allocations should be reviewed in light of new technical work and household growth projections | No change. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan. This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council). These decisions clarify a number of key points, including:<br>• A 'Local Plan' can comprise a series of DPDs. Dacorum's Site Allocations DPD is in-effect a 'daughter document' to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out;<br>• Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area.<br>• The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be.<br>• That in Dacorum's case, housing delivery is only expected to fall short of delivering full OAN in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets.<br><br>In the light of these decisions the approach taken by the Council to the Site Allocations DPD is considered to be both appropriate and legally compliant.<br><br>This is reinforced by the fact that Dacorum's own Core Strategy Inspector was happy with the wording in |

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| | paragraph 29.8 (introduced via a post Examination main modification) that "The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs. Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully." |
| Adequacy of background work to inform approach to open land and leisure designations | No change. The Council considers that all necessary technical work has been completed to inform the approach set out to open land and leisure designations within the Site Allocations DPD. As required by the NPPF, this technical work is proportionate to the nature and complexity of the issues. The majority of this work was prepared to inform the Core Strategy, with some supplementary work carried out specifically to support the Site Allocations. Further detail regarding this technical work is set out in the Providing Home and Community Services Background Issues Paper. |
| **(b) Concerns relating specifically to the Local Allocations** | |
| Object to principle of development of Local Allocations | No change. The Council has taken time and care to identify what are considered, on balance, to be the most appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF). This requires, amongst other things, for Councils to *'positively seek opportunities to meet the development needs of the area'* (para 14); *and 'boost significantly the supply of new housing'* (para 47).<br><br>The decisions made regarding both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector's Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector's main concern when weighing up whether or not to find the Core Strategy 'sound' or not, was if the Council had allocated *sufficient* land for housing, not if any of the Green Belt sites should be removed from the plan.<br><br>The principle of releasing land from the Green Belt and bringing forward this site for housing and associated |

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| | uses has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered. |
| Timing of release of Local Allocations for development | No change. The Core Strategy envisaged all six Local Allocations being delivered from 2021 onwards. Following further consideration of local housing needs and the role the site will play in delivering other essential local infrastructure, the delivery of Local Allocation LA5: Icknield Way, west of Tring has been brought forward into Part 1 of the Schedule of Housing Proposals and Sites. Whilst no specific delivery date has been set, this will follow the formal release of the site from the Green Belt i.e. after adoption of the Site Allocations DPD. The reasons for this earlier release of LA5 are set out in the Meeting Homes and Community Needs Background Issues Paper (June 2015). They include:<br><br>• the role the site will play in ensuring a robust 5 year housing land supply (for both bricks and mortar homes and Gypsy and Traveller pitches);<br>• the benefits of the early delivery of the extension to the Icknield Way General Employment Area;<br>• the benefits of securing land for an extension to Tring cemetery and associated public open space; and<br>• the lack of any infrastructure capacity issues that require site delivery to be delayed until later in the plan period.<br><br>The remaining Local Allocations (i.e. LA1-LA4 and LA6) are included in Part 2 of the Schedule of Housing Proposals and Sites and will bring forward completed homes from 2021 onwards. There have been no significant changes in circumstances since the adoption of the Core Strategy and in consulting on the Site Allocations DPD, to justify bringing forward these allocations sooner. Policy CS3 provides sufficient flexibility for this to happen, if required. No detailed phasing of individual sites is warranted as they vary significantly in size, character, and location, and these factors will naturally regulate their release over time. However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that applications will be received and determined in advance of 2021 and that site construction and works may actually take place ahead of the specified release date to enable occupation of new homes by 2021. This approach is considered to remain appropriate and will |

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| | ensure that the Council can continue to demonstrate a 5 year housing land supply as required by the NPPF. This approach is consistent with the wording of paragraph 6.28 of the Core Strategy. |
| Concerns regarding adequacy of previous public consultation regarding allocation of Local Allocations | No change. This was a matter for consideration by the Core Strategy Planning Inspector. The Core Strategy Inspector's Report was issued in July 2013 and stated that, subject to some modifications, the Core Strategy was 'sound'. An Inspector can only reach this conclusion if they are satisfied that the Council has fulfilled certain tests. The Core Strategy must be prepared in accordance with the "duty to co-operate", legal and procedural requirements, and whether it is sound. Soundness is determined with reference to the tests set out in paragraph 182 of the National Planning Policy Framework – i.e. the Core Strategy must be positively prepared, justified, effective and consistent with national policy. The Inspector was satisfied in all respects. In his report referring to public consultation, he concludes:<br>*"…the requirements of the Statement of Community Involvement (SCI) have been met and the level and nature of the consultation undertaken was appropriate."*<br><br>The Statement of Community Involvement (SCI) is the Council's statement of policy on public consultation for planning document (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has gone beyond the requirements of this SCI, and of consultation requirements set out within Government planning regulation in preparing the Core Strategy and hence establishing the principle of this site. It has also complied with the SCI in preparation of the Site Allocations document and associated master plans.<br><br>A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council's website and their content has been reported to Members at the appropriate time.<br><br>It should be noted that the Council intends to review and update its SCI prior to beginning consultation on its new single Local Plan. |
| Concerns regarding adequacy of current consultation with regard to the Local Allocations | No change. The recent consultation related to the Pre-Submission stage of the Site Allocations DPD (also referred to as the 'Submission' stage). The consultation requirements for this stage are set out in the Statement |

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| | of Community Involvement. The Statement of Community Involvement is the Council's statement of policy on public consultation for planning policy documents (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has gone beyond the requirements of this SCI, and of consultation requirements set out within Government planning regulations, in seeking feedback on the Pre-Submission Site Allocations document (and associated draft masterplans).<br><br>In addition to the consultation mechanisms listed within the SCI (letters to those on our consultation database, press notices, website etc.), a series of public exhibitions were also held to provide an opportunity for residents to ask Officers' and Members' questions about the documents and the sites and proposals they contain. These exhibitions were held mid-way through the 6 week consultation period (which began on 24 September and ended on 5 November). These consultation arrangements were agreed by Cabinet Members in June 2014 and ratified by Full Council in July 2014. |
| Concerns re loss of Green Belt | No change. The principle of removing land from the Green Belt (via the Local Allocations sites) was tested and established through the Core Strategy. The role of the Site Allocations is to take forward this approach and to make the actual changes to the Green Belt boundaries that will enable this development to go ahead.<br><br>When drawing up the Core Strategy the Council had to ensure that it reflected guidance on the Green Belt and other matters set out in the National Planning Policy Framework (NPPF). This was tested as part of the Examination process and the plan found 'sound.'<br><br>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Council's review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy and continues to do through its Site Allocations document.<br><br>The Local Allocations identified within the Core Strategy remain the only housing sites identified for release from |

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| | the Green Belt. |
| Brownfield land, office to residential conversions and previously developed land should be used before releasing Green Belt sites for housing | No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of 'brownfield' sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.<br><br>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be *robust* and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add *flexibility* to the housing programme and add a further safeguard to ensure the target is delivered.<br><br>In preparing the Site Allocations document the Council has looked carefully again at the full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land |

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| | could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).<br><br>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.<br><br>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.<br><br>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained. |
| Promotion of alternative site(s) seen as preferable to Local Allocations | No change. The potential role that other sites could play in meeting Dacorum's housing needs was considered as part of the Core Strategy Examination. This included brownfield sites and other greenfield and Green Belt |

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| | sites. The Inspector supported the choice of Local Allocations proposed by the Council. It is therefore appropriate that it is these sites that are progressed through the Site Allocations process. There have been no significant changes in circumstances since adoption of the Core Strategy and in consulting on the Site Allocations DPD to justify allocating additional or alternative sites. This can more appropriately be considered in preparing the new single Local Plan and considered then against the identified objectively assessed need (OAN). See response to new Green Belt housing sites.<br><br>In terms of the Green Belt and Local Allocations, the Core Strategy also clearly states that *"The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change will be necessary in the Site Allocations DPD, other than to define these locations precisely and correct any minor anomalies that may still exist."* |
| Conflict with NPPF / Government policy and recent ministerial statements on Green Belt | No change. The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area's objectively assessed need.<br><br>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy. A key role of the Site Allocations DPD is to take forward the strategic policies and targets relating to housing within the Core Strategy and ensure that these are delivered on the ground. It is the role of the early partial review (in the form of a new single Local Plan) to look again at longer term needs and take account of a whole range of Government policies and guidance, including those relating to housing and the Green Belt. |

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| | Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to "*significantly boost the housing supply"* (para. 47). In considering these points, Councils are expected to meet their *"objectively assessed needs"* for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.<br><br>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making (planning application) rather than the plan-making process. The changes do not affect how we implement plans that are already adopted, such as our Core Strategy and associated proposals that it contains.<br><br>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council progresses the Site Allocations DPD. |
| Dwelling capacities of Local Allocations | No change. An estimate of site capacities for the Local Allocations was established through the Core Strategy. These estimates were based on prevailing densities and the area of the site, and tempered by local infrastructure considerations. It is appropriate to make effective use of land if it is to be released from the Green Belt in order to minimise the scale of releases required. Following more detailed technical work carried out as part of preparing draft masterplans, some site capacities have been adjusted to reflect the availability of further information about the amount of land available for development and/or the expected configuration of uses within a site. Overall this does marginally increase the level of housing supply proposed across the Local Allocations as opposed to the levels indicated in the Core Strategy. It is important to note that this work has indicated that the capacity of one site (LA4) should be reduced. None of the issues raised through the Pre-Submission Site Allocations or draft masterplan consultation indicate that the current capacity figures should be amended. The final capacity of all Local Allocations will be tested via the planning application process. This application process will include further public and stakeholder consultation. |
| Concerns re infrastructure capacity (general) | No change. As part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an Infrastructure Delivery Plan |

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| | (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors' surgeries was provided by the Clinical Commissioning Group.<br>The InDP is updated regularly (usually on an annual basis). The current (2015) update has been timed to take account of concerns regarding infrastructure issues raised through the Site Allocations Pre-Submission consultation and provide an opportunity to discuss these further with providers. This revised version of the InDP will accompany the Submission version of the Site Allocations DPD. This update will ensure key infrastructure concerns are raised with providers and any necessary amendments made to the DPD and accompanying Local Allocation master plans to ensure these are properly addressed.<br>Specific issues raised relating to individual sites are addressed under the relevant Local Allocation. |
| Concern about capacity of schools in Tring – particularly that there is inadequate capacity in local schools and no information on how 'latent capacity' will meet future demand for places (the evidence base and Infrastructure Delivery Plan) are out-of-date. | Minor change required to clarify the position regarding potential additional education provision in Tring.<br><br>At the request of the Council, Officers in the Children's Schools and Families Unit at Hertfordshire County Council have provided updated information regarding schooling issues in Tring.<br><br>For primary schools this information shows a predicted surplus of 27 places for 2015/16, 52 for 2016/17 and 44 for 2017/18. This is out of a total reception place capacity of 200 spaces across the town. (The County Council do not model primary school capacities beyond a 4 year period).<br><br>The updated information from the County Council also shows that primary schools in Tring have sufficient latent capacity to provide for housing growth to 2031. This conclusion reflects the scope to expand Dundale Primary School from 1.3 to 2 forms of entry and expand The Grove Primary School from 2 to 3 forms of entry.<br>In terms of secondary school capacity, there is predicted to be a small deficit of places in the period 2017/18-2021/22 of between 1 and 15 places. Before and after this period there is expected to be a small |

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| | surplus. The County Council are happy that the Core Strategy refers to the potential for the secondary school to expand on its existing site, and the provision of detached playing fields to enable this expansion.<br><br>For clarity, the following changes are proposed to the Site Allocations DPD:<br><br>• Add text to section 7 to explain that the forecast needs for school places in Tring can be met by expanding Tring Secondary School (including the provision of detached playing fields) and expanding Dundale and The Grove Primary Schools.<br><br>• Include the proposed detached playing fields for Tring Secondary School in the Schedule of Leisure Proposals and Sites in section 7 of the Site Allocations Written Statement<br><br>• Include the location of these detached playing fields on the Policies Map. This was requested by Hertfordshire County Council through their representations (see response to issues relating to Chapter 7 of the Site Allocations).<br><br>• Add text to the Tring Place Strategy (chapter 13 in the Written Statement) to reflect the above. |
| Concerns regarding waste water and sewerage capacity<br>• Thames Water comment re 'no objection but concerns about capacity' –<br>• EA initial representations were of support, late representations changed this to object | Minor change required to add reference to specific housing proposals regarding the need for early liaison required with Thames Water to develop necessary Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of the sites.<br><br>A series of meetings have been held to discuss issues regarding waste water and sewerage issues with Thames Water (together with the Environment Agency) in early 2015. With regard to the Local Allocations, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific amendments to the text of the Site Allocations document with regard to the Local Allocations.<br><br>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers at the planning application stage for larger |

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| | sites or those located in areas of existing sewerage / waste water constraint. For the development proposed within the Site Allocations DPD (and specifically the six Local Allocations in addition to those listed below), Thames Water will require the developers to complete a Drainage Strategy to inform any planning application. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. In the light of this experience, the landowners / developers of the Local Allocations have been advised to liaise with Thames Water at an early stage when drawing up their detailed schemes. The delivery and phasing section of each of the Local Allocation policies explicitly refers to *'Early liaison with Thames Water required to ensure sufficient sewerage and sewerage treatment capacity is available to support delivery of the site.'* This requirement is reiterated within the associated masterplans. If any more specific upgrade requirements are identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues, these will be reflected in the text of the masterplans and/or passed through to developers at the pre-application stage.<br><br>With regard to the other proposed housing sites contained within the housing schedule of the Site Allocations DPD that Thames Water have specifically commented on, it is considered appropriate to add a short reference to the planning requirements to refer to the need for liaison with Thames Water and preparation of technical work (i.e. Drainage Strategy) to assess capacity issues. These sites are:<br><br><u>Housing Allocations:</u><br>• H/2 National Grid, 339-353 London Road, Hemel Hempstead;<br>• H/3 Westwick Farm, Pancake Lane, Hemel Hempstead;<br>• H/4 Ebberns Road, Hemel Hempstead;<br>• H/5 Hewden Hire Site, Two Waters Road, Hemel Hempstead;<br>• H/6 39-41 Marlowes, Hemel Hempstead; *(Note: site proposed for deletion)*<br>• H/8 Turners Hill, Hemel Hempstead;<br>• H/9 233 London Road, Apsley, Hemel Hempstead;<br>• H/10 Apsley Paper Trail, Apsley, Hemel Hempstead;<br>• H/11 The Point, Two Waters Road, Hemel Hempstead; |

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| | • H/12 St Margarets Way/Datchworth Turn, Hemel Hempstead;<br>• H/14 Frogmore Road, Hemel Hempstead;<br>• H/17 Corner of High Street/Swing Gate Lane, Berkhamsted.<br><br><u>Mixed Use Allocations:</u><br>• MU/1 West Herts College site, Hemel Hempstead;<br>• MU/2 Hemel Hempstead Hospital;<br>• MU/3 Paradise/Wood Lane, Hemel Hempstead;<br>• MU/4 Hemel Hempstead Station Gateway;<br>• MU/6 Durrants Lane/Shootersway, Berkhamsted.<br><br>A short Advice Note entitled 'Planning Requirements for Waste Water Infrastructure Issues in Dacorum' has also been prepared and placed on the Council's website. This advises developers of the requirement for the above sites, sets out what a Drainage Strategy should cover and provides contact details should further advice be required from Thames Water.<br><br>Where necessary the Council will impose Grampian Conditions to ensure sewerage and waste water issues are appropriately addressed prior to occupation of any permitted development.<br><br>The Council are however aware of the need to update the Water Cycle Study published in 2010 which identifies areas of development constraint within the Borough – particularly in Hemel Hempstead. In light of this, and with the comprehension that water infrastructure pays no regard to administrative boundaries and thus water catchment areas cover a geographical area much wider area than Dacorum, the Council are currently party to a county-wide study being completed by Hertfordshire County Council. This study will holistically review the water environment (supply and waste water treatment), assess waste water infrastructure issues against planned growth (Phase 1), and, based on various growth scenarios, explore infrastructure options and solutions for any deficits identified (Phase 2). Phase 2 is not likely to be commenced until 2016/17 following completion of Phase 1.<br><br>Therefore, mindful of the above-mentioned timescales and requirement for a 5-year housing land supply which will be delivered through the proposed Site Allocations and Local Allocations as agreed through adoption of the Core Strategy (in September 2013), the Council |

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| | propose to prepare and agree a tripartite Statement of Common Ground with Thames Water and the Environment Agency. This Statement will outline what assessments (and therefore infrastructure upgrades) are necessary to deliver proposed developments and commit the Council to assisting Hertfordshire County Council in completing the above-mentioned county-wide study. The latter will subsequently inform the Council's new Local Plan following completion of associated technical work to assess projected growth within the Borough. |
| Surface water drainage and flood risk – impact of development on Local Allocations and adjoining land | Minor changes required. The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy. However, since publishing the Pre-Submission version of the Site Allocations document the Government has confirmed a change in approach to how development schemes will be assessed. Rather than a dual system when the local planning authority consider the planning application and the SuDS Approval Body (SAB), SuDs (Sustainable Urban Drainage Systems) issues will now be dealt with through conditions on planning applications, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. The text of Policies LA1-LA6 should be amended to reflect this change in procedure. Similar amendments will also be required to each of the Local Allocations masterplans. |
| Concerns over road capacity | No change. Both the local highway authority (Hertfordshire County Council) and the Highways Agency (now called Highways England, who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by either party, although it is acknowledged by the Council that some local highways improvements and mitigation measures will be required relating to specific site proposals.<br><br>For Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model (Paramics model). This model is managed by specialist transport consultants on behalf of Hertfordshire County Council.<br><br>A number of model runs have been undertaken throughout the preparation of the Core Strategy and |

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| | Site Allocations DPDs to ensure that the most up-to-date information regarding the scale and location of new development within the town is reflected. These are as follows:<br>1. 2008 base model (May 2009).<br>2. 'Do minimum' models for 2021 and 2031- accompanied by a Future Years Issues Report (May 2009).<br>3. LDF Option Test Western Hemel (August 2010).<br>4. Combined Local Plan Test (July 2012).<br>5. Morrisons Development Test (Summer 2013).<br><br>In addition to the above a further model run was carried out in Spring 2015 to ensure that there had been no material change in circumstances since 2013 and help inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Highway Authority have advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.<br><br>In addition to transport modelling, specific traffic studies have been prepared for Local Allocations LA1 and LA3. These have taken account of the Transport Model and the agreed with the Highway Authority. Any necessary highway improvements are referred to in the relevant Local Allocations policies of the Site Allocations document, and elaborated in the site master plans. The Highway Authority has confirmed through their representations that they support the content of all.<br><br>For parts of the Borough not covered by the Paramics Model, the Council has taken advice from the Highway Authority regarding highway issues. This advice is reflected in the planning requirements for individual sites and in the Schedule of Transport Proposals. Site LA5 currently has a Transport Scoping Report which has also been agreed with HCC.<br><br>For all development sites, detailed highway issues will be considered as part of the planning application process, for which the Highway Authority are statutory consultees. Where appropriate this will include provision of a Transport Assessment. Appropriate highway improvements and mitigation measures will be secured through developer contributions and |

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| | agreements.<br><br>Officers met with a representative from Highways England to discuss their comments in May 2015. Highways England have subsequently confirmed by email that their comments should not be treated as an objection to either the overall level of development planned for the Borough, or to any specific site(s). Rather, they required some further clarification regarding the work that had been carried out, and future work planned, to consider the impact of current and future development on the strategic road network. This information has been included in an update to the September 2014 version of the Sustainable Development Strategy Background Issues Paper.<br><br>Highways England are also aware (and involved with) the development of a new county-wide transport model that will be used to test the impact of future growth scenarios emerging form the early partial review (new Local Plan) process. |
| Loss of Hemel Hempstead Hospital | No change. The decision to downgrade Hemel Hempstead hospital was taken by the West Herts Hospital Trust a number of years ago. It is not a matter over which the Council has any control. What the Council has tried to ensure through the Core Strategy, Site Allocations DPD and work on its Infrastructure Delivery Plan (InDP) and Community Infrastructure Levy (CIL), is that appropriate health infrastructure is planned for within the Borough. This includes the requirement for improved GP provision as a result of development at west Hemel Hempstead (LA3), requirements for site MU/2 regarding the Hospital Zone in Hemel Hempstead Town centre, and the content of the Council's Regulation 123 list. |
| The appropriateness of the Council's approach towards meeting Gypsy and Traveller needs | No change. The original technical work was prepared on a South West Hertfordshire basis by consultants Scott Wilson and included a large number of sites that were coded red, amber, green - depending on the consultant's view of their suitability. All were in the Green Belt or Rural Area as no suitable urban sites were found. Many site suggestions were some distance from settlements, services and facilities and would not comply with Government guidance (or our own Core Strategy policy). In addition the emphasis was on identifying suitable locations. Landownership was not considered in the study, and therefore it was not clear how many sites in reality had reasonable prospects of actually being delivered. The full Scott Wilson Report is on the Council's website: http://www.dacorum.gov.uk/home/planning- |

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| | development/planning-strategic-planning/evidence-base/gypsies-travellers-study-potential-sites-(stage-2)<br><br>Feedback on these potential sites was sought as part of Site Allocations consultation in 2008. Following analysis of these consultation responses, a report was considered by Members regarding how and where provision should be made within the Borough. This resulted in the current policy approach of seeking to integrate sites with new 'bricks and mortar' housing. The relevant Cabinet Report is available online: http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0<br><br>A brief summary of the process the Council has been through with regards to considering and assessing potential Gypsy and Traveller sites is set out in the Issues Paper the Council prepared for the Core Strategy Examination: http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&sfvrsn=0. This clearly explained to the Inspector the Council's proposed approach of setting strategic policies (plus a monitoring target for new pitch provision) through the Core Strategy and identifying precise pitch locations and requirements on the three largest Local Allocations (LA1, LA3 and LA5) through the Site Allocations. The specialist consultants who prepared the Council's latest Traveller needs Assessment (ORS) stated that the incorporation of new sites within new urban extensions was emerging as a 'good practice' approach.<br><br>The potential to extend the two existing Gypsy sites within the Borough has been considered and discussed with the Gypsy and Traveller Units at Hertfordshire County Council, who own and manage both sites. They have advised that the Three Cherry Trees Lane site is already larger than the ideal site size and should not be extended. The Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the maximum size suitable for its rural location on the edge of a village. The potential for expansion is severely limited due to land ownership (with an area of land that may have been appropriate for expansion being bought by a local farmer with the express intent of preventing this from occurring). There is also a written undertaking between the County Council and local Parish Council that there |

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| | will be no further site expansion. Whilst this is not legally binding, it is a further constraint to expansion. Officers have subsequently written to the owner of land adjacent to the Long Marston site, who has confirmed that they would not support the use of their land for any future expansion of the site.<br><br>Other sites suggested through the Pre-Submission consultation and also submitted as having development potential through the 'call for sites' process' have also been considered and discounted as realistic or appropriate options. A fuller explanation is set out in the Homes and Community Services Background Issues Paper. The text of the September 2014 version of this document has been updated to elaborate on the explanation previously given, as a result of representations received. New sites suggested have also been appraised. The Council has also approached the owners of land adjacent to the Long Marston site (currently owned and managed by the County Council), to explore the potential for further expansion of this site. |

5.4 A more detailed breakdown of issues raised and the Council's response to these is set out below in plan order.

**Chapter 2: Promoting Sustainable Development**

5.5 Comments were received from 31 people/organisations relating to this section of the document. Around a third of people/organisations made supportive comments including Heritage England, Hertfordshire County Council, Berkhamsted Town Council, The National Trust and Natural England (who also submitted some comments of objection). The main issues raised in objection to the chapter are outlined below.

***Identified Proposals and Sites***

5.6 Representations were made objecting to the principle of removing the Local Allocation sites from the Green Belt, and to the principle of locating gypsy and traveller sites within Local Allocation (LA) sites, citing National Policy regarding the Green Belt. Further objections were made on the basis that non-Green Belt sites should be exhausted before any sites are released from the Green Belt for use for housing.

5.7 The Council is satisfied that its approach to removing the LA sites from the Green Belt is robust and accords with national Green Belt policy in terms of the plan-making process. The decision to remove the LA sites from the Green Belt was taken in the adopted Core Strategy. The role of the Site Allocations DPD is to take forward the levels of development at the broad locations set out in the Core Strategy.

5.8 The Council is satisfied that its approach to locating gypsy and traveller sites on three of the LA sites is sound and justified in accordance with National Policy. There is an identified need for new pitches that the Council is obliged to meet, there is an absence of realistic alternatives, and all of the locations are now to be eventually released from the Green Belt. The decision to integrate new sites with new 'bricks and mortar' housing was taken by the Council in 2008 and subsequently incorporated into the Core Strategy, where it was considered sound by the inspector. Consideration has been given to the potential to extend the existing sites in the Borough but is not appropriate for reasons set out in the Background Issues Paper: Providing Homes and Community Services.

***Countryside and Settlement Boundaries***

5.9 The Council is satisfied that the removal of the LA sites from the Green Belt is necessary to meet the Borough's future housing need. In taking the decision to remove these sites from the Green belt, the Council gave full and proper consideration to the ability of non-Green Belt sites to meet housing need as set out in the Background Issues Paper: Providing Homes and Community Services.

5.10 Hertfordshire Gardens Trust raised concerns that the changes to the Green Belt boundaries around Tring could adversely affect the heritage assets of Tring Park and Tring Cemetery. The change to the Green Belt boundary abutting Tring Park is sufficiently minor in nature that any effects will be negligible. The effect of the proposed development on Tring Cemetery has been factored in to the policies and draft Master plan for LA5.

5.11 A number of landowners used their response to chapter 2 to promote sites for development, either to be allocated for development immediately, or to be allocated for development following the partial review of the Core Strategy. No changes a recommended as a result of these submissions. The sites promoted were not suitable to be allocated for immediate development for various reasons; some had been previously considered and rejected, whilst others represented a change too big to be considered an anomaly to the existing Green Belt boundary. It is not appropriate for the Site Allocations DPD to allocate sites for development beyond the plan period as its role is to deliver the policies and objectives of the Core Strategy, not to pre-empt the content of any future Local Plan.

***Small Villages in the Green Belt or Rural Area***

5.12 Objections to the Pre-Submission Site Allocations DPD were made on the basis that altering the Green Belt boundary to correct minor anomalies is not justified and is not consistent with national policy. The Council is satisfied that the principle of correcting minor anomalies to the Green Belt through the Site Allocations DPD was established through the Core Strategy and accepted as a sound approach by the Planning Inspectorate and has received legal advice to this effect.

### *Major Developed Sites in the Green Belt*

5.13 The use of the Major Development Site in the Green Belt designation was questioned for its compliance with national planning policy. The use of this designation is set out in the Core Strategy, which was adopted in 2013, and is considered appropriate with regard to national guidance.

5.14 In addition to those outlined above, a number of comments were received relating to common issues raised throughout the consultation. The Council's response to these objections is set out in the 'response to frequently raised issues' (see Table A above). Common issues raised in relation to Chapter 2 include:

- The Pre-Submission Site Allocations DPD does not take account of evidence undertaken to inform the new single Local Plan, e.g. the Green Belt review Stage 1.
- The Site Allocations DPD should allocate more Green Belt sites for housing to meet its Objectively Assessed Need for housing and to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, years 11-15.
- National Policy (the NPPF) dictates that Green Belt boundaries should only be altered where exceptional circumstances have been demonstrated, and this is not the case for the Local Allocations.

### *Mixed Use Proposals*

5.15 Thames Water submitted standard objections to Mixed Use allocations MU/1 - 4 (inclusive) and MU/6 (and to other proposals explained below) regarding the assessment of and potential need for drainage infrastructure. Changes are considered appropriate to accommodate these concerns and Thames Water are satisfied with the amendments proposed.

5.16 Natural England sought changes to the planning requirements to MU/4 to reflect the potential impact of the scheme on the nearby Roughdown Common SSSI. This is considered to be a constraint that the development should reasonably respond to and has been accepted as a proposed amendment.

5.17 Sports England is supportive of the leisure provision in allocations MU/5 and MU/6. However, some linked changes are required to MU/5 in order to take account of their related comments on the timing and delivery of the associated replacement tennis facilities under housing allocation H/7.

5.18 Berkhamsted Town Council has objected to MU/6 in terms of the scheme's capacity being too high and in respect of the proposed removal of the existing General Employment Area (GEA) designation affecting MU/7. The existing housing capacity to MU/6 is considered appropriate in the circumstances. No change is justified in order to retain the existing Billet Lane designation given the advanced nature of the associated scheme and the impending relocation of the current occupiers. However, the Council has accepted suggestions from the Town Council that proposals H/15 and H/16 should be identified as

new Mixed Use allocations because of the more mixed character of these schemes.

## Chapter 3: Enabling Convenient Access Between Homes, Jobs and Facilities

### *Transport Proposals*

5.19 A range of comments (although numerically few) were made raising concerns over the Site Allocations document's approach to and adequacy and timing of, transport infrastructure (much of this directed towards the Local Allocations). The Site Allocations document already recognises the need for transport improvements to accommodate planned new development (many of which are identified as transport proposals). In addition, given the amount of technical work undertaken (and on-going) at a strategic level (e.g. Hemel Hempstead transport model runs) and local level (e.g. transport studies connected with the Local Allocations) together with support from the local Highway Authority, no changes were felt justified.

5.20 Berkhamsted Town Council has highlighted a number of concerns over local schemes affecting the town. Not all warrant changes to the Site Allocations DPD, but some minor adjustments can be made to the transport schedule / planning requirements to accommodate their concerns over the timing of specific transport proposals. Other issues will be addressed through the implementation of projects set out in the Berkhamsted and Tring Urban Transport Plan (UTP).

5.21 While not objecting in principle to either the overall level of development planned for the Borough, or to any specific site(s), Highways England were seeking some further clarification regarding the work that had been carried out, and future work planned, to consider the impact of current and future development on the strategic road network. This information can be included, without the need for significant changes to the Site Allocations document, through an update to the September 2014 version of the Sustainable Development Strategy Background Issues Paper. Some editorial updating of the background text to reflect this context is acceptable.

5.22 Tring Town Council has suggested that there should be reference to the Crossrail project given its impact on Tring Station should the scheme go ahead. A minor update of the background text is considered appropriate to reflect this initiative.

## Chapter 4: Providing for Offices, Industry, Storage and Distribution

5.23 Responses were received from nine people/organisations relating to this chapter, with a fairly even split between supportive comments and those objecting to the document. Support was expressed by one landowner and a number of organisations including Hertfordshire County Council, Tring Town Council, Heritage England and Natural England.

### *General Employment Areas*

5.24 An objection was raised to the policy approach to the Billet Lane General Employment Area (GEA) on the basis that the policy should allow for B2 uses. However, the evidence base identifies the GEA as unsuitable for B2 use.

5.25 The landowner used their response to promote the Akeman Street GEA site for residential use. This issue was considered as part of the Core Strategy process where it was concluded that the GEA designation should be retained.

5.26 The landowner of the Bourne End Mills Employment Area in the Green Belt objected on the grounds that the boundary of the site is too restrictive. Officers agreed that the boundary of the site should be expanded, but propose the addition of an infill area to the site's Major Developed Site in the Green Belt designation to control the area where built development will be allowed.

## Chapter 5: Supporting Retailing and Commerce

5.27 Only two responses were received to this chapter; both from landowners, with one supportive comment and one objection.

5.28 The main objection was raised on behalf of the landowner of the Retail Proposal S/1 at Jarman Fields on the basis that planning requirements for the site are linked to an existing planning permission. Officers agree that this approach is not appropriate and have changed the planning requirements accordingly, whilst retaining the key principles around acceptable uses.

## Chapter 6: providing Homes

### *Housing*

5.29 Representations were made supporting the case for both greater and lower levels of development, across the borough as a whole and within individual towns. National policy was used to argue their respective cases. Two new sites in Bourne End and Berkhamsted were being promoted as a result of such objections.

5.30 The Council is satisfied that its approach to levels of housing development is robust and accords with Green Belt policy in terms of the plan-making process. The housing target has been set by the adopted Core Strategy. This has also established the principles for identifying the six Local Allocations. The role of the Site Allocations DPD is to take forward levels of development signalled by the Core Strategy. No "showstoppers" have been identified in terms of the adequacy of physical and social infrastructure to support future development in the Borough.

5.31 A number of housing sites were being promoted by landowners, agents and developers, particularly in relation to what was perceived as a lack of identified housing supply. Sufficient housing supply exists across the borough

and within the towns in order to meet the Core Strategy housing target and indicative capacities identified in the Place Strategies. No new sites are therefore justified.

5.32 Luton BC emphasised the ability and reasonableness under the Duty to Cooperate for Dacorum to meet the unmet needs of Luton. This was considered in detail through the Core Strategy. The examination Inspector, in finding the Core Strategy sound, supported the Council's approach to DTC and endorsed the Council's target of 430 dwellings per annum subject to its early review. The review is being taken forward through the new single Local Plan which includes continuing engagement with districts on cross-boundary matters. The Council will also consider its ability to meet adjoining districts' unmet need (and vice-versa) in updating its Strategic Housing Market Assessment (SHMA) as part of the supporting technical work to the new plan.

5.33 Local residents, landowners and organisations commented in support of and in objection to, individual housing allocations.

5.34 The County Council has supported the provision of a new school under proposal LA3. Similarly, Sports England is supportive over the level of leisure provision to be provided by this allocation. The organisation also commented on proposal H/7. They were concerned over the link between the housing on the site and securing the replacement tennis facilities to an appropriate quality and quantity under MU/5. The Council acknowledge that changes to the planning requirements of both proposals would be helpful in achieving these aims.

5.35 Thames Water raised concerns in respect of a number of proposals and the potential adequacy of the drainage infrastructure to accommodate each new development. The Council accepts that a reference to the need to assess and potentially bring forward new infrastructure is appropriate. The Council has also accepted, where appropriate, comments from the Environment Agency that a number of proposals should make reference to Flood Risk Assessments.

5.36 Historic England objected to a number of proposals in respect of the form of development and its impact on local heritage. Some minor matters can be accommodated through changes to the planning requirements. Many other detailed concerns are already appropriately addressed through the existing planning requirements, and the Council is keen not to be too prescriptive with the nature of the scheme so as not to inhibit innovation in design.

5.37 Berkhamsted Town Council raised detailed concerns over the form of the proposal in respect of allocations H/15, H/16 and H/17. Many of these concerns are already appropriately dealt with through the planning requirements, although their suggestion that the site boundary should be extended in respect of H/15 to reflect work on a detailed scheme is a reasonable one. The Council also accepts the Town Council's suggestion that this site and H/16 should be re-designated as Mixed Use allocations because of the mixed use nature of each scheme.

### *Local Allocation LA1*

5.38 Only a few representations were received in response to this proposed Local Allocation with the majority raising objection to either the principle of the development or the proposed details, particularly in respect of the impact of the proposal on Piccotts End Conservation Area, capacity of the local highway network and flooding.

5.39 However, Natural England and Thames Water stated their support for this proposed Local Allocation. Natural England welcomed the retention of green infrastructure and positive effects of the proposal identified in the Sustainability Appraisal.

5.40 Thames Water support the proposal at LA1 but, as with a number of other proposed allocations, have identified the need for developers to complete Drainage Strategy in order to assess and identify the requirement for new or upgraded infrastructure to ensure sufficient capacity is brought forward ahead of the development. The Council has incorporated this requirement into the draft master plan for LA1 and has also prepared an advice note for developers setting out the requirements of a Drainage Strategy for both Local Allocations LA1-LA6 and other site allocations as identified by Thames Water. This is available from the Council's website.

5.41 Objections were raised to the principle of the development by the Council for the Protection of Rural England (CPRE) and some local residents. Reference was also made to recent Government statements about Green Belt protection. However, the principle of the proposal is now firmly established through the adopted Core Strategy.

5.42 Historic England objected to this Local Allocation in respect of the proposed form of development and its impact on designated heritage assets. Specifically, they raised concerns about the height of buildings within the site taking into account the local topography and the impact this would have on the Piccotts End Conservation Area. In response to this, the Council has proposed a modification to the 'Key Development Principles' section of Policy LA1 to clarify that buildings should be limited to two storeys in height except where a higher element would create interest and focal points provided such elements would be appropriate in terms of topography and visual impact (including impacts on the Conservation Area). Equivalent changes will also be made to the draft master plan. Furthermore, detail of the proposal including design of buildings will be set out and considered within any planning application.

5.43 With regard to flooding, some local residents have identified the prevalence of flooding at Piccotts End, which coincides with the flood zones around the River Gade, and are therefore concerned that the proposed development, taking into account the local topography, might exacerbate flood risk. The Council have recognised flood risk and drainage within the draft master plan and consequently identified the need to consider this in development of the master plan and preparation of any subsequent planning application. The planning application will also need to be supported by a site-specific Flood

Risk Assessment and include appropriate Sustainable Urban Drainage Systems (SuDS) to mitigate any surface water run-off. Minor changes are proposed to reflect recent updates to national policy regarding the approval of SuDS.

### *Local Allocation LA2*

5.44 Only a few objections were made to this local allocation. Objections were raised to the principle of the development by the Council for the Protection of Rural England (CPRE) and some local residents. Reference was made to recent Government statements about Green Belt protection. CPRE felt that the need for LA2 should be reconsidered when the Core Strategy is reviewed. However, the principle of the proposal is now firmly established through the adopted Core Strategy.

5.45 Historic England expressed concern that the LA2 development would harm the historic character of the adjoining Old Town Conservation Area. They are not convinced that there should be any buildings over two storeys. However, they recognise that the key development principles for LA2 and the LA2 draft Master Plan go some way to addressing their concerns. In response, the Council is proposing to amend key development principle 5 to state that new housing should not be harmful to the historic environment. Minor changes will also be made to the master plan.

5.46 Two other minor changes to Policy LA2 are proposed, to accommodate standard drainage concerns raised by Thames Water and national updates regarding the approach to the sustainable urban drainage systems (SuDS) approval system.

### *Local Allocation LA3*

5.47 Objections were raised by local residents and the local action group (WHAG) to the principle of the development, the appropriateness of the infrastructure to support the proposal, and its justification under national Green Belt policy and against (what they consider to be) increasing levels of windfalls. The principle of the proposal and suitability of associated infrastructure have already been considered under responses to the local allocations in the Housing chapter above.

5.48 Access and the suitability of the local road network to accommodate the development proved to be common matters of concern. The associated transport work and wider ongoing town modelling point to the ability of the local road network to support the allocation subject to on-site and off-site road improvements being in place. The proposed primary access points from Long Chaulden and The Avenue are logical and there are no other reasonable alternatives. The emergency access from Chaulden Lane, which could also serve the proposed traveller site, is needed and is suitable for this purpose. The Highway Authority supports the approach on all these matters.

5.49 Historic England raised a number of objections to the details of the proposals. Most of these were already addressed through the existing development principles in the policy and master plan. However, greater reference to the implication of the development on the site's heritage and archaeology was considered a reasonable change to accommodate.

5.50 Sports England stated their support for the new leisure space to be provided by the scheme.

5.51 The County Council's Ecology Advisor and the Dacorum Environmental Forum expressed concerns over the suitability of the proposed route and role of the green corridors through the allocation. Following discussions after the close of consultation, the Ecology Adviser has acknowledged that there are advantages and disadvantages over the route of the corridor. On balance, he is satisfied that an east-west corridor is acceptable subject to adopting a sound approach to its ecological value and management. The Council accepts that clarification over the different leisure and wildlife roles and ongoing management of the green infrastructure would be helpful to ensure the ecology to be provided is of genuine value. These points can be reflected in amendments to the master plan.

5.52 Comments were received from a number of landowners regarding the clarity and flexibility of approach to the delivery of the development. The Council is satisfied that the policy and master plan remain clear over these matters and that flexibility already exists in policy to bring forward the scheme earlier, if required. It was pointed out that the boundary to the allocation had been incorrectly drawn to include part of the hamlet of Pouchen End. It is appropriate for the boundary to be redrawn to remove the hamlet.

***Local Allocation LA4***

5.53 Only a few objections were made to this local allocation. Objections were raised to the principle of the development, phasing and its justification under national Green Belt policy and against (what are perceived to be) increasing levels of windfalls. The principle of the proposal is now firmly established through the adopted Core Strategy and flexibility already exists in policy to bring forward the scheme earlier, if required.

5.54 Historic England were concerned over the impact of the scheme on the British Film Instituter site adjoining LA4, but this can already be dealt with through retaining and supplementing boundary planting and through care in the design and layout of new buildings.

5.55 Only two minor changes to the policy are proposed to accommodate standard drainage concerns raised by Thames Water and national updates regarding the approach to the SuDS approval system.

5.56 The County Council's Ecology Advisor remains concerned over the proposed mitigation for the loss of the area of grassland. The Council acknowledges that this remains an issue. However, it considers that appropriate mitigation can be achieved without the need for any modifications to the policy through

ongoing discussions with the County Council as part of the pre application and/or planning application process.

***Local Allocation LA5***

5.57 A number of objections were made to the principle to the proposed LA5 development, for example, from the CPRE who consider that the site should remain in the Green Belt. However, the principle of the proposal is now firmly established through the adopted Core Strategy.

5.58 Concerns were expressed by the Chilterns Conservation Board, Natural England, Aylesbury Vale District Council and others about the impact on the Chilterns Area of Outstanding Natural Beauty (AONB), contrary to national and local planning policies. In particular, there was concern regarding the proposed cemetery extension, the children's play area, Traveller site and possible playing pitches. In contrast, Sport England supports playing pitches on the site. A commonly held view is that the cemetery extension should adjoin the existing cemetery and not be physically separate from it.

5.59 The Council considers that LA5 will not significantly harm the special qualities of the AONB. Indeed, the AONB will be enhanced by the public open space and cemetery, which will be green, open, well landscaped uses. The Traveller site will be small, well screened and will have only a limited impact on the AONB. The reasons why the Council favours a detached cemetery extension in the western fields within the AONB are set out in the LA5 Draft Master Plan, the main reason being that it is the best option to meet the long term needs for burials in the Tring area.

5.60 Many local residents consider that Tring's infrastructure cannot cope with existing demand and LA5 will make the situation worse. Issues raised include overcrowded schools and doctors' surgeries, and traffic congestion in the town centre. Hertfordshire County Council has advised that there is scope to expand schools in Tring to meet anticipated future demand, whilst the Clinical Commissioning Group does not anticipate any capacity problems in the foreseeable future. Some changes to the 'meeting community needs' section of the Site Allocations document are proposed to clarify the position regarding schools. The Highway Authority has no concerns regarding the ability of the overall road network to cope with the scale of new development proposed, although some local measures will be required.

5.61 Other points from objectors include opposition to allowing development at LA5 before 2021 and the increase in estimated housing capacity from 150 homes in the Core Strategy to 180-200 in the Site Allocations document. No changes are proposed in response to these objections. Releasing LA5 before 2021 is justified for a number of reasons, including securing the wider benefits of the employment area and cemetery extensions and public open space at an early date. The increased capacity at LA5 is justified on the basis of the more detailed technical work carried out to produce the draft master plan and the need to make the best use of land.

***Local Allocation LA6***

5.62 Although the majority of response relate to details contained within the draft Master Plan, there were very few representations received in response to this Local Allocation.

5.63 Objections were raised by CPRE, an individual and local landowner regarding the principle of the development, including development within the Green Belt, housing need and suitability of suggested alternative sites elsewhere within Bovingdon. The principle of the development has been established through adoption of the Core Strategy and, in developing this, incorporated an assessment of all promoted sites in Bovingdon (Assessment of Potential Local Allocations & Strategic Sites – Final Assessment (2012)). In terms of need, the role of the Site Allocations DPD is to deliver the requirements set out in the Core Strategy and does not need to specifically identify all future housing sites (taking into account the role of unidentified and windfall sites). The purpose of subsequent technical work (including a Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment) is to review the Core Strategy and identify the content of any future Local Plan, including further sites to be allocated, in order to meet the Borough's objectively-assessed needs where appropriate.

5.64 Natural England and Thames Water stated their support for this proposal. Natural England welcomed the inclusion of pedestrian and cycle access to surrounding areas and supported the need to include biodiversity mitigation and enhancement measures within the planning application. These elements are already incorporated into the draft master plan and will both be material considerations at the planning application stage. Thames Water also highlighted the need for developers to complete a Drainage Strategy (as with the other five Local Allocations) and the Council has reflected this requirement through a minor change to the Site Allocations document.

***Gypsy and Travellers***

5.65 Very few representations were received on this section of the Site Allocations document. Most of the objections stemmed from comments directed at the three local allocations LA1, LA3 and LA5 (and their associated master plans) where the new traveller sites are proposed.

5.66 Objections were raised to the general principle of providing such sites and whether they accord with Government policy, particularly in relation to the Green Belt. The Council is satisfied that its approach to new sites is appropriate and is supported by technical work and the County's Gypsy and Travellers unit. There is identified need for new pitches that the Council is obliged to meet, there is an absence of realistic alternatives, and all of the locations are now to be y released from the Green Belt.

5.67 The majority of objections were directed at the traveller site associated with LA5 with the principal objector being Cala Homes, the site's developer. These raised concerns over the impact of the site on the Green Belt and AONB, the extent to which alternatives have been considered and its impact on viability. The Council is satisfied that these factors have been properly taken into account in planning for the site (although additional landscaping works are

required to reduce its impact on the AONB) and that other locations have been explored. The proposal should remain given the lack of realistic local alternatives, particularly following the outcome of exploring the potential expansion of the existing Long Marston site.

5.68 New sites and locations were suggested by local residents in the Hemel Hempstead (Maylands Business Park), Berkhamsted, Tring and Bovingdon Airfield areas. However, these were not felt suitable for a number of locational and ownership reasons, bearing in mind the Council's preferred approach to provide sites as part of planned new large housing developments.

## Chapter 7: Meeting Community Needs

### *Social and Community Facilities*

5.69 A total of sixteen representations were received in response to this chapter (relating to social, community, leisure and cultural facilities) and whilst the majority raised objections these predominantly related to errors, omissions or identified the need for further clarification within the document and associated map book.

5.70 Hertfordshire County Council raised objection to a mapping error relating to the proposed education zone in northwest Berkhamsted (EZ/3), which was also noted by the CPRE and some local residents. The proposed education zone should encompass the Bridgewater School site as well as the reserve site, which includes land to the northwest of the school and Bridleway, to accord with the area previously identified within the Core Strategy (Berkhamsted Place Strategy). This mapping error will be rectified and identified as a minor change.

5.71 The Environment Agency raised objection to proposed allocation of Education Zone EZ/1 in Nash Mills as this area was not included within the Council's Level 2 Strategic Flood Risk Assessment (2008). Parts of the site fall within Flood Zone 2 where 'more vulnerable' development, including educational establishments, are generally considered appropriate. Nevertheless, any planning application for development of any site within this allocated zone will be subject to a site-specific Flood Risk Assessment. Whilst it is considered that no change is required as this constraint does not preclude development entirely, this issue has since been discussed further with Hertfordshire County Council as Local Education Authority and the need to conduct further assessments of the site has been identified as a result.

5.72 The landowners of the existing Amaravati Buddhist Monastery in Great Gaddesden also raised objection to the proposed allocation of the site to enable redevelopment and improvement of this community facility. Their concerns related to flexibility of the proposal however this had already been highlighted to the Council. As such, the Council had engaged in discussions with them and their agents just prior to opening the consultation on the Site Allocations DPD. Consequently the principle of amending the proposal wording and defined area within the map book had been agreed and the

suggested minor changes include clarification of facilitate redevelopment within previously developed parts of the site.

5.73 Representations received from Natural England in respect of Chapter 7, as well as Local Allocation LA5 (see above), indicate support for the allocation of land for a cemetery extension and public open space both at the LA5 site (C/1 and L/3, respectively) and identification of land for the redevelopment of Amaravati Buddhist Monastery in Great Gaddesden (C/2). However, it was requested that the planning requirements set out in Proposals C/1, C/2 and L/3 be strengthened to incorporate the need for developers to consult the Chilterns Conservation Board to ensure the impact of the development on the Chilterns AONB is given appropriate consideration at the planning application stage. These are reflected as minor changes to the Site Allocations DPD.

***Leisure and Cultural Facilities***

5.74 Another key omission identified through representations received from Hertfordshire County Council, landowners and organisations is the need to allocate land for detached playing fields in Tring. This was identified as a local objective within the Tring Place Strategy as part of the adopted Core Strategy but subsequently missed out of the Site Allocations DPD. In the event that they are required following expansion of Tring School, land at Dunsley Farm off London Road will be allocated to provide additional playing fields. The identification of this land has been confirmed in consultation with Hertfordshire County Council, as Local Education Authority and landowner, and the consequential change to the Site Allocations DPD has been identified as significant.

5.75 Sport England and Tring Sports Forum have also raised objection to paragraphs 7.12 and 7.13 which refer to conclusions of technical work completed by the Council in respect of the need for additional leisure facilities. The Council recognises that these paragraphs would benefit from further clarification and have recommended both minor and editorial changes. Such changes reflect the purpose and extent of the Outdoor Leisure Facilities Assessment Report completed in 2014 and role of the subsequent Playing Pitch Strategy and Action Plan which identifies priorities for the provision of future facilities for outdoor sports only. Since completion of the consultation exercise for the Site Allocations DPD, this Playing Pitch Strategy and Action Plan has been completed and was published in June 2015.

5.76 A number of representations were also received in respect of Open Land proposals. Whilst Berkhamsted Town Council expressed their support for designating Edgeworth House in Berkhamsted, some local residents raised objection referring to the appropriateness of the land for residential development and identifying conflicting assessments of this site in terms of its justification for designation within the Background Issues Paper: Providing Homes and Community Services. Having reviewed the reasons behind proposals to newly designate this site as Open Land, a view has been taken that the site does satisfy the Council's strategy for designating Open Land. In particular it contributes to the special character of the Grade II* Listed Building and associated garden, is one of the few remaining green spaces within

Berkhamsted and enhances the existing Open Land designation running parallel to the Grand Union Canal which is immediately adjacent to the site. Therefore the Council are not proposing any changes to this proposed designation but recognises the need to provide further clarification within the relevant Background Issues Paper.

5.77 Objections were also raised by local residents regarding the retention of designated Open Land at St Mary's Convent in Boxmoor, Hemel Hempstead and Woodhall Lane, Adeyfield. It was suggested that both of these sites would be suitable for residential development; however, this is the first instance representations have been received questioning the ongoing value of retaining these particular sites as Open Land. Therefore the Council has had no cause to reassess these (or other) sites specifically. During previous open space studies these existing designations were rolled forward (on the presumption that they continued to form important green infrastructure within towns and villages) in addition to considering new sites or amended boundaries only. As such no changes are proposed to these existing designations through the Site Allocations DPD.

**Chapter 8: Enhancing the Natural Environment**

5.78 Only two comments were received on this section: from the National Trust and Natural England. Both were supportive, with Natural England highlighting in particular their support for the recognition of the importance of the Chilterns Area of Outstanding Natural Beauty (AONB), landscape character and the hierarchy of biological and geological designations within the Borough.

**Chapter 9: Conserving the Historic Environment**

5.79 Relatively few comments were received on this section. These were equally split between those of support and objection. Areas of concern related to the impact of removing the LA5 site from the Green Belt upon the character of Tring Park and Tring Cemetery (which is proposed for designation as a Locally Registered Historic Park and Garden).

5.80 Objections were also made to the proposed Locally Registered Historic Park and Garden at Shendish Manor. However, these objections largely related to the proposed extent of the site: which was erroneously shown as covering a far greater area than intended. This error has been rectified through a minor change to the plan.

5.81 Historic England (formerly English Heritage) stated their particular support for the following:

- Background Issues Paper on Looking After the Environment;
- The recognition and mapping of newly identified Scheduled Ancient Monuments and Areas of Archaeological Significance;
- The identification of locally designated Historic Parks and Gardens; and
- The commitment to produce a list of locally listed buildings and other non-designated heritage assets.

**Chapter 10-17: Place Strategies**

5.82 These sections pull together the schedules of proposal sites and designations affecting each of the towns, large villages and the wider countryside, and show these in diagrammatic form on the relevant place diagram.

**Chapter 18: Monitoring and Review**

5.83 The only representations received in response to Chapter 18 were those of support. These included a reiteration of Thames Water's concerns about the waste water infrastructure within certain parts of Dacorum (as noted above); as well as support from both Hertfordshire County Council and Natural England regarding the co-ordination of infrastructure delivery alongside development.

**Appendices**

5.84 Changes to the appendices are largely minor and required as a consequence of comments received and changes proposed to the main sections of the plan.

## 6. SUSTAINABILITY APPRAISAL (INCORPORATING STRATEGIC ENVIRONMENTAL ASSESSMENT)

6.1 A Sustainability Report (including Strategic Environmental Assessment as required under European law), accompanied the Pre-Submission Site Allocations. SA specific representations were made by the following organisations/individuals:

- Natural England;
- Hertfordshire County Council Ecology Officer
- Boyer Planning on behalf of W. Lamb Ltd

6.2 Comments on the SA are summarised Annex B: Table 5(b). As a result of comments received on the Pre-Submission draft, the Council's independent consultants, C4S, have assessed the changes proposed and have also responded to comments made on the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) process itself. The results of these assessments are published in the form of an addendum to the September 2014 report – referred to as the Dacorum Local development Framework Site Allocations – Focussed Changes: Sustainability Report Addendum (July 2015).

6.3 The Council's consultants advise that the changes now proposed to the Pre-Submission Site Allocations document will have a largely neutral impact on the sustainability performance of the plan, as most changes relate to detailed wording changes, rather than changing the scale or broad direction of planned development. In addition it has been confirmed that the changes proposed will not alter the conclusions of the Habitats Regulations Assessment (HRA).

## 7. RELATIONSHIP WITH LOCAL ALLOCATION MASTER PLANS

7.1 Consultation on draft masterplans for the six Local Allocations took place in parallel with the formal representations process for the Pre-Submission Site Allocations DPD.

7.2 Due to their intended status as Supplementary Planning Guidance (SPG), the master plans are not subject to formal independent Examination. However, they will form important contextual information and it is important that the Inspector is made aware of the concerns raised by residents and other interested parties in the consultation responses to these draft documents.

7.3 Many of the comments and concerns raised on the Local Allocations draft master plans are equally applicable to the Local Allocation Policies within the Site Allocations document itself. Indeed, most local objections with regard to the Local Allocations were directed towards these documents rather than the Site Allocations DPD itself. In drawing up the proposed changes Policies LA1-LA6 Officers have therefore had regard to the master plan feedback. These issues will be summarised in a separate Report of Consultation, which will be written up in a separate Report of Consultation for consideration by Cabinet in September 2015.

7.4 The intention is to include the draft master plans (with any amendments Cabinet require) and the associated Report of Consultation as part of Submission documents to ensure the Site Allocations Inspector is aware of issues raised, and to request their adoption by full Council at the same time as the Site Allocations is reported for final approval. This will enable any changes required by the Site Allocations Inspector to the Local Allocation policies to be reflected in the wording of the final masterplans, and to avoid any contradictions in requirements for the sites that may otherwise arise.

## 8. SUBSEQUENT MEETINGS AND TECHNICAL WORK

### Duty to Co-operate Issues

8.1 The Council's activities under the 'Duty' to Co-operate' are outlined in a separate Duty to Co-Operate Report prepared to accompany publication of the Pre-Submission Site Allocations DPD (September 2014):

http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations/site-allocations-2014

8.2 This Report will be updated to include subsequent liaison and includes as part of the Submission documents passed to the Planning Inspectorate.

### Infrastructure Considerations

8.3 Liaison with infrastructure providers has continued during and following the Pre-Submission consultation. In order to ensure that all infrastructure issues raised were fully addressed, the Council has prepared an update to its Infrastructure Delivery Plan (InDP) (June 2015).

http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base

8.4 This update involved meetings with key infrastructure and service providers including:

- Primary Care Trust (PCT)
- West Herts Hospital Trust,
- Thames Water
- Environment Agency (EA)
- Highway Authority (HCC)
- Children's Schools and Families Unit (HCC)
- Highways Agency (now Highways England)
- Hertfordshire Property (HCC)

8.4 Despite concerns over the capacity of infrastructure being a recurring theme of objections to the Pre-Submission Site Allocations (particularly with regard to the Local Allocations), providers have confirmed that there are no infrastructure 'showstoppers' that would prevent delivery of the future development planned, subject to the timely delivery of new infrastructure. Where appropriate, specific advice received is referred to within Annex B: Table 3 of this report. Key concerns and the Council's proposed response (agreed with infrastructure providers as appropriate) are summarised in Table A: Summary of Key Issues Raised and Proposed Response above.

8.5 The only outstanding infrastructure issue relates to comments from the Environment Agency regarding waste water / sewerage capacity. It should be noted that comments of support were initially submitted to the Council. Objections were only raised after the close of the Site Allocations consultation period. Whilst the Council's legal adviser has advised that this means such

comments do not need to be included within the Report of Representations, they have been reported for completeness. Outstanding issues will be set out within a Statement of Common Ground to be drawn up between the EA, Thames Water (as the sewerage infrastructure provider) and the Council. This will set out areas of agreement between the parties and those areas where the Council and Thames disagree with the EA's position.

8.6 The EA's concerns are not considered to be valid on a number of planning and legal grounds:

1. Their comments were not received within the specified representations period;
2. They relate to the overall quantum of development, rather than raising any concerns regarding individual sites. Such strategic level concerns should have been raised at the Core Strategy stage. Instead comments of support were received from the EA at this time.
3. Thames Water supports the Council's approach as set out in the Site Allocations (as amended by a series of minor changes).
4. The technical work required by the EA is already underway on a county-wide basis and will be available to inform the early partial review of the Core Strategy. The EA and Thames Water are both involved with this work.

8.7 Copies of relevant minutes form these meetings, or associated correspondence is attached as Appendix 7.

8.8 The Council has also discussed issues raised with other relevant specialists. A summary of these discussions is set out in Table C below:

**Table B: Summary of Post Consultation Discussions with Specialists**

| Individual / organisation | Area(s) of discussion* | Outcome(s) |
|---|---|---|
| Ecology Advisor, Hertfordshire Ecology | Approach to extension to Shrubhill Common and Green infrastructure on Local Allocation LA3 | No change required to Site Allocations DPD. Consider further clarification through site master plan. |
| Gypsy and Traveller Unit at Hertfordshire County Council | Discussion regarding issues raised regarding Council's approach towards provision of new pitches and the location of new sites | Support for Council's approach reiterated. No changes required to Site Allocations DPD, although the removal of the Tring site from the Green Belt is proposed as a significant change as a result of recent High Court decision (see above). |

| | | |
|---|---|---|
| Hertfordshire Gardens Trust | Liaison regarding response to objections to designation of Shendish Manor as Locally Designated Historic Park and Garden. | Information provided has been incorporated into Council's response in Annex B: Table 3. |
| Local Allocation landowner meetings | Update meetings have been held with landowners / representatives for LA1, LA3, LA5 and LA6, to discuss issues arising through the Pre-Submission consultation. LA5 meeting involved Dacorum's Cemetery manager. There have been verbal / email updates with the representatives from LA4. (Dacorum Borough Council owns LA2). | Minor changes to Local Allocations Policies within Site Allocations discussed, together with the need for potential changes / clarification to associated draft master plans. |
| Attwater Jameson Hill | Advice on legal matters pertaining to the Site Allocations DPD. | Advice is incorporated into responses to issues and changes proposed to Site Allocations DPD. |

** Note: Summary only includes areas discussed post-Pre-Submission consultation.*

**Changes in advice / information since Pre-Submission stage**

8.8 Since the Pre-Submission Site Allocations DPD was published for consultation, there have been a number of Government statements and legal judgements on planning issues which the Council has taken into account when preparing its responses to the consultation.

<u>Government Guidance</u>

*Green Belt policy*

8.9 A number of consultation responses (from both individual and developers) cited the Ministerial Statement (4 October 2014) and associated wording changes to the Planning Practice Guidance (PPG), as indicating a change in Government policy with regard to the Green Belt. As a consequence they considered that the Site Allocations as written was contrary to the NPPF or somehow 'illegal' as a result. The Council has taken legal advice on this issue and this advice confirms that no such policy change has occurred with regard to the Council's plan-making function.

8.10 Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. The Green Belt has always been a constraint that has been taken into account

when deciding how far the Council can go in meeting the area's objectively assessed need[1] (OAN) and continues to be so.

8.11 It is however important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy. A key role of the Site Allocations DPD is to take forward the strategic policies and targets relating to housing within the Core Strategy and ensure that these are delivered on the ground. It is the role of the early partial review (in the form of a new single Local Plan) to look again at longer term needs and take account of a whole range of Government policies and guidance, including those relating to housing and the Green Belt.

8.12 Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to "*significantly boost the housing supply"* (para. 47). In considering these points, Councils are expected to meet their *"objectively assessed needs"* for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.

8.13 The Council understands that changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making (planning application) rather than the plan-making process. The changes do not affect how plans that are already adopted, such as the Core Strategy and the proposals that they contain are implemented.

8.14 Therefore, there has been no fundamental change in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council progresses the Site Allocations DPD.

*Cemeteries in the Green Belt*

8.15 The Council's legal adviser has also highlighted that there has been recent clarification regarding the Government's approach to cemeteries in the Green Belt (as set out in the NPPF) through a judgement from the Court of Appeal[2]. In contrast to the advice above, this change does result in a recommended change to the Site Allocations DPD. This High Court judgment clarifies that cemeteries are considered as inappropriate development within the Green Belt in terms of the definitions in the NPPF. This is because cemeteries are not listed in the text of the NPPF (paragraphs 89 and 90) as categories of development which are 'not inappropriate'. However, rather counter-

[1] This is most simply explained as the demand for housing (of all types and tenures) that an area's population would demand if this were not constrained any planning policies.

[2] Timmins and Lymn Family Funeral Service v. Gedling Borough Council and Westerleigh Group. Judgement issued March 2014.

intuitively, new buildings providing appropriate facilities for cemeteries are classified as appropriate development.

8.16 As a result of this case, the Council's legal adviser recommends that the cemetery extension site that forms part of Local Allocation LA5 is excluded from the Green Belt in the Site Allocations document. He has also advised that for consistency with the approach to the cemetery, and the approach to the Gypsy and Traveller Sites on LA1 and LA3, the adjacent Gypsy and Traveller site is also excluded from the Green Belt.

Technical Information:

8.17 Since publication of the Pre-Submission Site Allocations document, a limited number of new technical studies have also been completed and published:

- Re-run of the Hemel Hempstead Transport Model (2015), to ensure this includes the latest available information regarding the expected scale and location of new development within the town.
- Infrastructure Delivery Plan (June 2015), an update to the previous 2014 report, to ensure that infrastructure issues raised through the Pre-Submission consultation process are discussed and addressed with service providers (se summary above).
- Leisure Facilities Assessment (September 2014) and associated Playing Pitch Strategy Action Plan (June 2015).

8.18 These documents are referred to where appropriate within Annex B: Table 3, with further information provided in the updated versions of the Background Issues Papers (dated June 2015) that accompany the Site Allocations document. None indicate the need for any significant changes (SCs) to the Site Allocations DPD itself, although some minor changes (MCs) are proposed (see below).

8.19 A number of other technical studies are also underway, relating to housing, employment and the Green Belt. However, as these studies are to inform the early partial review of the Core Strategy (and production of a new Local Plan for the Borough), they are not relevant to the Site Allocations process.

8.20 Officers are also in the process of completing and checking the latest housing and employment monitoring information (for the 2014/15 financial year). This information will be published in the form of Land Position Statements and used to make factual updates to the figures contained within the Site Allocations DPD and associated Background Issues Papers. This will ensure that the Inspector has the latest information available i.e. a base date of information at April 2015 rather than the current base date of April 2014.

## 9. CHANGES PROPOSED

9.1 A number of changes are proposed to the Site Allocations DPD as a result of representations received through the consultation, and also as a result of advice from the Council's legal adviser and discussions with infrastructure providers. These changes fall into 3 categories:

| | | |
|---|---|---|
| **MC** | Minor Change | Changes of a minor nature that are required to reflect amendments referred to in Table 3, or as a consequential change from changes referred to in Table 3. Some minor changes follow minor changes arising from the representations. |
| **E** | Editorial Change | Editorial changes are intended to clarify meaning, update facts and correct any inaccuracies. All editorial changes are minor changes in nature. Some editorial changes follow minor changes arising from the representations. |
| **SC** | Significant change | Changes of a more significant nature that are required to reflect amendments referred to in Table 3, or as a consequential change from changes referred to in Table 3. Significant changes usually relate to the inclusion of a new proposal site or a more substantial change to the wording or boundary of a designation or proposal. |

9.2 Most changes proposed are either editorial (E) or minor in nature (MCs) that that don't affect the thrust of the plan. There are however a number of changes that are more significant in nature (SCs). The latter are shown below by settlement in Table C below:

**Table C: Significant Changes proposed (by settlement)**

| SC reference(s) | Summary of Change | Reason |
|---|---|---|
| **Hemel Hempstead** | | |
| SC2 | Designation of a new Major Developed Site (MDS) at Abbots Hill School, Hemel Hempstead | As a result of representations made on behalf of the school and to ensure consistency in approach with other MDS designations already included within the Core Strategy. |
| SC6 | Changes to planning requirements for Proposal S1 – Jarman Fields | As a result of representations and to better explain the restrictions to the sale of goods that are considered appropriate in this out of centre location. |
| SC13 | Amended Historic Park | As a result of representations and to |

| | | |
|---|---|---|
| | and Garden designation at Shendish | correct a mapping error. |
| **Tring** | | |
| SC1 | Amending extent of Green Belt release relating to Local Allocation LA5 (GB/9) in Tring | As a result of representations, to reflect legal advice regarding the implications of the Timmins legal judgement (referred to above) and to ensure consistency in the approach towards Gypsy and Traveller sites at LA1, LA3 and LA5 (i.e. that these are removed from the Green Belt and their anticipated extent shown on the indicative layout map that forms part of the relevant Local Allocation policy). |
| SC10 & SC12 | New detached playing fields at Dunsley Farm - additional text and new Leisure designation | As a result of representations and to take forward the express intent of the Core Strategy for the provision of detached playing fields to serve Tring Secondary School, should this school expand further. |
| SC7 | Amendments to LA5 policy text | |
| SC8 | Changes to LA5 indicative layout | |
| SC11 | Amended L/3 LA5 leisure space | |
| **Kings Langley** | | |
| SC3 | Defining an 'infill area' for Kings Langley School Major Developed Site | To reflect the recent planning permission for the redevelopment of the school site and ensure consistency of approach with other Major Developed Sites in the Borough. |
| **Other** | | |
| SC4 | Changes to Bourne End Mills Major Developed Site | As a result of representations and to ensure the boundary (external and infill) better reflects existing permissions and boundaries on the ground. |
| SC5 | Changes to Bourne End Mills employment area in the Green Belt | To ensure consistency with the MDS designation above. |
| SC9 | Amended wording to Policy SA10: Education Zones | As a result of representations, and to ensure the scope of the policy is clear. |

9.3 Paragraph 6 of the 'Examining Local Plans Procedural Practice' issued by the Planning Inspectorate in December 2013 states:-

*'LPAs should rigorously assess the Plan before it is published under Regulation 19 to ensure that it is a Plan which they think is sound. The document published should be the document they intend to submit under Regulation 22 to the Planning Inspectorate, subject to any further changes to the draft arising from the Regulation 19 Consultation. These changes should be further consulted on and subject to sustainability appraisal before submission. The Planning and Compulsory Purchase Act 2004 specifically provides that an LPA must not submit the Plan unless it considers that the document is ready for Examination. Main modifications after submission will only be considered where they are necessary to make the Plan sound and/or legally compliant and where the LPA has formally requested that such modifications be recommended by the Inspector'.*

9.4 Whilst this consultation only needs to focus on the changes that fall within the 'significant changes' (SC) category, the Council will take the opportunity to seek feedback on all of the changes proposed, apart from these that are purely editorial in nature (denoted by the E prefix). This will take the form of a 'Focussed Changes' consultation.

9.5 The outcome of this Focussed Changes consultation will be summarised in an Addendum Report of Representations Addendum.

# ANNEX A: METHOD OF NOTIFICATION

# Appendix 1: Advertisements (including formal Notice) and press articles

# Help shape our growing borough

Give us your views on how Dacorum will grow and develop up to 2031.

We would like your views on plans for how sites identified in our planning blueprint, the Core Strategy, will be built. We've set out the details in in our Site Allocation, which includes;

- Areas designated for different uses, such as housing sites and shopping area
- Locations where new development will be restricted
- Plans for the six Green Belt (Local Allocation) housing sites identified in the Core Strategy.

For consultation documents and more information go to www.dacorum.gov.uk/siteallocations. Also available at local libraries and at Hemel Hempstead and Berkhamsted Civic Centres, and Victoria Hall, Tring. The deadline for comments is Wednesday 5 November 2014 at 5.15pm.

## Find out more at public exhibitions

**Between 2pm and 8pm**

**Monday 13 October:**

Civic Centre, Marlowes, Hemel Hempstead, and

Bovingdon Football Club, Green Lane, Bovingdon

**Tuesday 14 October:**

Temperance Hall, Christchurch Road, Tring

**Wednesday 15 October:**

Main Hall, Civic Centre, High Street, Berkhamsted

**Friday 17 October:**

Warners End Community Centre, Northridge Way

**More information at www.dacorum.gov.uk/siteallocations**
**Contact strategic.planning@dacorum.gov.uk or call 01442 228000 and ask for Strategic Planning**

# The Gazette:
# Wednesday, 24 September 2014

**Dacorum's Local Planning Framework**

**Pre-Submission Site Allocations Development Plan Document (DPD)**

**Notice of Consultation and Statement of Representations Procedure**

This notice is provided in accordance with Regulation 19 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012.

The title of the document which the Council intends to submit to the Secretary of State is the Dacorum 'Pre-Submission Site Allocations'. The Site Allocations DPD is the second part of the Council's new local plan. Its principal role is to deliver the objectives of the Core Strategy, by establishing detailed proposals and requirements for particular sites and areas. It allocates sites for future development in the Borough; defines the boundaries of planning designations; and ensures appropriate infrastructure is identified and delivered alongside new development.

The Pre-Submission Site Allocations has been published for a six week period. Representations must be received by the Council between Wednesday 24th September and **5.15pm Wednesday 5th November 2014.**

Representations can be made in writing, on the prescribed forms, to the Strategic Planning and Regeneration Team, Dacorum Borough Council, Civic Centre, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1HH; via electronic communication using the Council's online planning portal; or by emailing the prescribed form to strategic.planning@dacorum.gov.uk

Representations may be accompanied by a request to be notified of any of the following: (a) that the Site Allocations has been submitted to the Secretary of State for independent examination, (b) that the person appointed to carry out the independent examination has published their recommendations and/or (c) that the Core Strategy has been formally adopted by the Council.

Copies of the Pre-Submission Site Allocations and the representation form are available:

- on the Council's website www.dacorum.gov.uk/planning
- via the Council's consultation portal;
- at public libraries within the borough during normal opening hours; and
- at Borough Council's offices during the following opening hours:

| Civic Centres | Berkhamsted | Hemel Hempstead | Tring |
|---|---|---|---|
| ***Monday*** | 9am-12.30pm and 1.30pm-5pm | 8.45 am - 5.15 pm | 9am-12.30pm and 1.30pm-5pm |
| ***Tuesday*** | 9.30am - 2pm | 8.45 am - 5.15 pm | CLOSED |
| ***Wednesday*** | CLOSED | 8.45 am - 5.15 pm | 9.30pm-2pm |
| ***Thursday*** | 9.30am - 2pm | 8.45 am - 5.15 pm | CLOSED |
| ***Friday*** | 9.30am - 2pm | 8.45 am - 4.45 pm | 9.30pm-2pm |

Please contact the Strategic Planning and Regeneration team at strategic.planning@dacorum.gov.uk or phone 01442 228072 if you have any questions.

0844 4993225 www.stalbansreview.co.uk

## Public Notices

### Dacorum's Local Planning Framework
### Pre-Submission Site Allocations
### Development Plan Document (DPD)

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Please contact the Strategic Planning and Regeneration team at strategic.planning@dacorum.gov.uk or phone 01442 228072 if you have any questions.

# Hemel Gazette 1 October 2014



## COMMENT

**SPEAKER'S CORNER**

# Meeting the demand for new housing is council's most difficult challenge

WRITTEN BY
ANDREW WILLIAMS
Dacorum Borough Council Leader

One of the most difficult challenges facing local councils across the country and especially in the South of England is the challenge of meeting the demand for new housing.

The government requires us to plan to meet the needs of our Borough and with people generally living longer and increasing numbers of people living alone the demand for more homes continues to increase.

Here in Dacorum we have been working on our local plan, the Core Strategy for several years and last year this was approved by the planning inspector.

This plan is a blueprint for where new housing as well as leisure, retail and other community facilities should be developed between now and 2031.

Whilst Dacorum has so far been successful in keeping the vast majority of new developments on previously developed (brownfield) sites this is becoming increasingly difficult as sites are redeveloped to provide new housing or commercial space.

In order to provide the housing the borough needs we have had to take the difficult decision to release some Green Belt sites for housing.

In the Core Strategy these sites are identified as Local Allocations (LA sites) and last week we opened a consultation on how these sites should be developed to provide a mixture of new housing, shopping and other facilities such as schools and community buildings.

Plans also include a minimum provision for 35% affordable housing, vital to help the many local people on Dacorum's housing register who are seeking housing to rent.

Whilst the principal of developing these sites has been agreed, the details of how they will be developed is still to be decided and that is why we are now seeking your views on the proposals.

> **Government requires us to plan to meet the needs of our borough and with more people and people living longer, demands are increasing**

Over the next few weeks there will be exhibitions across the borough and I hope you will take the opportunity to visit and make your comments.

Consultation documents and more information are online at www.dacorum.gov.uk/siteallocations.

Information is also available in local libraries and at Hemel Hempstead and Berkhamsted Civic Centre and Victoria Hall, Tring.

Of course the Core Strategy is about more than just housing numbers, it seeks to ensure that other infrastructure needs are meets.

As the local council and planning authority we can meet some of those needs, others will be provided by other agencies and most of us would agree that hospital provision is the highest priority for Dacorum.

Unfortunately this is a matter for the NHS and not something that the council can directly control itself.

We do share all our new housing figures with other service providers to help them plan how they deliver their services for the residents of Dacorum, and we work with them to make sure the space can be found for these services to be provided.

The way our borough develops over the next 15 years is important for everyone and I hope that you will take the opportunity to visit our exhibitions or website to find out more and help influence the plans for development on these key sites.

## Poster for Warners End Community Centre

# Public Exhibition on Local Allocation LA3 – West Hemel Hempstead

## Exhibition on the Master Plan for land at West Hemel Hempstead

**Friday 17 October 2014**

Warners End Community Centre, Northridge Way

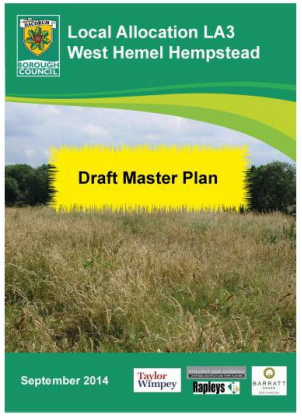
2-8pm

**All Welcome**

We would like your views on the draft Master Plan for Local Allocation LA3.

The proposal includes about 900 homes, a shop, doctors surgery, new open space/playing fields, a traveller site of 7 pitches and additional social and community provision, including a new primary school.

For consultation documents and more information go to www.dacorum.gov.uk/siteallocations. Documents are also available at local libraries and at Hemel Hempstead and Berkhamsted Civic Centres, and Victoria Hall, Tring. The deadline for comments is Wednesday 5 November 2014 at 5.15pm.




**More information at www.dacorum.gov.uk/siteallocations**
**Contact strategic.planning@dacorum.gov.uk or call 01442 228000 and ask for Strategic Planning**

## Poster advertising additional exhibition date for Grovehill

# Public Exhibition on Site Allocations and Local Allocation LA1 – Marchmont Farm Hemel Hempstead

## Exhibition on the Site Allocations document and Master Plan document for land at Marchmont Farm Hemel Hempstead

**Thursday 23 October 2014**

Grovehill Community Centre

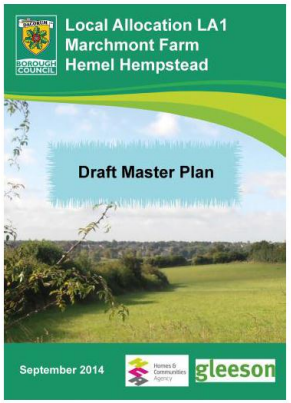
2-8pm

We would like your views on the draft Master Plan for Local Allocation LA1.

The proposal includes between 300 and 350 homes. Areas are set aside for open space, a shop, doctors surgery, new open space/playing fields, a traveller site of 5 pitches and additional social and community provision, including a new primary school.

For consultation documents and more information go to www.dacorum.gov.uk/siteallocations. Documents are also available at local libraries and at Hemel Hempstead and Berkhamsted Civic Centres, and Victoria Hall, Tring. The deadline for comments is Wednesday 5 November 2014 at 5.15pm.

**More information at www.dacorum.gov.uk/siteallocations**
**Contact strategic.planning@dacorum.gov.uk or call 01442 228000 and ask for Strategic Planning**



# Appendix 2:  Dacorum Digest article

# Dacorum Digest Autumn 2014



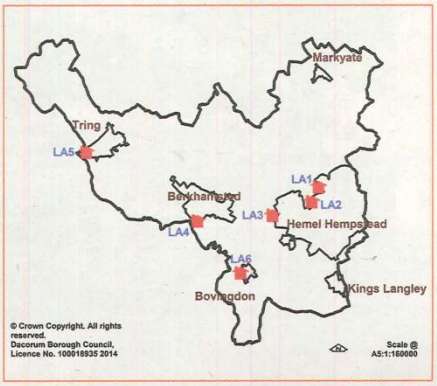
# Your views on detail of new development plans

**Our Core Strategy – setting out the planning blueprint for Dacorum Borough for the next 20 years – was adopted last September.**

We're now looking at the detail of how the sites allocated to different types of development within the Strategy will be developed, in what's known as a Site Allocations document. The document includes details about areas designated for different uses and development, such as housing sites and shopping areas, and locations where development will be restricted, such as in the Chilterns Area of Outstanding Natural Beauty.

The Site Allocations document also provides further details on the six Green Belt (Local Allocation) housing sites identified in the Core Strategy (see map and box below).

Cllr Andrew Williams, Leader of the Council says "We have had to make difficult decisions over how we accommodate the needs of our growing population, particularly regarding the level of new homes, and have reluctantly released some allocated Green Belt land to support this. We need your views on our plans to make sure that our communities can continue to influence the responsible development of the borough and plan for a Dacorum that we can all be proud of."




**The Local Allocations will play a key role in providing new homes, together with other supporting uses and facilities:**

## Hemel Hempstead

**LA1: Marchmont Farm, Grovehill**

- 300-350 new homes;
- traveller site;
- extension to Margaret Lloyd Park;
- contribution to local transport network, education and community uses.

**LA2: Old Town**

- 80 new homes and open space.

**LA3: West Hemel Hempstead**

- up to 900 new homes;
- traveller site;
- a new community hub;
- a new primary school;
- significant open space;
- extension to the doctors surgery.

## Berkhamsted

**LA4: Land at and to the rear of Hanburys, Shootersway**

- 40 new homes and open space.

## Tring

**LA5: Icknield Way, west of Tring**

- 180-200 new homes;
- traveller site;
- open space;
- extension to the employment area;
- new cemetery space.

## Bovingdon

**LA6: Chesham Road and Molyneaux Avenue**

- 60 new homes and open space.

## Have your say

We'll be publishing the proposed Site Allocations document and master plans for the Local Allocations for consultation for six weeks from Wednesday 24 September 2014. We'd like your views on these pre-submission documents to help ensure that the final versions continue to reflect, as far as possible, your views and those of the local community.

You can find out more about the site allocations and Local Allocation master plans and ask us your questions at public exhibitions this autumn. The exhibitions will be open from 2–8pm at:

| Date | Area | Venue |
|---|---|---|
| Mon 13 Oct | Hemel Hempstead | Civic Centre, Marlowes |
| Mon 13 Oct | Bovingdon | Bovingdon Football Club, Green Lane |
| Tue 14 Oct | Tring | Temperance Hall, Christchurch Road |
| Wed 15 Oct | Berkhamsted | Main Hall, Civic Centre, High Street |
| Fri 17 Oct | Hemel Hempstead | Warners End *Community Centre*, Northridge Way |

You can also see copies of the pre-submission Site Allocations document, the master plans, comments forms and background information online at **www.dacorum.gov.uk** at local libraries or at Borough Council Offices subject to opening times.

The deadline for us to receive your comments is **Wednesday 5 November 2014.**

For more information on the consultation process, the Site Allocations document and the master plans please see **www.dacorum.gov.uk/planning**, email **strategic.planning@dacorum.gov.uk** or call **01442 228000** and ask for Strategic Planning.

# Appendix 3: Example of Display Material for Exhibitions

*Note: Information contained on display boards was also available in A4 format to take away and/or post out on request to those who could not attend the exhibitions.*

# Site Allocations Overview Posters

## Site Allocations Overview

**We have been preparing Dacorum's new Local Planning Framework over the last eight years, asking for your feedback at key stages. The Core Strategy was the first of the documents that make up the Local Planning Framework for the Borough. It sets out the strategic planning policies for the Borough and was adopted by the Council in September 2013.**

### What is the Site Allocations document?

The Site Allocations Development Plan Document (DPD) is the next part of the Framework. Its principal role is to deliver the objectives of the Core Strategy, by forming detailed proposals and requirements for identified sites and areas. It:

- allocates sites for future development in the Borough;
- defines the boundaries of planning designations; and
- ensures appropriate infrastructure is identified and delivered alongside new development.

### What are we consulting on?

We would like your feedback on the draft version of the Site Allocations document (known as the Pre-Submission document).

The Site Allocations Development Plan Document (DPD) is in two parts - a written statement and a map book. The written statement contains policies identifying sites for particular uses and special requirements for those sites. It is split into four main sections to mirror the format of the Core Strategy:

- The Sustainable Development Strategy;
- Strengthening Economic Prosperity;
- Providing Homes and Community Services; and
- Looking After the Environment.

There are also detailed 'Place Strategies' for each town and the countryside.

The Map Book shows amendments and additions required to the existing Policies Map (also known as Proposals Map) that accompanies the Dacorum Borough Local Plan.

The Site Allocations document provides further details on the six Green Belt (Local Allocation) housing sites identified in the Core Strategy.

### How will this document be used when considering planning applications?

While it is in draft form, the Site Allocations document will not have the same significance as the current adopted plan (made up of the Dacorum Borough Local Plan and the Core Strategy). However, it will be taken into account by the Council when making decisions on relevant panning applications.

1

# Site Allocations Overview


## When will the document be adopted?

This document is at 'Pre-Submission' stage. This means that following this consultation, the document will be sent to the Planning Inspectorate for Examination. The Inspector will also be given a copy of all comments made on the document as part of this consultation.

Only when the document is found 'sound' by the Planning Inspector can it be formally adopted by the Council. We expect to adopt the Site Allocations document, together with the Local Allocation master plans in early 2016.

Once adopted, the planning policies and associated designations within the Site Allocations document will be used to determine planning applications, together with policies in the Core Strategy and relevant development management policies.

# Site Allocations Overview

## What does the Site Allocations document include?

The structure and content of the Site Allocations DPD reflects the sections within the Core Strategy. Here is a summary of what is covered in each section:

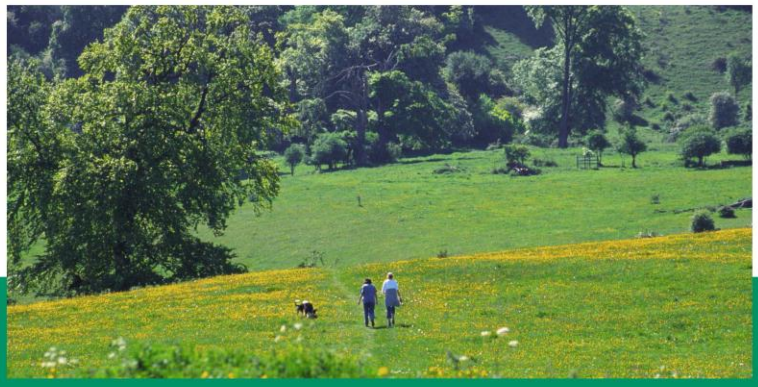
**The Sustainable Development Strategy –** This section sets out the boundaries relating to the Green Belt, Rural Area, major developed sites in the Green Belt and individual towns and villages. These boundaries are important as they affect the approach that will be taken to development in different locations. In recognition of the increased role of 'mixed use' schemes within the Borough, some mixed use development sites are also identified. These will deliver a range of complementary uses as part of their development or redevelopment. Sites for transport uses are also identified.

**Providing Home and Community Uses –** One of the main functions of the Site Allocations DPD is to identify how sites can help to meet the housing target, which is set out in the Core Strategy. Key housing sites are identified, detailed requirements set for the Local Allocation sites, and specific provision is also made for travelling communities. In order to ensure appropriate supporting infrastructure is provided to support residents and workers, there are also sites specifically identified and protected for community and leisure uses and open land.

# Site Allocations Overview

**Promoting Economic Prosperity –** We have reviewed employment use allocations and designations within the Borough. The review sought to ensure that there is enough good quality employment land available to meet the Core Strategy's employment targets (for offices and industrial, storage and distribution floorspace) and considered opportunities to reallocate some employment land for housing development. This work has also sought to ensure the uses permitted in designated employment areas remains appropriate in terms of their character and current market demands and supports growth in local economic prosperity. Following changes in national policy on retail matters, we have taken the opportunity to update our approach to the main retail centres, and in particular e have redefined the role and extent of protected shopping frontages within the Borough's three town centres. The approach to the Borough's local shopping centres remains unchanged.

**Looking after the Environment –** This section identifies designations relating to landscape, biodiversity and historic heritage that are illustrated on the Policies Map and updates them where necessary. Some designations are defined locally by the Council, in consultation with our advisers, whilst others reflect designations that are set at a national or European level.



# Local Allocations Overview posters

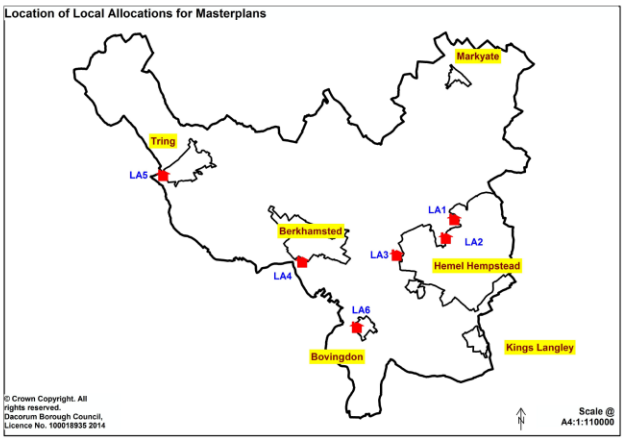
## Local Allocations Overview

**Our Core Strategy includes six Local Allocations (Green Belt housing sites identified for housing and other associated uses). In conjunction with the landowners, we have prepared draft master plans for each Local Allocation which provide information and guidance on the design and layout of the sites. We would like your views on these draft master plans alongside our consultation on the main Site Allocations document.**

### Where are the sites covered by the master plans?

The master plans cover the following sites:

- LA1 Marchmont Farm, Hemel Hempstead;
- LA2 Old Town, Hemel Hempstead;
- LA3 West Hemel Hempstead;
- LA4 Hanburys, Berkhamsted;
- LA5 Icknield Way, West of Tring; and
- LA6 Chesham Road / Molyneaux Avenue, Bovingdon.




### What is the purpose of the Local Allocation master plans?

The role of the master plans is to:

- elaborate on the development principles (contained in the main Site Allocations document) that will guide development;
- show an indicative site layout;
- provide information about delivery and phasing of the site; and
- provide more explicit advice regarding what infrastructure contributions will be required for the development.

In most cases, development of the Local Allocations sites will not happen for a number of years (with the first houses being completed from 2021 onwards). At this stage the master plans don't go into great detail regarding the design and form of development at each site. The detail will be part of the planning application when that is made.

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# Local Allocations Overview

### What will the master plans be used for?

The master plans will be used to help us decide whether to approve future planning applications for each site, when these are submitted by the developers. As most of the sites are quite large, and also in sensitive locations, master plans allow us to be specific about what is required from the landowners and developers.

### How have local people and local organisations influenced the master plans so far?

There have been a number of opportunities to comment on the master plans and the technical information that has informed them. Our consultation so far has included:

- Previous consultation on our **Core Strategy,** where the Local Allocations were chosen for development.
- A series of **workshops** or meetings on each Local Allocation in May 2013, and, in the case of LA3: West Hemel Hempstead, by wider public consultation on 'Shaping the Masterplan' in summer 2013.
- Separate meetings with **community groups,** the **Grovehill neighbourhood forum**, and **town and parish councils** which have helped to increase our understanding of site constraints, opportunities and particular issues of local concern.
- We have had regular meetings with the **landowners and developers** over the last two years to discuss the sites and try to agree how to address key issues in the master plans.
- Where necessary we have sought further **technical advice** from experts, regarding schools, highways, archaeology and sustainable drainage.

# Local Allocations Overview

## When will development start at these sites?

Five of the six sites are due to deliver new homes from 2021. The main Site Allocations document sets out when each of the Local Allocation sites will come forward for development. Planning applications for the sites will need to be submitted by the developer and considered by the Council before this date.

The exception is Local Allocation LA5: Icknield Way, west of Tring, which is needed to meet the needs of Tring before 2021.


## What happens next?

As the master plans do not have the same legal status as the main Site Allocation document, they do not need to be examined by an independent Planning Inspector. We will consider your comments and make any necessary changes.

There is however a policy for each Local Allocation within the Site Allocation document. This reflects key information from the master plans and will be subject to independent Examination.

We expect that the master plans will be formally agreed by the Council at the same time as the Site Allocations document is formally adopted. This is expected in early 2016.

The following information relates to the Local Allocation(s) that relate to your immediate local area. If you would like to see information about any of the other Local Allocations, please ask.

# Place Strategy posters example – for Tring


Tring is the Borough's third largest town and plays an important role in meeting local housing needs and providing employment opportunities.

The vision and local objectives for Tring are set out in the Core Strategy, and provide a broad framework against which to judge development proposals. The most significant new site identified in the Site Allocations for Tring is Local Allocation LA5 (Land at Icknield Way, West of Tring). There are also three other housing proposals included within the schedule for Tring, together with several other development proposals and designations to support new homes and employment opportunities.

Further information on each is set out in the Site Allocations document itself. We would welcome your feedback on these.

**Schedule of sites for Tring:**

| | | |
|---|---|---|
| **Transport** | | |
| Proposal T/20 | Tring Railway Station | Existing protected site for transport facilities. |
| Proposal T/21 | Local Allocation LA5, Icknield Way | New highway improvement works related to the provision of 180-200 new homes. |
| Proposal T/22 | Tring Station to Pitstone | Provision of improved cycle connections. |
| Employment | | |
| Proposal E/1 | Icknield Way, Tring | New extension to existing employment designation. |
| Housing | | |
| Proposal H/18 | Miswell Lane | New housing development site. |
| Proposal H/19 | Western Road | Existing protected housing development site carried forward to allow completion of remaining area. |
| Proposal H/20 | Depot land, Langdon Street | New housing development site. |
| Local Allocation | | |
| Proposal LA5 | Icknield Way, west of Tring | New housing development site seeking to provide 180-200 new homes. |
| Social and Community | | |
| Proposal C/1 | Land west of Tring | Provision of new detached extension to Tring Cemetery. |
| Leisure | | |
| Proposal L/3 | Land in Local Allocation LA5: Icknield Way, Tring | New leisure space linked to Local Allocation LA5. |

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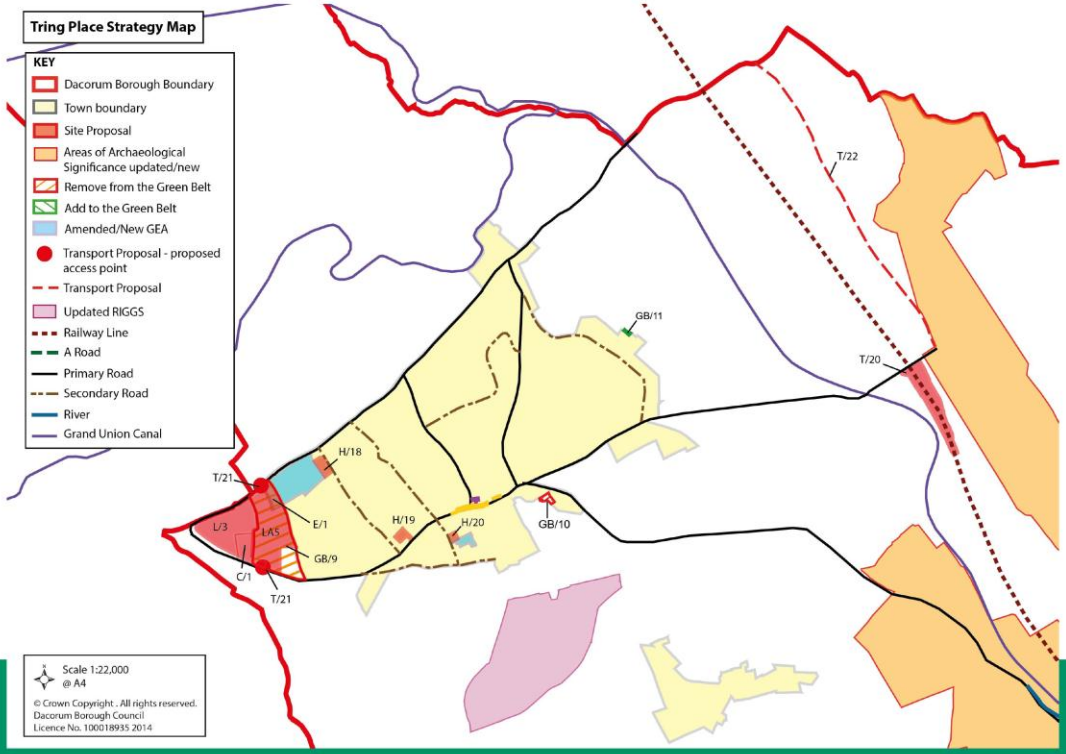
# Place Strategy—Tring

**Other new or amended designations or allocations:**

In addition to the above, some changes are also proposed to the boundaries of the Green Belt and existing sites, and some new boundaries are defined. Further information on each can be found in the main Site Allocations document.

| **Changes to Green Belt boundary** | **Changes to General Employment Areas (GEA)** |
|---|---|
| • GB/9 LA5 Icknield Way, west of Tring<br>• GB/10 Land at and adjoining Garden House, London Road<br>• GB/11 Land at Ridge View off Marshcroft Lane<br><br>**New Locally Registered Park or Garden of Historic Interest**<br>• Pendley Manor<br>• Tring Cemetery | • Akeman Street GEA (Policy SA5: General Employment Areas)<br>• Brook Street GEA (Policy SA5: General Employment Areas)<br>• Icknield Way GEA (Policy SA5: General Employment Areas) |

All of the sites and designations listed are shown on this map:



# Find Out More posters

## How To Comment

### How do I comment?

**We would welcome your feedback on both the main Site Allocations document and the draft master plans for the Local Allocations.**

**We would encourage you to submit your comments via our online consultation portal (details below), or if you prefer, there are questionnaires for each document which you can complete. You should use a separate form for each of the different master plans you wish to comment on, so that we are clear which site your comments relate to.**

| | |
|---|---|
| **Post** | Strategic Planning and Regeneration<br>Dacorum Borough Council<br>Civic Centre<br>Marlowes<br>Hemel Hempstead,<br>Hertfordshire<br>HP1 1HH |
| **Email** | strategic.planning@dacorum.gov.uk |
| **Website** | http://consult.dacorum.gov.uk/portal/ |

### Things to remember when commenting

Please be aware of the following when responding:

- The principle of allocating the Local Allocation sites for development has been agreed through the Council's Core Strategy, and this cannot be changed as a result of this consultation.
- The Council's overall housing and jobs targets have also been agreed – so we cannot change these until we carry out a full review of the plan (programmed for 2017/18).
- If you are objecting to any of the documents it would be helpful if you could say what changes you would like to see to the text or accompanying maps to resolve your concerns.
- All comments received will be publicly available, so cannot be treated as confidential.

### Where can I see copies of the full documents?

Copies of the master plans, together with the main Site Allocations document, comments forms and background information can be found on the Council's website www.dacorum.gov.uk/siteallocations, at local libraries or at Borough Council Offices during their usual opening times.

**The deadline for comments to be received by the Council is 5:15pm on 5 November 2014**

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# How To Comment

## Next Steps

- **For the main Site Allocations document……**

After the close of consultation, all comments received will be summarised in a 'Report of Representations.' If any significant new issues are raised, then these will be reported to the Council's Cabinet and Full Council, together with a recommendation on what to do next. This may result in further consultation on a limited number of sites and/or issues.

If no significant new issues are raised, then the Site Allocations and associated documents will be submitted to the Planning Inspectorate for formal Examination. Copies of all comments made as part of this consultation will also be passed to the Inspector. After, the Examination is over, the Inspector will pass his report to the Council for consideration.

Provided the Inspector finds the plan to be 'sound', the final Site Allocations document is expected to be adopted by the Council in Spring 2016.

- **For the Local Allocations master plans…….**

All comments received on the draft master plans will be considered and reported to the Council's Cabinet, together with any recommended changes to their content. It is hoped that the master plans will be adopted by the Council at the same time as the final Site Allocations document (see above).

## Any Further questions?

If you have any further questions please contact the Strategic Planning and Regeneration team on 01442 228660 / 01442 228072 or email strategic.planning@dacorum.gov.uk.

**Thank you**

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# Appendix 4: Organisations and Individuals Contacted

## Distribution List – September 2014

| | Recipient | Document | Method of Notification |
|---|---|---|---|
| **DBC** | Councillors | - | Councillors Email |
| | Group Rooms | 2 | Doc |
| | Chief Executive - Sally Marshall | - | General Officers Email |
| | Asst Director Legal Governance (etc) – Steve Baker | - | General Officers Email |
| | Group Manager Legal Governance – Mark Brooks | - | General Officers Email |
| | Group Manager Regulatory Services – Chris Troy | - | General Officers Email |
| | Group Manager Commercial Assets (etc) – Mike Evans | - | General Officers Email |
| | Valuation & Estates – Adriana Livingstone | - | General Officers Email |
| | Asst Director Neighbourhood Delivery – David Austin | - | General Officers Email |
| | Group Manager Resident Services – Julie Still | - | General Officers Email |
| | Group Manager Environmental Services – Craig Thorpe | - | General Officers Email |
| | Trees and Woodlands - Colin Chambers | - | General Officers Email |
| | Asst Director Strategy & Transformation (etc) –Elissa Rospigliosi | - | General Officers Email |
| | Partnerships & Citizen Insight - Dave Gill | - | General Officers Email |
| | Communications - Sara Hamilton & Leida Smith | - | General Officers Email |
| | Communications – Claire McKnight: ex-Citizens Panel email | - | Email with Link to consultation |
| | Neighbourhood Action Team Leader – Joe Guiton | - | General Officers Email |
| | Director of Housing & Regeneration – Mark Gaynor | - | General Officers Email |
| | Assistant Director of Planning, Development & Regen – James Doe | - | General Officers Email |
| | Group Manager Strategic Housing – Julia Hedger | - | General Officers Email |
| | Housing Enabling – Camelia Smith | - | General Officers Email |
| | Group Manager Strategic Planning & Regeneration – Chris Taylor | - | General Officers Email |
| | Team Leader S P & R - Becky Oblein | - | General Officers Email |
| | Strategic Plans Team | 1 | |
| | Group Manager of Development Management – Alex Chrusiack | - | General Officers Email |
| | Development Management (inc. Enforcement & Land Charges) | - | General Officers Email |
| | Conservation & Design Team | - | General Officers Email |
| | HEMEL deposit point | 1 | Library Letter & Doc |
| | BERK deposit point | 1 | Library Letter & Doc |
| | TRING deposit point | 1 | Library Letter & Doc |
| | | | |

| | Recipient | Document | Method of Notification |
|---|---|---|---|
| | **SECTION TOTAL** | **6** | |
| | | | |
| **LIB** | County | 1 | Library Letter & Doc |
| | Hemel Hempstead | 1 | Library Letter & Doc |
| | Adeyfield | 1 | Library Letter & Doc |
| | Berkhamsted | 1 | Library Letter & Doc |
| | Bovingdon | 1 | Library Letter & Doc |
| | Kings Langley | 1 | Library Letter & Doc |
| | Tring | 1 | Library Letter & Doc |
| | Leverstock Green | 1 | Library Letter & Doc |
| | Herts Local Studies | 1 | Library Letter & Doc |
| | | | |
| | **SECTION TOTAL** | **9** | |
| | | | |
| **TPC** | Nash Mills | - | TPC Letter |
| | Flamstead | - | TPC Letter |
| | Great Gaddesden | - | TPC Letter |
| | Nettleden with Potten End | - | TPC Letter |
| | Kings Langley | - | TPC Letter |
| | Northchurch | - | TPC Letter |
| | Berkhamsted | - | TPC Letter |
| | Aldbury | - | TPC Letter |
| | Bovingdon | - | TPC Letter |
| | Chipperfield | - | TPC Letter |
| | Flaunden | - | TPC Letter |
| | Little Gaddesden | - | TPC Letter |
| | Tring Rural | - | TPC Letter |
| | Tring Town | - | TPC Letter |
| | Wigginton | - | TPC Letter |
| | Markyate | - | TPC Letter |
| | Leverstock Gr Village Assoc | - | TPC Letter |
| | | | |
| | **SECTION TOTAL** | **0** | |
| | | | |

| | Recipient | Document | Method of Notification |
|---|---|---|---|
| **STATUTORY CONSULTEES** | Secretary of State for Communities & Local Government | - | Letter/Email |
| | Planning Inspectorate | - | Letter/Email |
| | Adjoining Parish Councils | - | Letter/Email |
| | Adjoining Police Authorities | - | Letter/Email |
| | British Telecom | - | Letter/Email |
| | Transco | - | Letter/Email |
| | British Gas | - | Letter/Email |
| | Three Valleys Water | - | Letter/Email |
| | Luton Airport | - | Letter/Email |
| | Ministry of Defence | - | Letter/Email |
| | National Air Traffic Services | - | Letter/Email |
| | Herts Chamber of Commerce | - | Letter/Email |
| | | | |
| | **SECTION TOTAL** | **0** | |
| | | | |
| **KEY BODIES WITH WHICH DBC HAS A DUTY TO CO-OPERATE** | Aylesbury Vale District Council | - | Letter/Email |
| | Bedford Borough Council | - | Letter/Email |
| | Buckinghamshire County Council | - | Letter/Email |
| | Broxbourne Borough Council | - | Letter/Email |
| | Central Bedfordshire Council | - | Letter/Email |
| | Chiltern District Council | - | Letter/Email |
| | East Herts District Council | - | Letter/Email |
| | Hertsmere Borough Council | - | Letter/Email |
| | Hertfordshire County Council:<br>• Forward Planning – Jon Tiley<br>• Principal Planning Officer – Jacqueline Nixon<br>• Highways – Nick Gough<br>• Property Team – Matt Wood<br>• Hertfordshire Local Nature Partnership Co-Ordinator & Biodiversity Officer – Catherine Wyatt<br>• County Archaeologist – Kate Batt<br>• Natural History & Built Environment Advisory Team Leader – Rachel Donavan<br>• Gypsy Section – Charlie Sherfield<br>• Dick Bowler | - | Letter/Email |

| | Recipient | Document | Method of Notification |
|---|---|---|---|
| | Luton Council | - | Letter/Email |
| | Milton Keynes | - | Letter/Email |
| | North Hertfordshire District Council | - | Letter/Email |
| | St Albans City & District Council | - | Letter/Email |
| | Stevenage Borough Council | - | Letter/Email |
| | Three Rivers District Council | - | Letter/Email |
| | Watford Borough Council | - | Letter/Email |
| | Welwyn Hatfield District Council | - | Letter/Email |
| | Canal & River Trust | - | Letter/Email |
| | English Heritage | - | Letter/Email |
| | Environment Agency | - | Letter/Email |
| | Herts Constabulary | - | Letter/Email |
| | Herts Local Enterprise Partnership | - | Letter/Email |
| | Herts Valleys Clinical Commissioning Group | - | Letter/Email |
| | Highways Agency | - | Letter/Email |
| | Homes & Communities Agency | - | Letter/Email |
| | Mobile Operators Association c/o Mono Consultants | - | Letter/Email |
| | National Grid | - | Letter/Email |
| | National Health Service Executive (NHSE) | - | Letter/Email |
| | Natural England | - | Letter/Email |
| | Network Rail | - | Letter/Email |
| | Sport England | - | Letter/Email |
| | Strategic Health Authority (East of England) | - | Letter/Email |
| | Thames Water (via Savills) | - | Letter/Email |
| | UK Power Networks | - | Letter/Email |
| | | | |
| | **SECTION TOTAL** | **0** | |
| | | | |

| | Recipient | Document | Method of Notification |
|---|---|---|---|
| **NON STATUTORY CONSULTEES** | LSP (Local Strategic Partnership) | - | Email or Letter no doc |
| | Agents Forum | - | Email or Letter no doc |
| | County Councillors | - | Email or Letter no doc |
| | Clubs & Societies | - | Email or Letter no doc |
| | Berkhamsted & Tring Chambers of Commerce | - | Email or Letter no doc |
| | Health & Safety Executive | - | Email or Letter no doc |
| | Economic Development | - | Email or Letter no doc |
| | Education | - | Email or Letter no doc |
| | Employers | - | Email or Letter no doc |
| | British Pipeline Agency | - | Email or Letter no doc |
| | Dacorum Environmental Forum | - | Email or Letter no doc |
| | Ethnic Minority Groups | - | Email or Letter no doc |
| | Media | - | Email or Letter no doc |
| | Infrastructure Providers | - | Email or Letter no doc |
| | Disability Groups | - | Email or Letter no doc |
| | Residents Associations | - | Email or Letter no doc |
| | Key Land Owners/Developers | - | Email or Letter no doc |
| | Estate Agents | - | Email or Letter no doc |
| | Local Pressure Groups | - | Email or Letter no doc |
| | National Pressure Groups | - | Email or Letter no doc |
| | Interested Residents | - | Email or Letter no doc |
| | Planning Development Consultants | - | Email or Letter no doc |
| | Public Bodies | - | Email or Letter no doc |
| | Surveyors and Architects | - | Email or Letter no doc |
| | Voluntary Organisations | - | Email or Letter no doc |
| | HBRC – Martin Hicks | - | Email or Letter no doc |
| | | | |
| | **SECTION TOTAL** | **0** | |
| | | | |

## County Councillors

Cllr Andrew Williams
Cllr Anthony McKay
Cllr Colette Wyatt-Lowe
Cllr Ian Reay
Cllr Nick Hollinghurst
Cllr Ron Tindall
Cllr Terry Douris
Cllr William Wyatt-Lowe

## Ethnic Minority Groups

Africans Together In Dacorum
Asian Masti
Caribbean Women's Equality & Diversity Forum
Club Italia
Dacorum Chinese Community Association
Dacorum Chinese School Association
Dacorum Indian Society
Dacorum Multicultural Association / MWA
Hemel Anti Racism Council
Jewish Interests
Muskann - Pakistani Women's Association
Muslim Welfare Association

## Disability Groups

Age Concern
Dacorum Dolphin Swimming Club
Dacorum Talking Newspaper
DISH
Hemel Hempstead Access Group
Hertfordshire Action on Disability
Mind in Dacorum
POHWER
The Puffins
Tring Access Committee

## Residents Associations

Adeyfield Neighbourhood Association
Apsley Community Association

Bellgate Area Residents Association
Bennetts End Neighbourhood Assn
Berkhamsted Citizens Association
Bourne End Village Association
Briery Underwood Residents Association
Chaulden Neighbourhood Association
Conservation Area Resident's Association (CARAB)
Dacorum Borough Council Leaseholder Group
Douglas Gardens Street/Block Voice
Gaddesden Row Village Voice
Gadebridge Community Association
Grovehill Community Centre
Grovehill West Residents Association
Hales Park Residents Association
Heather Hill Residents Association
Henry Wells Residents Association
Herons Elm Street/Block Voice
Highfield Community Centre
Hunters Oak Residents Association
Hyde Meadows Residents Association
Kings Langley Community Association
Kings Langley Good Neighbours Association
Leverstock Green Village Association
Leverstock Green Village Association
Long Marston Tenants Association
Longdean Park Residents Association
Manor Estate Residents' Association
Nash Residents Association
Northend Residents Association
Pelham Court Residents Association
R.B.R. Residents Association
Redgate Tenants Association
Residential Boatowners Association
Rice Close Street/Block Voice
Save Your Berkhamsted Residents Association
Shepherds Green Residents Association
Street Block Voice (Hilltop Corner, Berkhamsted)
Street Block Voice (Typleden Close)
Street Block Voice (Winchdells)
Tenant Participation Team
The Briars & Curtis Road Street/Block Voice
The Mount Residents Association
The Planets Residents Association
The Quads Residents Association

The Tudors Residents Association
Thumpers Residents Association
Tring Community Assn
Village Voice (Little Gaddesden)
Warners End Neighbourhood Association
Westfield Road Street/Block Voice

**Key Land Owners/Developers**

Aitchison Raffety
Akeman Property Company Ltd
AMEC
Barratt Homes
Barton Wilmore
Beechwood Homes Ltd
Bellway Homes - North London
Bidwells
Box Moor Trust
Brian Barber Associates
Brixton Properties Limited
CALA Group Limited
Calderwood Property Investment Ltd
Carter Jonas (on behalf of the Crown Estate)
Chiltern of Bovingdon Ltd
City & Provincial Properties Plc
Colliers CRE
Courtley Consultants Ltd
D W Kent & Associates
David Wilson Estates
DLA Town Planning Ltd
DLP Planning Ltd
DPDs Consultant Group
Drivers Jonas Deloitte
Estates and Property Services
Felden Park Farms Ltd
Gallagher Estates
George Crutcher Planning
Gerald Eve LLP
Gleeson Strategic Land
Gregory Gray Associates
Griffiths Environmental Planning
Harrow Estates
Henry H Bletsoe & Son LLP

Hives Planning
Horstonbridge Development Management
Housebuilders Federation
Iceni Projects Limited
JB Planning Associates
Jehovah's Witnesses
Jeremy Peter Associates
John Beyer & Associates
Levvel
Lone Star Land Ltd
Main Allen
Maze Planning Ltd
Nathaniel Lichfield & Partners Ltd
Nelson Bakewell
Oakland Vale Ltd
Parrott & Coales
PDMS Vesty Limited
Peacock & Smith
Pegasus Group
Persimmon Homes Midlands
Picton Smeathmans
PJSA Property & Planning Consultants
Planning Perspectives
Plato Estate Ltd
Rapleys
Renaissance Lifecare Plc
Rolfe Judd Ltd
Savills
Sellwood Planning
Shireconsulting
Sibley Germain LLP
Smiths Gore
Steve Morton Brickworks Ltd
Stimpsons
Symbio Energy
Taylor Wimpey
TDP Developments Ltd
Tetlow King Planning
The Planning Bureau Limited
Thomas Eggar LLP
Tibbalds Planning & Urban Design
Tribal MJP
Turley Associates
Twigden Homes Ltd.

Vincent & Gorbing
Whiteacre
Woolf Bond Planning
Zog Brownfield Ventures Ltd
Chris & Jude Ball
Marianne Barker
Douglas Brightman
Derek Bromley
Andrew Burch
R Clarke
Steve Cook
Nick Gee
Mark Glenister
C Jeffery
Patricia Kelly
Rod Latham
John Normanton
David Prothero
Peter Vallis
Paul Webb
Mr & Mrs West
Mark Wilden
Mr. G Dean & Mrs C. M. Walter

**Local Strategic Partnership**

Churches Together
Community Action Dacorum
Countryside Management Service
Dacorum Chinese Association
Hertfordshire Constabulary
Herts County Council
Hillier Hopkins LLP
Primary Care Trust

**Estate Agents**

Adrian Cole and Partners
Aitchison Raffety
Aitchisons
Ashridge Estates
Bidwells
Brasier Harris

Carter Jonas
Castles
Cesare Nash & Partners
Cole Flatt & Partners
Connells
Cornerstone
Cushman & Wakefield
DTZ
Fisher Wilson
Freeth Melhuish
Hemel Property
Kirkby & Diamond
Lambert Smith Hampton
Michael Anthony
Nathaniel Lichfield & Partners
Pendley Commercial
Pendley Estates
Poulter & Francis
Savills
Stimpsons
Strutt & Parker
Stupples & Co

**Local Pressure Groups**

Action Against Injustice Caused by Dacorum Borough Council
Berkhamsted & District Gypsy Support Group
Berkhamsted Residents Action Group (BRAG)
Bucks & West Herts Gypsy Advocacy
Built Environment Advisory & Management Service
Campaign for Real Ale
Campaign to Protect Rural England
Chilterns Conservation Board
CPRE Hertfordshire
Dacorum Architecture Forum
Dacorum CVS
Dacorum Environmental Forum
Dacorum Environmental Forum Waste Group
Dacorum Green Party
Drayton Beauchamp Parish Meeting
Friends of Tring Reservoirs
Groundwork Hertfordshire
Guinness Trust

Gypsy Council
Hemel Hempstead High Street Assn.
Hertfordshire Agricultural Society
Hertfordshire Gardens Trust
Hertfordshire Gardens Trust Conservation Team
Herts & Middlesex Badger Group
Herts & Middlesex Wildlife Trust
Herts Fed.of Women's Institutes
Herts Natural History Society
Hightown Praetorian & Churches HA
Kings Langley Local History & Museum Society
London Luton Airport Operations Ltd
Markyate Village Hall Committee
Ramblers Association
S & W Herts Wwf Group And Green Party
Save Your Berkhamsted Residents Association
St Albans Enterprise Agency
The Box Moor Trust
The Chiltern Society
The Inland Waterways Association
Transition Town Berkhamsted
Tring Environmental Forum
Tring Sports Forum
Wendover Arm Trust
Woodland Trust

# Appendix 5:  Sample Notification Letters

**Notification Letter to Key Stakeholders/Statutory Consultees**

Date: 22 September 2014
Your Ref:
Our Ref: Site Allocations 2014
Contact: Spatial Planning
E-mail: spatial.planning@dacorum.gov.uk
Directline: 01442 228072 or 01442 228660

Civic Centre
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1HH

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

Dear,

**CONSULTATION ON PRE SUBMISSION SITE ALLOCATIONS DOCUMENT FOR DACORUM (REGULATION 19)**

I am writing to let you know that the Council has published the pre-submission version of the Site Allocations Development Plan Document (DPD) for consultation. The consultation begins on Wednesday 24 September and ends at 5.15pm on Wednesday 5 November 2014.

**What is the consultation about?**
This consultation is on the pre-submission version of the Site Allocations in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012.

The Site Allocations follows on from and supports the Core Strategy, which was adopted in September 2013 and sets out the planning framework for Dacorum for the next 20 years. The Site Allocations DPD is the next part of the framework. Its principal role is to deliver the objectives of the Core Strategy, by forming detailed proposals and requirements for sites and areas. It allocates sites for future development; defines the boundaries of planning designations; and ensures appropriate infrastructure is identified and delivered alongside new development. This includes consultation on the master plans for Green Belt housing sites known as Local Allocations.

The document is made up of a written statement and a map book. The Map Book shows amendments and additional changes required to the existing Policies Map that accompanies the Dacorum Borough Local Plan.

The Pre-Submission Site Allocations document is accompanied by a Sustainability Appraisal Report and the Report of Consultation.

**How do I find out more?**
Copies of the Site Allocations, Local Allocation master plans, and associated documents can be purchased from the Borough Council's offices during normal opening hours, or downloaded free of charge from www.dacorum.gov.uk/planning. Reference copies are also held at all libraries within the Borough.

Your attention is particularly drawn to the list of public exhibitions that have been arranged for mid-October, where you can come and find out more information.

| Date | Town / Village | Venue | Time |
|---|---|---|---|
| Monday 13th October | Hemel Hempstead | Civic Centre, Marlowes | 2-8pm |
| Monday 13th October | Bovingdon | Bovingdon Football Club, Green Lane | 2-8pm |
| Tuesday 14th October | Tring | Temperance Hall, Christchurch Road | 2-8pm |
| Wednesday 15th October | Berkhamsted | Main Hall, Civic Centre, High Street | 2-8pm |
| Friday 17th October | Hemel Hempstead | Warners End Community Centre, Northridge Way | 2-8pm |

**How do I comment?**
We would encourage you to submit your comments via the Council's online consultation portal at http://consult.dacorum.gov.uk. Paper copies of the Site Allocations response form and the Local Allocations questionnaires are available on request and at the drop in sessions listed above.

Comments must be received by 5.15pm on 5th November in order for them to be taken into account.

**What happens next?**
The Council will consider the results of this consultation before progressing to the next stage which would be the submission of the document to the Planning Inspectorate for Examination in Public. Responses to the master plans will be reviewed internally by the Council and it is anticipated these plans will be formally adopted at the same time as the Site Allocations DPD.

If you have any questions please contact the Strategic Planning team on 01442 228072 or 01442 228660 or email strategic.planning@dacorum.gov.uk

Yours sincerely,

**Laura Wood**
**Team Leader – Strategic Planning and Regeneration**

Date: 22 September 2014
Your Ref:
Our Ref: Site Allocations 2014
Contact: Spatial Planning
E-mail: spatial.planning@dacorum.gov.uk
Directline: 01442 228072 or 01442 228660

Civic Centre
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1HH

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

Dear,

**CONSULTATION ON PRE SUBMISSION SITE ALLOCATIONS DOCUMENT FOR DACORUM (REGULATION 19)**

I am writing to let you know that the Council has published the pre-submission version of the Site Allocations Development Plan Document (DPD) for consultation. The consultation begins on Wednesday 24 September and ends at 5.15pm on Wednesday 5 November 2014.

**What is the consultation about?**
This consultation is on the pre-submission version of the Site Allocations in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012. Please find enclosed a copy of the statement of the representation procedure.

The Site Allocations follows on from and supports the Core Strategy, which was adopted in September 2013 and sets out the planning framework for Dacorum for the next 20 years. The Site Allocations DPD is the next part of the framework. Its principal role is to deliver the objectives of the Core Strategy, by forming detailed proposals and requirements for sites and areas. It allocates sites for future development; defines the boundaries of planning designations; and ensures appropriate infrastructure is identified and delivered alongside new development. This includes consultation on the master plans for Green Belt housing sites known as Local Allocations.

The document is made up of a written statement and a map book. The Map Book shows amendments and additional changes required to the existing Policies Map that accompanies the Dacorum Borough Local Plan.

The Pre-Submission Site Allocations document is accompanied by a Sustainability Appraisal Report and the Report of Consultation Volume.

**How do I find out more?**
Copies of the Site Allocations, Local Allocation master plans, and associated documents can be purchased from the Borough Council's offices during normal opening hours, or downloaded free of charge from www.dacorum.gov.uk/planning. Reference copies are also held at all libraries within the Borough.

Your attention is particularly drawn to the list of public exhibitions that have been arranged for mid-October, where you can come and find out more information.

| Date | Town / Village | Venue | Time |
|---|---|---|---|
| Monday 13th October | Hemel Hempstead | Civic Centre, Marlowes | 2-8pm |
| Monday 13th October | Bovingdon | Bovingdon Football Club, Green Lane | 2-8pm |
| Tuesday 14th October | Tring | Temperance Hall, Christchurch Road | 2-8pm |
| Wednesday 15th October | Berkhamsted | Main Hall, Civic Centre, High Street | 2-8pm |
| Friday 17th October | Hemel Hempstead | Warners End Community Centre, Northridge Way | 2-8pm |

**How do I comment?**
We would encourage you to submit your comments via the Council's online consultation portal at http://consult.dacorum.gov.uk. I have enclosed a sheet that gives a step-by-step guide on how to do this. Paper copies of the Site Allocations response form and the Local Allocations questionnaires are available on request.

Comments must be received by 5.15pm on 5th November in order for them to be taken into account.

**What happens next?**
The Council will consider the results of this consultation before progressing to the next stage which would be the submission of the document to the Planning Inspectorate for Examination in Public. Responses to the master plans will be reviewed internally by the Council and it is anticipated these plans will be formally adopted at the same time as the Site Allocations DPD.

If you have any questions please contact the Strategic Planning team on 01442 228072 or 01442 228660 or email strategic.planning@dacorum.gov.uk

Yours sincerely

**Laura Wood**
**Team Leader – Strategic Planning and Regeneration**

# Appendix 6:  Cabinet Report and Full Council Decision

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| **Report for:** | **Cabinet** |
| **Date of meeting:** | **24 June 2014** |
| **PART:** | **1** |
| If Part II, reason: | |

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| **Title of report:** | **Dacorum Local Planning Framework: Pre-Submission Site Allocations** |
| Contact: | Andrew Williams, Leader of the Council and Portfolio Holder for Planning and Regeneration<br><br>James Doe, Assistant Director – Planning, Development and Regeneration<br><br>Laura Wood, Team Leader – Strategic Planning and Regeneration (Strategic Planning)<br><br>Sarah Churchard - Strategic Planning and Regeneration Officer |
| Purpose of report: | To seek agreement of the Pre-Submission Site Allocations document and arrangements for consultation and submission. |
| Recommendations | That Cabinet:<br><br>6. Note key issues arising from Issues and Options Consultation, the Core Strategy and new information and advice.<br>7. Recommend the Site Allocations Pre-Submission documents to Council for publication and comment.<br>8. Recommends Council delegate authority to the Assistant Director (Planning Development and Regeneration) in consultation with the Planning and Regeneration Portfolio Holder to finalise the Report of Consultation and Sustainability Appraisal, to make any factual or non-substantive changes and amendments to the Pre-Submission Site Allocations and to insert the Indicative Spatial Layout plan into Policy LA3 West Hemel Hempstead prior to consultation commencing.<br>9. To recommend Council to approve the Site Allocations |

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| | for publication, seeking representations in accordance with the Statement of Community Involvement and relevant regulations.<br>10. To recommend Council to approve the following procedure for considering future issues on the Site Allocations:<br>(c) If significant new issues are raised in the representations on the forthcoming consultation, to report to Cabinet and Council for a decision as to whether any change to the Site Allocations is justified;<br>(d) If there are no significant new issues, to delegate authority to the Assistant Director (Planning, Development and Regeneration) to:<br>(iii) Submit the Site Allocations for Examination; and<br>(iv) In consultation with the Planning and Regeneration Portfolio Holder, to agree any minor changes to the Site Allocations to resolve objections and improve clarity of the document. |
| Corporate objectives: | The Site Allocations forms part of the Council's Local Planning Framework, which as a whole helps support all 5 corporate objectives:<br>• *Safe and clean environment:* e.g. contains policies relating to the design and layout of new development that promote security and safe access.<br>• *Community Capacity:* e.g. provide a framework for local communities to prepare area-specific guidance such as Neighbourhood Plans, Town / Village Plans etc.<br>• *Affordable housing:* e.g. sets the Borough's overall housing target and the proportion of new homes that must be affordable.<br>• *Dacorum delivers:* e.g. provides a clear framework upon which planning decisions can be made.<br>• *Regeneration:* e.g. sets the planning framework for key regeneration projects, such as Hemel Hempstead town centre and the Maylands Business Park. |
| Financial/ Value for Money Implications: | The process of preparing the Site Allocations as part of the Local Planning Framework (LPF) has financial implications. The Council has created a 'Local Planning Framework' earmarked reserve to support expenditure. Money is drawn down from this reserve to provide an annual budget to support LPF-related work.<br><br>Having an up-to-date planning policy framework helps reduce the incidence of planning appeals (and thus costs associated with those). It will also be the most effective way of ensuring the optimum level of developer contributions to infrastructure and in mitigation of development impacts can be achieved.<br><br>Like the Core Strategy, the Site Allocations document, once adopted, can be subject to legal challenge and costs |

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| | associated with this process. |
| Risk Implications | A full risk assessment has been carried out as part of the PID for the Local Planning Framework. These risks are reviewed monthly through CORVU and reported each year through the Annual Monitoring Report (AMR). Identified risks include failure of external agencies or consultants to deliver on time, change in Government policy and team capacity. If the Council were to decide not to progress the Site Allocations DPD, significant additional risks would arise. These would relate to a lack of an up-to-date framework upon which to base planning decisions within the Borough, and the likelihood of a significant increase in speculative planning applications (and potentially appeals), particularly for housing development in the Green Belt, which would prove hard to defend. There would also be financial implications i.e. extra costs associated with planning appeals and inquiries. |
| Equalities Implications | Equality Impact Assessment carried out for the Core Strategy which sets the framework for the Site Allocations DPD. The Sustainability Report for the Core Strategy concludes that the plan avoids any discrimination on the basis of disability, gender or ethnic minority. The Site Allocations builds on the requirements of the Core Strategy with regard to issues such as affordable housing and homes for minority groups, accessibility of facilities and local employment. The Sustainability Appraisal Report which accompanies the Site Allocations found no specific issues with regards to disability, gender or ethnic minority. |
| Health and Safety Implications | They are included in the planning issues covered by the Site Allocations. For example, where appropriate references are made to appropriate site access points and to the need to consult the Health and Safety Executive where sites are potentially affected by the nearby storage of hazardous substances. |
| Monitoring Officer/S.151 Officer Comments | Deputy Monitoring Officer:<br><br>No comments to add to the report.<br><br>Deputy S.151 Officer:<br><br>No further comments to add to this report. |
| Consultees: | Consultation on the Site Allocations DPD has been carried out in accordance with the Statement of Community Involvement (SCI), adopted by the Council in June 2006. |

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| | The nature and scope of this consultation is set out within the Reports of Consultation that followed the 2006 and 2008 Issues and Options Consultations.<br><br>Advice from key stakeholders, such as the Local Education Authority and Highway Authority, has been sought where appropriate. Feedback on the Council's Infrastructure Delivery Plan has also been significant in developing a clear understanding of local infrastructure needs. This advice is referred to within the relevant Background Issues paper that form part of the Site Allocations DPD evidence base.<br><br>The Consultation Reports relating to the Core Strategy (Volumes 1-7) are also relevant.<br><br>In terms of internal processes, a Task and Finish Group have advised on the preparation of the Site Allocations DPD. There have been reports to Cabinet at key stages in the preparation of the Local Planning Framework and the Planning and Regeneration Portfolio Holder has been kept appraised of progress. |
| Abbreviations: | DPD Development Plan Document<br>SCI Statement of Community Involvement<br>LDS Local Development Scheme<br>NPPF National Planning Policy Framework<br>NPPG National Planning Practice Guidance<br>InDP Infrastructure Delivery Plan<br>SPD Supplementary Planning Document<br>SPG Supplementary Planning Guidance<br>LPF Local Planning Framework<br>CIL Community Infrastructure Levy<br>GEA General Employment Area |
| Background Papers: | • Statement of Community Involvement (June 2006)<br>• Local Development Scheme (February 2014)<br>• Dacorum Borough Local Plan 1991-2011 (adopted April 2014)<br>• National Planning Policy Framework (March 2012)<br>• National Planning Practice Guidance (March 2014)<br>• Town and Country Planning (Local Planning) (England) Regulations 2012<br>• Core Strategy (adopted September 2013)<br>• Report of Consultation – Site Allocations Issues and Options (2006)<br>• Report of Consultation – Site Allocations Supplementary Issues and Options (2008)<br>• Consultation Reports relating to the Core Strategy (Volumes 1-7) (as dated)<br>• Schedule of Site Appraisals (2006, 2008 and 2014) |

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| | • Sustainability Working Notes for Schedules of Site Appraisals (2006, 2008 and 2014)<br>• Workshop Reports for Local Allocations LA1, LA3 and LA5 (July 2013).<br>• Notes from Stakeholder meetings for Local Allocations LA2, LA4 and LA6 (May 2013).<br>• Report on the Consultation event held in July 2013: 'Shaping the Masterplan' for Proposal Local Allocation LA3: West Hemel Hempstead (January 2014)<br>• Draft Background Issues Papers (June 2014) on:<br>– The Sustainable Development Strategy<br>– Strengthening Economic Prosperity<br>– Providing Homes and Community Services<br>– Looking After the Environment<br><br>All technical studies relating to the Local Planning Framework are available from the online Core Strategy examination library at www.dacorum.gov.uk/corestrategyexamination. |

**BACKGROUND:**

## 1. Introduction to the Site Allocations

1.1 In September 2013 the Council adopted its Core Strategy. This was the first document that makes up the Council's new Local Planning Framework (LPF) or Local Plan. The purpose of the Core Strategy is to set the strategic planning policies for the Borough up to 2031.

1.2 The Site Allocations DPD is the next part of the LPF. Its principal role is to deliver the objectives of the Core Strategy, by establishing detailed proposals and requirements for particular sites and areas. It:

- allocates sites for future development in the Borough;
- defines the boundaries of planning designations; and
- ensures appropriate infrastructure is identified and delivered alongside new development.

1.3 Designations and allocations are illustrated on a Policies Map (previously referred to as a 'Proposals Map').

1.4 The Site Allocations DPD comprises a written statement and a map book. The latter shows amendments and additions required to the existing Policies Map.

1.5 The Site Allocations DPD excludes consideration of allocations and land designations within the area covered by the East Hemel Hempstead Area Action Plan. This area largely equates to the Maylands Business Park. However, where the AAP contains important sites, these are cross referred to within the Site Allocations DPD supporting text to ensure a comprehensive picture of sites and designations is provided for the Borough.

1.6 A summary of the coverage of the Site Allocations DPD is set out in Appendix 1.

1.7 Once adopted, the planning policies and associated designations within the Site Allocations DPD will be used to determine planning applications, together with policies in the Core Strategy and relevant development management policies. Development management policies are currently provided through 'saved' policies of the Dacorum Borough Local Plan 1991-2011, which will be superseded over time by the Development Management DPD or through the early partial review process.

1.8 The Site Allocations DPD contains a list of those polices from the 'saved' Dacorum Borough Local Plan 1991-2011 that are now superseded. This list is an update to that contained within Appendix 1 of the Core Strategy.

1.9 As stated above, the Site Allocations DPD allocates sites and takes forward designations in support of the Core Strategy. The Core Strategy was found 'sound' by a Planning Inspector on the basis that the Council signs up to an early partial review of the plan. This will look again at the Council's overall housing target and associated

policy issues. If this early partial review process identifies a higher housing requirement than the current Core Strategy, the Site Allocations DPD will also need to be reviewed. This will be achieved through the early partial review being incorporated within a new single Local Plan.

## 2. Where we are in the process

2.1 Appendix 2 sets out key stages in the preparation of the Site Allocations DPD. Whilst initial work on the Site Allocations DPD was progressed in parallel with the consultation on the Core Strategy (with Issues and Options consultation in 2006 and supplementary issues and options consultation in 2008), work on preparing the Site Allocations document was slowed due to the need to prioritise taking the Core Strategy through to examination and adoption. The Core Strategy sets the strategic context for the Site Allocations and the two documents largely share the same evidence base.

2.2 The Council is about to reach a key stage in the Site Allocations process, known as Pre-Submission (or 'Publication'). This is where the Council publishes the version of the Site Allocations document that it proposes to submit to the Planning Inspectorate and take forward to Examination (see Figure 2 below).

2.3 The recently published National Planning Practice Guidance (NPPG) makes it clear that Council's no longer need to consult on an interim Preferred Options Plan or Draft Plan, but can proceed direct from Issues and Options to Pre-Submission stage in order to expedite the plan-making process.

2.4 The Pre-Submission Site Allocations DPD must be accompanied by a Sustainability Appraisal Report and Consultation Statement. Both of these documents have been prepared on an iterative basis and show how the Site Allocations DPD has developed from a consideration of issues and site options, to the Pre-Submission version. The Pre-Submission Site Allocations document, the Sustainability Appraisal Report and the Consultation Report are jointly referred to as the 'Proposed Submission documents.'

2.5 Once endorsed by Full Council, the Pre-Submission Site Allocations DPD becomes a material planning consideration for relevant planning decisions and will be published for formal comment for a 6 week period (as required by planning regulations).

2.6 If the Council wishes to make any significant changes to the Pre-Submission version in the light of representations made during this 6 week period, it will either need to repeat the Pre-Submission version or consult further on proposed modifications, before it submits the document to the Planning Inspectorate. This additional stage would have an impact on the timetable for the Local Planning Framework set out in the recently adopted Local Development Scheme (February 2014), as well as resource implications. This timetable is attached as Appendix 3.

## 3. Implications of Core Strategy Legal Challenge

3.1 The outcome of the legal challenge to the Core Strategy, brought by Grand Union Investments Ltd, is still not known. Whilst the outcome of this challenge may have significant implications for the Site Allocations DPD it is important to proceed with the document for a number of reasons:

- It will demonstrate the availability of a robust and deliverable 5 and 15 year land supply, as required by the National Planning Policy Framework (NPPF);
- It helps establish planning requirements for key housing sites (particularly the Local Allocations), and provides a basis on which to seek public feedback on these;
- It supports delivery of the Hemel Hempstead Town Centre Master plan by formally designating key sites for development and redevelopment; and
- Work on the Site Allocations will help inform production of a new single Local Plan, as part of the early partial review of the Core Strategy.

3.2 A verbal update on the legal challenge position will be given at the meeting, if available.

## 4. Role of Consultation and technical evidence and advice

4.1 The starting point for the Site Allocations DPD has been the strategic policy position set out in the Core Strategy. Sites and designations shown on the existing Policies Map (based on the Dacorum Borough Local Plan 1991-2011) have been reviewed and where necessary updated.

4.2 A series of Background Issues Papers (June 2014) have been prepared to support the Site Allocations DPD. These papers form part of the evidence base. Their role is to inform the content of the Site Allocations DPD through:

(a) summarising background policy, guidance and advice relevant to each subject area; and
(b) assessing which sites, designations and/or boundary changes it is appropriate to take forward in the context of this advice and set out any additional selection criteria used.

4.3 Information has been collected from a number of different sources and as the assessment has been an iterative process, incorporating the conclusions of sustainability appraisal and advice from technical experts as appropriate. These sources include:

- Feedback from public issues and options consultation (2006 and 2008)
- Information in the Schedule of Site Appraisals (2006, 2008 and 2014)
- Outcome of independents sustainability assessment of sites submitted for consideration
- Feedback from consultation and Examination of the Core Strategy
- Monitoring information and known changes on the ground
- Site visits by Officers
- Technical studies
- Map-based research

- Advice form technical experts
- Government advice and good practice.

## 5. Key Issues for the Site Allocations document

Green Belt changes

5.1 The Site Allocations DPD does not seek to look again at the Council's housing target or Green Belt boundaries (apart for the correction of minor anomalies and the release of land associated with the Local Allocations). These issues will be considered further through the early partial review of the Core Strategy which is scheduled for adoption in autumn 2017 (see Appendix 3). The proposed changes to the Green Belt and Rural Area and any necessary revisions to settlement and village boundaries are explained further in the Sustainable Development Strategy Background Issues Paper (June 2014).

Housing:

5.2 One of the key roles of the Site Allocations document is to demonstrate how the Council will deliver the housing target set out in the Core Strategy. However, not all future housing land needs to be explicitly identified through a housing allocation and listed in the housing schedule within the document. Sites also come from a variety of other sources including:

- Completions (i.e. dwellings already completed within the plan period - 2006-2013)
- Commitments (i.e. schemes with planning permission which have yet to be constructed)
- Sites identified within the Strategic Housing Land Availability Assessment (SHLAA)
- Rural exceptions sites (under Policy CS20: Rural Sites for Affordable Homes)
- Gypsy and Traveller pitches (17 pitches as specified in the Core Strategy); and
- An assumed continuation of small 'windfall sites (excluding back garden land)

5.3 All potential development sites have been assessed against a detailed and wide ranging list of criteria, which were based on the principles of sustainable development and compliance with the strategic policies set by the Core Strategy. Where appropriate, the site assessment process involved site visits and desk based research. All site options have also been subject to separate, independent sustainability appraisal. Not all of the sites identified or put forward were selected for inclusion within the housing schedule: rather the Site Allocations document focusses on sites that will make a significant contribution to delivering the objectives of the Core Strategy.

5.4 For practical reasons, and taking account of the size of Dacorum and the considerable number of sites that have been advanced for possible development, a size threshold has been adopted for allocations of 0.3 hectares or greater (or capable of accommodating 10 dwellings or more). Developments below this threshold can still be considered on their merits, through the planning application process, and will contribute to overall housing delivery.

5.5 The housing programme set out in the Pre-Submission Site Allocations document demonstrates that (a) the Core Strategy target can be met and modestly exceeded and (b) there is a clear and deliverable 5 year housing land supply. If full account is taken of all potential future sources of housing land (e.g. small windfalls on garden land and larger windfall potential) this provides for an additional margin to allow some additional flexibility, as required by the NPPG.

5.6 The Local Allocations identified within the Core Strategy remain the only housing sites identified for release from the Green Belt.

5.7 Further information regarding housing land availability and the site selection process is contained within the Providing Homes and Community Needs Background Issues Paper (June 2014).

5.8 The housing programme contained within the Pre-Submission Site Allocations document is based on the most up-to-date housing monitoring information currently available. This has a base date of April 2013. It is recommended that the programme is updated (as a matter of fact) to reflect the latest (April 2014) position when these figures are released by the County Council. This information will be available in time to include within the document before it is published for formal comment in September (see consultation arrangements below). This will ensure that the Pre-Submission Site Allocations document contains the most up-to-date information on housing available. The Meeting Homes and Community Needs Background Issues Paper will also need to be updated to incorporate and explain these updated figures.

5.9 The same principle applies to updating the employment monitoring data to a base date of April 2014.

Local Allocations

5.10 The Core Strategy has identified urban extensions to some of the larger settlements referred to as Local Allocations. Developing these sites requires their release from the Green Belt. This principle was established through the Core Strategy. They will contribute over 1,595 homes over the plan period. This total capacity has increased slightly from the original indicative figure in the Core Strategy (1,550) due to the conclusion of subsequent technical work to inform the site masterplans (see below).

5.11 The role of the Site Allocations document is to define:

(a) precise site boundaries;
(b) the area to be released from the Green Belt (where this differs from the site boundary);
(c) detailed requirements in the form of development principles that will guide their development; and
(d) requirements with regard to delivery and phasing.

5.12 Policies LA1-LA6 of the Site Allocations document set out in more detail how the Local Allocations will be brought forward, with associated changes to the Policies Map shown in the accompanying map book.

5.13 The indicative spatial layout for LA3: land West of Hemel Hempstead is still being drawn up by the urban design consultants preparing the masterplan on behalf of the developers of the site. It is requested that the indicative spatial layout plan be agreed for inclusion within Policy LA3 of the Site Allocations document through delegated authority to the Assistant Director – Planning, Development and Regeneration, in consultation with the Portfolio Holder for Planning and Regeneration (as per recommendation 3 of this report). Such agreement would follow consideration of the indicative spatial layout for this site (and all other Local Allocations) by Cabinet as part of the report of the Local Allocations draft masterplans being considered at the July meeting.

5.14 The approach has been informed by a series of workshops and meetings held in May 2013, and, in the case of LA3: West Hemel Hempstead, by wider public consultation on 'Shaping the Masterplan' carried out in summer 2013. Where required, further technical advice has also been sought from appropriate experts e.g. regarding schools, highways, archaeology and sustainable drainage. Regular meetings have also been held with the landowners / developers to discuss issues pertaining to their sites.

5.15 Core Strategy Policy CS3: Managing Selected Development Sites controls the timing of delivery, stating that the Local Allocations will be delivered from 2021. This approach is principally to ensure a steady release of housing land over the plan period, to encourage earlier opportunities for homes on previously developed land within the settlements, to boost supply over the latter half of the housing programme (where identified urban sites decline), and to maintain housing activity for the development industry and wider local economy. In the short to medium term, housing supply in the Borough is strong, without their contribution.

5.16 Following further consideration of local housing needs and the role the site will play in delivering other essential local infrastructure, the delivery of Local Allocation LA5: Icknield Way, west of Tring has been brought forward into Part 1 of the Schedule of Housing Proposals and Sites. Whilst no specific delivery date has been set, this will follow the formal release of the site from the Green Belt i.e. after adoption of the Site Allocations DPD. Further explanation for this earlier release date is set out within the Providing Homes and Community Services Background Issues Paper (June 2014).

5.17 The reasons for the earlier release of Local Allocation LA5 are set out in the Meeting Homes and Community Needs Background Issues Paper (June 2014). They include:

- the role the site will play in ensuring a robust 5 year housing land supply (for both bricks and mortar homes and Gypsy and Traveller pitches);
- the benefits of the early delivery of the extension to the Icknield Way GEA;
- the benefits of securing land for an extension to Tring cemetery and associated public open space; and

- the lack of any infrastructure capacity issues that require site delivery to be delayed until later in the plan period.

5.18 The remaining Local Allocations (i.e. LA1-LA4 and LA6) are included in Part 2 of the Schedule of Housing Proposals and Sites and will bring forward completed homes from 2021 onwards. No detailed phasing of individual sites is warranted as they vary significantly in size, character, and location, and these factors will naturally regulate their release over time. However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that applications will be received and determined in advance of 2021 and that site construction and works may actually take place ahead of the specified release date to enable occupation of new homes by 2021.

5.19 Masterplans are currently being drawn up for each Local Allocation, in conjunction with the landowners and/or developers of the sites. These masterplans do not form part of the formal Site Allocations document, but will take forward the development principles and provide further detailed information and guidance regarding how the sites should be developed. They will be a material planning consideration for future planning applications. Draft versions of the masterplans will be considered by Cabinet in July, with a view to public consultation on these running in parallel with that on the Site Allocations document.

5.20 For both the Site Allocations document and the associated masterplans, the forthcoming consultation is an opportunity for members of the public and organisations to comment on the detailed proposals for the Local Allocations, not the principle of their designation.

## 6. Duty to Co-Operate

6.1 The 'duty to cooperate' was introduced by the Localism Act 2011. It places a legal duty on local planning authorities, county councils and public bodies to engage constructively, actively and on an ongoing basis with regard to 'strategic cross-boundary matters' when preparing document such as the Site Allocations. Whilst the duty to cooperate is not a duty to agree, local planning authorities are expected to make every effort to secure the necessary cooperation on relevant matters before they submit their plans for examination.
Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their plans. If a local planning authority cannot demonstrate that it has complied with the duty then the plan will not be able to proceed further in examination.

6.2 It is primarily the role of the Core Strategy, rather than the Site Allocations, to address strategic cross-boundary matters. A 'duty to co-operate statement' was prepared as part of the evidence submitted to the Core Strategy Examination and the Planning Inspector who oversaw this examination was satisfied that the duty had been met. It is recommended that a short factual update to the Core Strategy duty to co-operate statement is prepared to support submission of the Site Allocations DPD. Whilst it is not considered that there are any strategic cross-boundary issues that it is appropriate

for the Site Allocations document to address, all statutory consultation bodies and relevant district and county councils have been contacted by letter / email to ask if there are any outstanding matters they would like to raise.

6.3 To date, three replies have been received. Bedford Borough Council has confirmed they have no comment at this stage. North Herts District Council has confirmed that the document doesn't raise any concerns regarding their district's needs. Chiltern District Council has requested a meeting with Officers to discuss the potential for Dacorum to help meet some of their housing and Gypsy and Traveller needs. The outcome of this meeting, and any further duty to co-operate issues raised, will be reported verbally at the meeting.

## 7. Next Steps

Agreement of Proposed Submission Documents

7.1 The Pre-Submission Site Allocations document has been assessed by the Council's independent sustainability consultants (C4S). They have suggested a few very minor changes to the document, largely to improve clarity, rather than as a result of any sustainability concerns. These changes have been incorporated into the document. The final version of the Sustainability Appraisal Report (June 2014) will be updated following Cabinet and be available in its final form for consideration by Full Council.

7.2 In order to enable limited changes to be made to the Pre-Submission Site Allocations document prior to consultation commencing, and to allow for supporting documents to be completed, it is requested that Cabinet delegate authority to the Assistant Director (Planning Development and Regeneration), in consultation with the Planning and Regeneration Portfolio Holder, to finalise the Report of Consultation and Sustainability Appraisal and to make any factual and/or non-substantive changes and amendments to the Pre-Submission Site Allocations prior to consultation commencing.

Consultation arrangements:

7.3 The 2012 Planning Regulations require a 6 week representation stage for Pre-Submission versions of Development Plan Documents (DPDs) such as the Site Allocations document. It is intended to begin this consultation in early September, to avoid the peak summer holiday period.

7.4 As a minimum, consultation must follow the requirements set out within the Council's Statement of Community Involvement (SCI). This includes:

- press release
- formal notice in local paper(s)
- Reference copies of documents available at deposit points and local libraries
- Information available on the Council's website,

- Letters / emails to all statutory consultation bodies, adjoining local planning authorities, town and parish councils and individuals and organisations on the Council's Local Plan database.
- Articles in Dacorum Digest (if publication dates allow).

7.5 For the Pre-Submission stage of the Core Strategy, it was not considered appropriate to hold any public consultation events, such as drop-in sessions or manned exhibitions. This was due to the fact that (a) such events are not a requirement of the SCI for the Pre-Submission stage and (b) such events had been held at an interim, 'Draft Plan' stage.

7.6 As the Site Allocations DPD has progressed directly from issues and options consultation to Pre-Submission, there has been no previous opportunity for residents and interested parties to talk to Officers and Members about the Site Allocation documents in person. There is also expected to be considerable interest in the Local Allocations masterplans. It is therefore recommended that the consultation programme includes a number of manned exhibitions. Details will be agreed with the Portfolio Holder, but as a minimum it is suggested they will include an afternoon and evening session at:

- Hemel Hempstead Civic Centre
- Berkhamsted Civic Centre
- Victoria Hall, Tring
- Memorial Hall, Bovingdon
- A community centre near the West Hemel Hempstead (LA3) site i.e. Warners End or Chaulden.

Venues, dates and times will be dependent upon room availability.

7.7 Due to the very limited implications of the Site Allocations DPD for Markyate and Kings Langley, and the lack of a Local Allocation in these areas, manned exhibitions are not considered necessary. Arrangements will however be made to ensure residents have access to consultation material and can contact Officers if any questions do arise.

7.8 Prior to consultation commencing, it is also suggested that Officers invite representatives from organisations who have a particular interest in the content of the Site Allocations to meet to discuss the document and how they can best respond.

<u>Agreements for Submission:</u>

7.9 In addition to agreeing arrangements for representations to be received on the Pre-Submission Site Allocations, it is recommended that Cabinet also agrees the next stages in the process, to allow us to proceed effectively towards Examination. The first step is to draw up a Report of Representations. This will summarise the comments raised with regard to the Pre-Submission Site Allocations. If significant new objections are raised, these will be reported to Cabinet and Full Council. If no significant new issues are raised, Cabinet and Full Council are asked to delegate authority to the Assistant Director (Planning, Development and Regeneration) to

submit the Site Allocations DPD for examination and, in consultation with the Planning and Regeneration Portfolio Holder, agree minor changes to the document to resolve objections and improve clarity. It is normal to allow this degree of flexibility to enable the smooth running of the examination process and for the Local Development Scheme (LDS) timetable to be met.

7.10 The timetable within the LDS (see Appendix 3) assumes that Submission will take place in July 2015, with Examination following in October 2015. Following receipt of the Inspector's Report, Cabinet and Full Council will consider its findings. It is hoped that the final Site Allocations DPD can be adopted by the Council in early 2016.

7.11 As the masterplans for the Local Allocations are not part of the Site Allocations DPD itself, they are not governed by the same planning regulations and do not need to be submitted for independent Examination. All comments received on the masterplans will be considered and reported to Cabinet, together with any recommended changes to their content. It is hoped that the masterplans will be adopted by the Council at the same time as the final Site Allocations DPD.

**Appendix 1**

## Site Allocations DPD - Summary of Content

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The structure and content of the Site Allocations broadly reflects that of the Core Strategy. Strategic Objectives from the Core Strategy are repeated at the beginning of each section. The content of the Core Strategy is not repeated, although necessary cross-references are made. Coverage of each section is outlined below:

**The Sustainable Development Strategy** – This section sets out the extent of key boundaries relating to the Green Belt, Rural Area, major developed sites in the Green Belt and individual towns and villages. These boundaries are important as they affect the approach to development that will be taken in different locations. In recognition of the increased role of 'mixed use' schemes within the Borough, a number of mixed use development sites are also identified. These will deliver a range of complementary uses as part of their development or redevelopment. Sites are also identified and protected for transport uses.

**Providing Home and Community Uses** – One of the main functions of the Site Allocations is to identify how specific sites will contribute towards delivery of the housing target, which is set out in the Core Strategy. Key housing sites are identified, detailed requirements set for the Local Allocations, and specific provision is also made for travelling communities. In order to ensure appropriate supporting infrastructure is provided to support residents and workers, a number of sites are specifically identified and protected for community and leisure uses and open land.

**Promoting Economic Prosperity** – A review of employment allocations and designations within the Borough has been carried out. This review has sought to ensure that sufficient good quality employment land is available to meet the Core Strategy's employment targets (for offices and industrial, storage and distribution floorspace). The scope to reallocate some employment land for housing development has also been considered. This work has also sought to ensure the uses permitted in designated employment areas remains appropriate in terms of their character and current market demands and supports growth in local economic prosperity. Following changes in national policy on retail matters, the opportunity has been taken to update the Council's approach to the main retail centres, and in particular to redefine the role and extent of protected shopping frontages within the Borough's three town centres. The approach to the Borough's more numerous local centres remains unchanged.

**Looking after the Environment** – Identifies designations relating to landscape, biodiversity and historic heritage that are illustrated on the Policies Map, updating these as necessary. Some designations are defined locally by the Council, in consultation with its advisers, whilst others reflect designations that are set at a national or European level.

**Place Strategies** – Individual strategies are set out in the Core Strategy for each of the Borough's town and large villages and for the countryside. The Place Strategies within the

Site Allocations set out how these place visions will be delivered by pulling together key allocations by settlement, rather than by use.

**Monitoring and Review** – provides further explanation (in addition to that set out in the Core Strategy) regarding how sites will be monitored and any issues with delivery addressed.

**Appendices** – provide more detailed information, including an updated schedule of superseded policies, a glossary and a revised housing trajectory.

**Appendix 2**

**Site Allocations Preparation Stages**

Stage Completed

Not yet done

| Stages of the Site Allocations | Date |
|---|---|
| Adoption | Feb 2016 |
| Examination | Oct 2015 |
| Submission Stage | July 2015 |
| Publication of and representation on Pre-Submission | Sept 2014 |
| Adoption of Core Strategy* | Sept 2013 |
| "Shaping the Masterplan" consultation on Local Allocation LA3 | July 2013 |
| Stakeholder Workshops and meetings on Local Allocations LA1-6 | May 2013 |
| Consultation Report on Issues & Options Paper (Nov 2006-Feb 2007) – Volume 1 | Oct 2010 |
| Supplementary Issues and Options Gypsy and Traveller Consultation | Dec 2008 |
| Sustainability Appraisal (incorporating Strategic Environmental Assessment) Working Note on Supplementary Issues and Options | Dec 2008 |
| Supplementary Issues & Options Consultation | Nov-Dec 2008 |
| Sustainability Appraisal & Strategic Environmental Assessment Working Note on Supplementary Issues and Options | Dec 2006 |
| Issues & Options Consultation | Nov-Dec 2006 |
| Sustainability Appraisal Scoping Report | Feb 2006 |

**We Are Here**

**Note: Please see Figure 2 in Core Strategy for stages in the preparation of that document.*

**Appendix 3**

## Extract from Local Development Scheme (February 2014) - Programme of Development Document Production

| SUBJECT | 2014 | | | | | | | | | | | | 2015 | | | | | | | | | | | | 2016 | | | | | | | | | | | | 2017 | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| ▼▲ = 3 year period 2014/17 | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec |
| | | | ▼ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | ▼ | | | | | | | | | |
| **Development Plan Documents** | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Site Allocations | | | | | | | | | P | | | | | | | | | S | | | E | | | | | A | | | | | | | | | | | | | | | | | | | | | | | |
| Development Management Policies | | | | | | | | | I | | | | | | | | | | | P | | | | | | | | | | S | | | E | | | A | | | | | | | | | | | |
| Single Local Plan (incorporating Partial Review) | | | | | | | | | | | | | | | | | | | | | | | I | | | | | | P | | | | | | | | | S | | | | E | | | A | | | |
| East Hemel Hempstead Action Plan | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Proposals Map - Updating | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

**Key:**

I - Issues and options consultation (consultation stage)
P - Pre-Submission / Proposed Submission consultation (representations stage)
S - Submission of plan and associated documents to Secretary of State
E - Examination of plan by the Planning Inspectorate
A - Adoption of plan by the Council

***Notes:***

- *The Core Strategy was adopted in September 2013 and so is not shown on this programme*
- *All timings are subject to the programming of Cabinet and Full Council meetings and the availability of Planning Inspectors to conduct the Examinations.*
- *The timetable will be subject to review through the Annual Monitoring Report and any necessary changes to programming made.*

# Minutes from Full Council (extract)

# 9th July 2014

Notes of Key Decisions/ Action Points

Meeting: Council

Date: 9 July 2014

| Agenda Item | Decision |
|---|---|
| | 8.10 Dacorum Local Planning Framework: Pre-Submission Site Allocations (CA/080/14).<br><br>1. The Site Allocations Pre-Submission documents for publication and comment.<br><br>2. Delegated authority to the Assistant Director (Planning Development and Regeneration), to finalise the Report of Consultation and Sustainability Appraisal and, in consultation with the Portfolio Holder for Planning and Regeneration, to make any factual or non-substantive changes and amendments to the Pre-Submission Site Allocations and to insert the Indicative Spatial Layout plan into Policy LA3 West Hemel Hempstead prior to consultation commencing.<br><br>3. The Site Allocations for publication, seeking representations in accordance with the Statement of Community Involvement and relevant regulations.<br><br>4. The following procedure for considering future issues on the Site Allocations:<br><br>(a) If significant new issues are raised in the representations on the forthcoming consultation, to report to Cabinet and Council for a decision as to whether any change to the Site Allocations is justified;<br><br>(b) If there are no significant new issues, to delegate authority to the Assistant Director (Planning, Development and Regeneration) to:<br><br>(i) Submit the Site Allocations for Examination; and<br><br>(ii) In consultation with the Planning and Regeneration Portfolio Holder, to agree any minor changes to the Site Allocations to resolve objections and improve clarity of the document. |

# Appendix 6:  Minutes / Correspondence from Key Meetings

# Minutes of the "Extraordinary Meeting on LA5" – 3 November 2014

## LA5 Draft Master Plan Briefing

### Introduction

This extraordinary meeting of the Town Council was called to allow the Council to hear the views of more members of the public on the LA5 Draft Master Plan, prepared by Dacorum Borough Council's Strategic Planning Department, before the Town Council responded itself to Dacorum Borough Council on the Plan.

It is important that people are aware of the planning processes behind the preparation of the LA5 Draft Master Plan and the roles of the different organisations involved, particularly Dacorum Borough Council and Tring Town Council.

### What is the LA5 Draft Master Plan?

In 2004 the then Government required District Councils - Dacorum Borough Council for us - to produce a series of documents, collective known as the Local Planning Framework, that set out:

- Policies and proposals for the development and use of land in the district up to 2031
- A vision for the future of Dacorum and objectives and targets that developments must meet

In setting the District Councils this task the Government set out procedures that must be followed to ensure that any Local Planning Framework developed was well grounded with a firm evidence base; that all stakeholders had contributed fully; and that there had been extensive consultation along the way, including public consultation. The Statement of Community Involvement (adopted in June 2006) set out how Dacorum Borough Council intended to consult on the planning documents that together make up the Local Planning Framework.

This process culminated in a submission to the Planning Inspectorate in 2012 of the Core Strategy for independent scrutiny. The final, approved version was adopted by Dacorum Borough Council on 25th September 2013. The Core Strategy (together with policies 'saved' from the earlier Dacorum Borough Local Plan) will be used to assess any planning applications that are submitted to Dacorum Borough Council.

A central feature of the Local Planning Framework is an assessment of the number of houses needed between 2006 and 2031 across Dacorum, possible sites for these houses and the necessary infrastructure. For potentially large development sites identified, such as LA5, a 'Master Plan' is helpful to set out a vision for the site and an outline specification. Once agreed the Master Plan is almost like a 'check list' for developers, as Planning Officers will expect their planning applications for the site to meet this brief.

The following are the roles of organisation and the public in the preparation of the LA5 Draft Master Plan:

| | |
|---|---|
| • Dacorum Borough Council | Preparation of the LA5 Draft Master Plan and approving (or not) any subsequent planning applications |
| • Tring Town Council | A consultee on the draft master plan |
| • Residents of Tring | Consultees via either or both of (i) the Town Council (ii) directly to Dacorum Borough Council |
| • Developers (Cala Homes) | Submission of planning application(s) for any actual development on the site |

Both Tring Town Council and Tring Residents will be consultees when planning applications are submitted.

**The Objective of this meeting**

There is only one item on the agenda of this evening's meeting – it is for the Town Council to agree its response to Dacorum Borough Council's consultation on the LA5 Draft Master Plan.

To achieve this the Town Council wants to hear the views of town residents on the proposals in the Master Plan during the public participation part of this evening's meeting, before Councillors discuss the Master Plan.

**Concerns Previously Expressed**

During the preliminary stages of the development of the Draft Master Plan the Town Council responded to the initial 'Vision Statement' that was the result of the Community Workshop held on the 16th May 2013. The full response is appended, but the following excerpts are highlighted:

> "Whilst there is an existing need for speed enforcement on the Aylesbury Road and Icknield Way that will be magnified by the development, the importance of the Icknield Way as a primary route taking traffic (including heavy vehicles) away from the town centre should not be overlooked"
>
> "Education – adequate provision of school places is a potential issue. There are already predictions of a sharp increase in primary school numbers, with knock-on effects for the secondary school. The impact of the new development on the situation needs to carefully assessed and appropriate steps taken"
>
> "Reference is made to traveller site(s). The Council would suggest that there are more appropriate sites in Tring"

The following is a summary by category of the issues raised by members of the public at the Town Council meeting held on Monday 20th October 2014 when this matter was first discussed.

- Traffic. Many local roads are already busy and more houses will add to the problem
- School Provision. Will sufficient places be made available for the resulting increase in pupil numbers?
- GP Provision. Will there be capacity for the increase in population?
- Traveller Site. Why was the proposed site chosen?

In addition to the above there were also questions about the number of houses to be built and the role of the Community Workshop.

It is important to bear in mind that the objective of Dacorum Borough Council's consultation is find out the views – positive and negative- and the concerns of the public in order to answer them collectively at a later day when all the comments have been collated and to

amend the draft accordingly. Answers, however, can be given to questions relating to the preparation of the plan to better understand the processes followed.

Since the Town Council meeting on Monday 20th October, the Town Council has been talking to both Dacorum Borough Council and Hertfordshire County Council about the point raised. The following are the responses gathered so far.

*Q – Where does Tring sit is relation to DBC's overall housing commitment as a percentage?*

A – The Borough Council has identified that around 480 homes should be built within Tring between 2006-2031. The following information provides a detailed breakdown of the housing levels and progress on delivery.

| | Hemel Hempstead | Berkhamsted | Tring | Bovingdon | Kings Langley | Markyate | Rest of Dacorum | Total |
|---|---|---|---|---|---|---|---|---|
| Target | 8800 (78%) | 1180 (10%) | 480 (4%) | 130 (1%) | 110 (1%) | 200 (2%) | 420 (4%) | 11,320 (100%) |
| Completed (06-13) | 2165 (19.1%) | 480 (4.2%) | 115 (1.0%) | 20 (0.2%) | 40 (0.4%) | 49 (0.3%) | 129 (1.4%) | 2998 (26.5%) |

*Q - If this development gets built what happens to all the other land that is owned by developers such as Icknield Way F.C/Station Road? At what point will it be decided that there are enough houses built in Tring?*

A – The Core Strategy sets a target (to be treated as a minimum) of 10,750 homes for Dacorum as a whole. If 'windfall' development (development that cannot easily be predicted or fully planned for) is added to this figure, the expected number of new homes rises to 11,320.

Since the adoption of the Core Strategy the Government's own assessment of full housing need for the Borough is about 13,500 new homes (up to 2031). The Borough Council is undertaking an early partial review of its Core Strategy in order to assess whether this need will be met. This process will begin next year and a new plan should be in place in 2017/18. It is through this early partial review process that the Council will need to reconsider the need for development on other sites throughout the Borough.

*Q – Why was the green belt boundary altered to make way for this development and what other brownfield sites were considered ahead of this development?*

A – The Borough Council undertook an assessment of potential housing land in order to consider how many houses could be provided within the existing urban areas of the Borough. This land alone could not meet the housing target. Therefore Dacorum Borough Council is having to release land from the Green Belt for housing.

The Core Strategy identified where these releases would be and their broad size. The Site Allocations document (upon which the Council is currently consulting) will define precisely where the new boundaries for the sites are and hence where the new Green Belt boundaries are drawn.

It should be noted that the Dacorum Borough Council cannot force a land owner to bring forward land for development.

*Q – Who was involved in the workshops that were run last year on the development consultation?*

A – A number of key consultees (representatives of the highway authority, education authority etc.), Councillors, stakeholders in the development of the site and local residents were invited to attend this Community Workshop, which was an opportunity for participants to develop and share their ideas on the form of the development.

*Q – How is the Council going to ensure that the 40% of affordable homes will go to Tring residents first and not a family who doesn't contribute to the existing Tring economy?*

A – The Borough Council has a clear housing allocation policy for the occupation of affordable homes which will need to be followed. Amongst the eligibility criteria is a requirement for a local connection (with Dacorum).

*Q – Why is Berkhamsted only having a smaller Green Belt release of 40 homes and no travellers' site despite the town being larger?*

A – As can be seen from the table above there is a far greater commitment to provide housing in Berkhamsted than that identified by local residents. The proposals for Berkhamsted already include a number of sites coming forward from the previous Local Plan (for example the Egerton Rothesay school site). It has been agreed by the Borough Council that its requirement for Gypsy and Traveller sites should be met adjacent to new allocated housing sites of which three sites have been identified that correlate to the scale of development being proposed.

*Q – What will happen with the Community Infrastructure Levy (CIL) and how will this benefit Tring?*

A – The CIL is a tax on new development which is chargeable per square metre. The CIL is charged in order to fund necessary infrastructure improvements to support housing and other forms of growth. The Council is obliged to pass on a meaningful proportion of CIL (15%) to the Town Council to undertake improvements to infrastructure in consultation with local residents. The remaining CIL funds will be subject to bids from infrastructure providers (HCC for schools, transport, etc.; Herts Valley Clinical Commissioning Group in terms of GP provision and health; DBC for open space and play space) to carry out improvements within the Borough.

*Q – What plans are in place to support local schools and make more places available?*

A – The Borough Council has discussed education with the County Council as the statutory provider of education needs.

The County Council say that the lack of school places is a temporary problem. Long term forecasts identify latent capacity within schools and a potential requirement for modest extensions to existing educational premises. A feasibility study will be required to examine the most suitable school(s) for expansion. It is likely that CIL funds will be used to fund such improvements.

At a meeting with Town Councillors, an Officer from Hertfordshire County Council explained the methodology used to match school capacity with demand and how they appreciated Dacorum Borough Council's assistance. The methodology appeared rigorous and a reliable basis for their conclusions. Assurance was given that capacity would be there to meet the extra demand resulting from the development.

*Q – What plans are being put in place to support local healthcare and make more spaces available?*

A – The Borough Council has discussed health provision with the Herts Valley Clinical Commissioning Group and its predecessor the Primary Care Trust. The information they have provided is contained in the Infrastructure Delivery Plan (InDP). We are being advised that there is capacity for 3,500 registrations which should comfortably accommodate growth in the town. [Due to changes currently taking place within the NHS it was not possible to invite a suitable representative to the meeting]

*Q – The transport links being talked about in LA5 are cycle paths, how are you proposing that the current road infrastructure will cope with an additional 400 cars?*

A – The site has been subject to an initial consideration of transport issues in advance of the Core Strategy and will continue to be subject to assessment throughout the planning application process. The highway authority is satisfied that the impact of development has been considered and can be accommodated without significant detriment. At this stage the precise details of highway improvement works are not finalised, however they are likely to include measures identified in the Tring, Northchurch and Berkhamsted Urban Transport Plan and in the InDP. Junction improvements required as a result of the LA5 site will be paid for either through CIL or other mechanisms that are available to secure developer contributions. Please note that although the transport work for LA5 has been and will continue to be undertaken by transport consultants employed by the developer, the assumptions and inputs for this work are always agreed with HCC as the highway authority.

*Q – What is to become of the land that St. Francis House school is currently on?*

A – A planning application has not been received by Dacorum Borough Council and there have been no discussions at this point between the Borough Council's Planning Department and the landowner about their future plans for the site. It is possible that a planning application could be submitted for a redevelopment of the site and this could include residential uses. The development of this site would not reduce the need to develop the land to the west of Tring, merely help the Borough to meet some shortfall against its objective housing needs.

**Conduct of the Meeting**

As previously stated, the purpose of this meeting is for the Town Council to decide its response to the LA5 Draft Master Plan having heard the views of the members of public.

Members of the public will be invited to speak during the public participation session. When addressing the Council please state your name and address. If the comment you wish to make has already been made by another parishioner, please just say that and just raise those points that are new to the session, if any.

Members of the public invited to speak are addressing the Council as a whole, not individual members. Questions are not to be debated – only the Chair addresses the member of the public unless the Chair refers to the Clerk or representatives of other organisations to clarify a point.

Once the public participation session has been closed by the Chair, members of the public can only observe and not take part in the Council's deliberations.

## LA5 West of Tring Draft Master Plan

### Introduction

These are the preliminary comments from the Town Council – please note that they are indicative as they have not been ratified by Council resolution.

### Overall

The Council felt that the outline for the draft master plan for this development was soundly based, building upon the views expressed at the Community Workshop. The Council is extremely aware that the site's location makes it strategically important, whilst posing difficulties that must be overcome to fulfil its potential as an enhancement to the Town.

### Q1. Are there any important constraints or opportunities that are missing from these two lists?

The lists cover the majority of constraints and opportunities. The Council would like to emphasize, however, the importance of the site as a gateway to Tring. Tring is a historic market town with a distinctive character that nestles harmoniously in a gap in the Chilterns, an A.O.N.B. The development should reflect this and be of a design and character which says it is part of Tring and that visitors have arrived in Tring. This does not mean slavish duplication of existing designs, but the use of designs that capture the essence of Tring. It should not be a development that could be anywhere in the country.

The development on the extreme west of Tring gives an opportunity to integrate the existing western parts of Tring more fully with the town e.g. boosting the shops on Western Road.

### Q2. Is this a reasonable vision or expectation?

In the light of the opportunity outlined in the answer to question 1, yes.

### Q3. Are these appropriate development principles?

Yes. The Council has three characteristics that it would like to see underpinning the development principles:

- The development has an identity of its own, with the design and facilities fostering community spirit. The role of local shop(s), etc. is important
- Notwithstanding the above, the development is part of Tring and should feel part of Tring, fully integrated through footpaths, cycleways and public transport
- Tring is a Transition Town (and a Fair Trade Town). There is an opportunity for the development to reflect this by fully embracing the concept of sustainability/Eco-friendliness to become a model of such, rather than just paying lip service. Sensitive design e.g. the orientation of houses to minimise the effect of the exposed location can achieve this.

Countryside – the perimeter tree planning is welcomed. Care should be taken that, whilst screening the visual impact that the development has on the surrounding countryside, the planting does not itself become dominant or enclosing. The recommendation is that the northern side is screened but with trees that will not go higher that the (two-storey) ridgeline. Poplars are recommended for the south because they will not overshadow properties behind

and will give a good compromise between providing a screen and not isolating the development.

Whilst there is an existing need for speed enforcement on the Aylesbury Road and Icknield Way that will be magnified by the development, the importance of the Icknield Way as a primary route taking traffic (including heavy vehicles) away from the town centre should not be overlooked.

Mixed Development – the draft makes good reference to screening and separating the industrial development from the residential development; however, the Council would like to stress the importance of protecting against sound pollution. Units on the existing industrial estate do generate noise and this should be mitigated.

**Q4. How should the open space be managed?**

There is an expectation that the open space be managed by the District Authority, possibly financed by a developer contribution. Whilst there is a shortage of pitches for outdoor team sports in the town, the provision of space for unstructured play is welcomed.

**Q5. Are there any gaps in local service provision which should be met within the new development?**

Education – adequate provision of school places is a potential issue. There are already predictions of a sharp increase in primary school numbers, with knock-on effects for the secondary school. The impact of the new development on the situation needs to be carefully assessed and appropriate steps taken.

Reference has already been made to shop(s) and public transport. The Woodland Cemetery is very welcome.

**Q6. Should a focal point be created within the development? If so, how?**

To fulfil the characteristics outlined in the Council's response to question 3, a focal point is required. It should be centrally located, easily accessible and child friendly.

**Other**

Reference is made to traveller site(s). The Council would suggest that there are more appropriate sites in Tring e.g. the Old Waste Disposal site. Within the development, consideration should be given to a discrete position, with good access to the Icknield Way close to the industrial estate. It should not be detrimental to the cemetery expansion.

# Minutes of Meeting with Schools and Families Unit, Hertfordshire County Council

# May 2015

## MEETING MINUTES

| | | |
|---|---|---|
| **Subject:** | Site Allocations – Hertfordshire County Council Representation | |
| **Date & Time:** | Wednesday 20th May 2015 | |
| **Location:** | Dacorum Borough Council, Room 319, 2nd Floor, Civic Centre, Hemel Hempstead. | |
| **Present:** | Chloe Thomson (CT) | DBC – Strategic Planning |
| | Laura Wood (LW) | DBC – Strategic Planning |
| | Robert Freeman (RF) | DBC – Strategic Planning (Infrastructure) |
| | Matthew Wilson (MW) | HCC – Development Services |
| | Vicki Roberts (VR) | HCC – Children Services |

| | **Minute** |
|---|---|
| **Purpose of Meeting** | To discuss HCC's representation to the Pre-submission Site Allocations DPD consultation with specific regard to:<br>- Nash Mills education zone (EZ/1);<br>- West Hemel Hempstead (LA3);<br>- Playing fields at Dunsley Farm, Tring; and<br>- East Hemel Hempstead education provisions. |
| **Nash Mills EZ/1** | Identified demand for new 2-form entry primary school in the southern area of Hemel Hempstead to meet future needs.<br><br>Three potential locations for a school within the proposed education zone:<br>a) Land to the south of Nash Mills Lane (behind Trefoil House and allotments);<br>b) Land to the north of Nash Mills Lane (Red Lion PH side); or<br>c) Land to the south of Red Lion Lane (opposite the former Sappi site). |
| | HCC preference is currently site A identified above, however, a number of matters to consider and investigate further including:<br>- Gaining safe and suitable access off the highway;<br>- The physical size and capacity of the site;<br>- Assessment of flood risk;<br>- Consideration of lease arrangements of current site occupiers (land owned by DBC);<br>- Investigation into the presence and remediation of any contamination at the site (former landfill). |

| | |
|---|---|
| | |
| | LW added that, in terms of development in the Green Belt, the site does contain some defensible and defined boundaries – e.g. Grand Union Canal, railway bridge). |
| | ***Action:*** *LW to forward email from DBC Estates team regarding current leases.*<br><br>***Action:*** *RF to find out how allotments are managed and whether there are also leased.* |
| **West Hemel Hempstead (LA3)** | Proposed Local Allocation LA3 is within the ownership of three landowners: HCC Estates, Taylor Wimpey and the Homes and Communities Agency (HCA). Heads of terms have been drafted with the purpose of relinquishing HCC-owned land to Taylor Wimpey. |
| | LW confirmed that an outline planning application for comprehensive development of the whole site will be required as set out in the Pre-submission Site Allocations DPD and associated master plan. Thereafter phases to be delivered through reserved matters, including delivery of a new school. |
| **Tring** | An omission within the Pre-submission Site Allocations DPD was identified by HCC through their representation which related to the provision of detached playing fields in the event that they are required following expansion of Tring Secondary School. |
| | HCC have identified land at Dunsley Farm off London Road as a site to provide these playing fields.<br><br>The final dimension of land to be allocated has been agreed amongst the relevant HCC teams and will be forwarded to CT/LW by early week commencing 26th May 2015.<br><br>***Action:*** *MW to forward plan and area of land to be allocated for playing fields for use by Tring Secondary School.* |
| **East Hemel Hempstead** | In reference to the development at Spencers Park, LW confirmed that Phase 1 has outline planning permission and Crown Estates will be taking the lead on developing the master plan for Phase 2. The master plan will include details of:<br>- Access;<br>- A Local Centre; and<br>- 2-form entry primary school. |
| | The potential site at Wood Lane End will not now come forward as a possible site for a new school. |
| | A new 6 to 8-form entry secondary school would be required to meet local demands as a result of development in east Hemel Hempstead (Area Action |

| | |
|---|---|
| | Plan) and within St Albans' administrative area (Gorhambury Estate). |
| | ***Action:*** *Amend Pre-submission Site Allocations DPD to refer to need for new primary school in Phase 2 of Spencers Park (paragraph 7.10 and Table 2).* |

# Email from Highway England following meeting to discuss Site Allocations Representations

You forwarded this message on 06/05/2015 09:34.

From: Volp, Jenny <Jenny.Volp@highwaysengland.co.uk>
Sent: Wed 06/05/2015 09:11
To: Francis Whittaker
Cc: Hall, Stephen; Laura Wood
Subject: Dacorum site allocations

Dear Francis

Thank you for meeting me last week on 30 April. It was good to understand the process and the stage that your Council is at regarding the site allocations document and the Core Strategy. We discussed the Highways Agency's (now Highways England) response to the both of these consultations. I would like to re-iterate that neither letter is an objection to the consultations – it is for your local council to decide on the housing numbers that it needs to support its local communities. I did however set out a number of concerns regarding the level of transport information that was available at the time of my response.

However, following our discussion last week, I understand that work is ongoing to address this and that you are also working with Hertfordshire County Council to understand the transport model outputs and the impact on the local and strategic road network. It would be useful if you could confirm this and set out what work is taking place, along with timescales for when you will have a clearer idea on the impact. I understand that you have already used the Hemel Hempstead Traffic model, to assess the impact of the proposals for the Maylands area, but that this does not extend to J8 of the M1. Sue Jackson at Hertfordshire County Council is investigating J8 of the M1, so may be able to support and advise you on what further steps are needed to assess the impact on the junction. You will recall that I also had a concern about the impact on J20 of the M25 – I understand that Hertfordshire County Council are developing a County wide transport model – it may be that this can help you understand the impact, even if it is a high level. However I am unclear on timescales and whether this will fit with your programme.

I also understand that your council will be carrying out an early review of the Single Local Plan in 2017/18, and that you will be investigating the traffic impact as part of this process. Again, it will be useful to understand what your council will be doing to ensure that the strategic road network is included.

As I said earlier, it was good to meet you and please do not hesitate to contact me again and discuss any of the above further. I would like to support you through this process. I currently work closely with the County and the LEP to understand that impact of the growth in Hertfordshire on Highways England's road network and will continue to do so. I also have good relationship with other local councils with the aim of supporting them in delivering the growth. It would be great to have a similar relationship with Dacorum to support the delivery of the growth that you have identified.

Best Wishes

**Jenny Volp, Asset Manager - Area 8**
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
**Tel**: +44 (0) 1234 796590
Web: http://www.highways.gov.uk
GTN: 3013 6590

# Minutes of meetings with Thames Water and the Environment Agency

# February 2015

**Meeting notes for: Sewer Infrastructure in Dacorum. 13/02/15**

**Attendees:**

Chloe Thomson – Strategic Planning and Regeneration Officer (SPAR) – DBC

Heather Overhead – Assistant Team Leader, SPAR – DBC

John Ware – Interim Group Manager, Development Management – DBC

James Doe – Assistant Director, Planning, Development and Regeneration – DBC

Mark Matthews – Town Planning Manager – Thames Water (TW)

Amy Appleyard – Asset Planner – TW

**Introduction**

CTh outlined the purposes of the meeting:

1) To discuss the reps raised by TW in response to the recent Site Allocations consultation
2) To discuss the current update to the Council's Infrastructure Delivery Plan (IDP)
3) To discuss potential solutions for the advancement of Spencers Park

**Site Allocations Reps**

CTh outlined that the key concerns raised by TW in their reps relate to the ability of the sewer network to support the development of a number of sites in the document, which causes concern to DBC regarding the viability and deliverability of these sites.

AA stated the importance of knowing when developments are likely to come forward for TW's strategic planning work. She stated that the site at Three Cherry Trees will cause problems for the network as there are significant 'pinch points' in that part of the network. She added that any large scale development to the East of Hemel Hempstead within St Albans district is likely to cause significant problems to the local sewer network, and potential to the capacity of the Waste Water Treatment Works (WWTW) at Maple Lodge.

MM stated that it is good practice to highlight concerns now, so that developers/ landowners can start drainage and sewerage assessments in good time. A lot of upfront work can be required for development sites. He stated that prior to submission of the Site Allocation DPD all major sites (resi and commercial) should have a sewer impact assessment and that the landowners are responsible for doing these – they should contact Thames Water's Developer Services team.

CTh informed TW about the reps raised in objection to the Site Allocations consultation by the Environment Agency (EA).

MM considered the EA's two main concerns to be:

- the adequacy of DBC's Water Cycle Study (WCS) with regards to demonstrating how the Water Framework Directive will be met; and
- the adequacy of the local sewerage network to cope with the planned level of development following on from TW's reps to the consultation.

With regards to the former, MM suggested that DBC commissions an update to the WCS prior to submission of the Site Allocations DPD. With regards to the latter issue, MM will contact the EA to discuss their objection.

Actions for DBC:

- contact landowners/developers of relevant sites about undertaking a sewer impact assessment.
- Ask a member of the regeneration team to contact AA about the planned development in the town centre and the potential need for a drainage plan (need to co-ordinate all type of drainage).

Actions for TW:

- MM to phone Kiera Murphy at the EA to discuss their reps to DBC's Site Allocations consultation.

**The IDP update**

CTh will send information showing DBC's housing trajectory by ward to TW by the end of the day so that they can provide information on where likely problems in the network may occur.

MM confirmed that TW is obliged to treat waste water properly and that their ability to do this should not impact on strategic growth planned by the council. He confirmed that developers are not usually required to contribute towards improvements to WWTWs, but that they are normally required to contribute towards improvements to the sewerage network.

AA confirmed that recent detailed modelling of planned development in the SW Herts region shows that upgrades to Maple Lodge WWTW are not required during AMP6 (2015-20) but may be during 2020-2030. However, she cautioned that if significant levels of development occur to the East of Hemel Hempstead in St Albans District

then upgrades to Maple Lodge WWTW may be required earlier. Further she stated that large-scale development here would cause serious concerns with regards to surface flooding and in health and safety terms with regards to the associated impacts on the two balancing ponds in the vicinity.

Actions for DBC:

- CTh to send AA and MM housing trajectory information and ward map
- CTh to send AA and MM text from IDP report

Actions for TW:

- AA to consider housing trajectory information and advise DBC on impact of network of planned growth.
- MM/AA to provide updates to the IDP report text and schedule

**Spencers Park**

JD outlined the issues the Council has had with the progression of Spencers Park, namely that the late nature of the TW's request for a drainage assessment and strategy is causing significant delay to the development. He is very keen to avoid this scenario in the future.

AA acknowledged this but stated that dialogue with Barratts dates back to 2012.

MM stated that he is working with other water agencies to try and develop some good practice guidance on how to avoid situations like this.

AA stated that the detailed drainage strategy for Spencers Park will be ready in July, and she would be hesitant to sign it off as ok before the strategy is in place.

JD confirmed that it is not possible to have planning conditions on reserved matters.

MM referred to a potential solution being a new sewer in Cupid Green Playing Fields.

Actions for DBC:

- JD to organise a meeting between DBC, Barratts and Thames Water (Mark Dickinson, and invite MM)

Actions for TW:

MM is aware of another Barratts development with similar problems and will send details of the solution to JD/JW.

# February 2015

## MEETING MINUTES

| | | |
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| **Subject:** | Site Allocations – Environment Agency objection (waste water infrastructure) | |
| **Date & Time:** | Monday 23rd February 2015 | |
| **Location:** | Environment Agency, Apollo Court, Bishops Square, Hatfield. | |
| **Present:** | Chloe Thomson (CT) | DBC – Strategic Planning |
| | Catriona May (CM) | Watford Borough Council |
| | Vicky Owen (VO) | Watford Borough Council |
| | Rachel Keen (RK) | Environment Agency |
| | Clark Gordon (CG) | Environment Agency |

| | **Minute** |
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| **Purpose of Meeting** | Following objection to their Local Plan Part 2 consultation, WBC arranged a meeting with the EA to discuss their concerns and how to overcome them in order to progress the Local Plan to examination.<br><br>DBC received similar comments from the EA regarding Pre-submission Site Allocations DPD and therefore joined the discussion. |
| **Reason for Objection** | The EA objected to Site Allocations – no evidence to demonstrate that the proposed site allocations can be supported with the appropriate infrastructure without detriment to the water environment – therefore <u>unsound</u>.<br><br>Matters to discuss<br>- Need for updated Water Cycle Study ('WCS');<br>- Thames Water comments/crossover as statutory undertaker;<br>- Flood risk comments.<br><br>CT set a context for the meeting stating that both DBC and WBC were looking for guidance from the EA as to what was required (as a minimum) to demonstrate that infrastructure improvement works/solutions can be delivered ahead of planned growth and therefore that the proposed site allocations were deliverable. |
| **WCS Update** | The 2010 WCS scoping report highlights waste water network capacity and wastewater treatment works (WWTW) issues within Dacorum and Watford based upon two RSS-based projected growth scenarios.<br><br>Specifically identifies constraints within the network system to accommodate growth and need for upgrade works to Maple Lodge (or Blackbirds) WWTWs, particularly in respect of planned growth at Hemel Hempstead and Watford.<br><br>Evidence required demonstrating that growth can be accommodated with |

<table>
<tr><td></td><td colspan="2">appropriate infrastructure improvement works/solutions to handle additional waste water and to ensure that there is no detriment to the environment.<br><br>Incidences of sewer flooding and seepage have been recorded already. Particularly during times of high ground water levels, leakage occurs with water into the sewers which ultimately reduces capacity.<br><br>Chalk river network is particularly susceptible to environmental degradation from such incidences.<br><br>RK added that the scoping report also highlighted the possibility of providing a new WWTW at Hemel Hempstead to treat waste and reduce flows toward Maple Lodge. CT highlighted that this was a feasible option for longer term growth due to the timescales needed to construct such a facility but wouldn't assist with current growth plans to meet needs.<br><br>RK stated that Hertsmere BC also fall within the Maple Lodge catchment area but the EA have not been approached by them.<br><br><u>Update since meeting:</u> HBC's Infrastructure Assessment (2013) identifies similar network capacity issues and identifies need for upgrade works to Maple Lodge or Blackbirds WWTWs (or both).</td></tr>
<tr><td>Thames Water</td><td colspan="2">CT highlighted the fact that developers have a right to connect to the network (once planning permission granted) and the statutory undertakers are obliged to accommodate that connection and the additional flows.<br><br>Thames Water have not raised objections to the Council but placed the onus on developers to deal with the impact on the sewer network upfront through a Drainage Strategy and/or Sewer Impact Assessment. However, it was agreed that this does not deal with the wider network issues and is a piecemeal approach to a bigger problem across the catchment area.</td></tr>
<tr><td>Flood Risk</td><td colspan="2">CT asked RK and CG whether her interpretation of the EA's representation to DBC's Site Allocations DPD meant that the sites at risk of flooding but not incorporated into DBC's Strategic Flood Risk Assessment (SFRA) could be satisfactorily considered and mitigated at the planning application stage through site-specific FRA's.<br><br>RK read the EA's letter dated 12th December 2014 (from Kiera Murphy) and confirmed that this was the correct interpretation of what was written.</td></tr>
<tr><td>Options</td><td colspan="2">In summary of the discussion, DBC and WBC have three options to consider in terms of progressing their Site Allocations DPD and Local Plan Part 2 (respectively):</td></tr>
<tr><td></td><td>A) Utilise the County Council's planned Water Project to</td><td>Pros:<br>Would address the bigger picture in</td></tr>
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| | complete modelling and identify solutions for the wider sewerage network across Hertfordshire. | terms of WWTWs & sewerage network within SW Herts catchment area.<br>**Cons:**<br>The project brief currently identifies two stages which make the project quite lengthy:<br>1. Modelling which will take 3-6 months;<br>2. Assessment phase (scenario testing, identify infrastructure needs & updated WCS) – up to a year.<br><br>Timescales too long to assist with Site Allocations DPD. |
| | **B)** Each LPA completes their own updated WCS | **Pros:**<br>Would be the quickest means of gathering the required evidence.<br>**Cons:**<br>Would delay submission of the SA DPD to Cabinet and PINS; and<br>A piecemeal approach to issues throughout the SW Herts catchment area. |
| | **C)** Submit Site Allocations DPD without any further evidence. | **Pros:**<br>Would meet current LDS timescales and would not impact upon the EPR.<br>**Cons:**<br>Risk of Inspector finding Site Allocations DPD unsound and would be required to complete further technical work post-examination. |
| **Conclusion** | Option B would be the most appropriate way to overcome EA's objection and an updated WCS should therefore:<br>- Revisit scoping study (2010) and update growth targets (post-RSS, current LDF targets);<br>- Conduct stage 2 of study to identify solutions to infrastructure requirements to ensure that growth can be accommodated; and<br>- Assess potential solutions in terms of impact upon the environment.<br><br>Option A would require liaison with HCC to revise project brief and ensure outputs following modelling stage take account of DBC's needs. | |
| **Other Advice** | Site Allocations should take account of any Surface Water Management Plan for Dacorum as well as the SFRA. | |

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| | SUDs requirement to be incorporated into master planning for local allocations – developers should be looking to achieve off-site improvements as well as greenfield run-off rates within the development site.<br><br>CG advised that DBC's SFRA Level 1 is based upon historic surface water flooding events. Surface Water flood maps have now been updated and therefore the Council should be looking to update their SFRA accordingly.<br><br>CG advised that the EA have no plans to update fluvial flood maps. However, as Three Rivers DC have done, DBC should consider doing refined modelling work along its water courses which could release further land for development and reduce need to complete sequential/exception tests thereby giving a greater degree of certainty to developers. |

# March 2015

## MEETING MINUTES

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|---|---|---|
| Subject: | Site Allocations – Waste water infrastructure | |
| Date & Time: | Monday 30th March 2015 | |
| Location: | Dacorum Borough Council, Civic Centre, Marlowes, Hemel Hempstead, HP1 1HH. | |
| Present: | Chloe Thomson (CT) | Dacorum Borough Council (DBC) – Strategic Planning |
| | Laura Wood (LW) | Dacorum Borough Council – Strategic Planning |
| | Vicky Owen (VO) | Watford Borough Council (WBC) |
| | Keira Murphy (KM) | Environment Agency |
| | Clark Gordon (CG) | Environment Agency |
| | Mark Dickinson (MD) | Thames Water |
| | Amy Appleyard (AA) | Thames Water |
| | Mark Mathews (MM) | Thames Water |

| | Minute |
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| Purpose of Meeting | CT explained the purpose of the meeting was to identify how DBC could progress with its Site Allocations DPD, and similarly to inform how Watford BC could progress its Local Plan Part 2, in light of the Environment Agency's objections.<br><br>Both DBC and WBC accept the need to produce further technical work following on from the Water Cycle Study – Scoping Study undertaken by Hyder Consulting on behalf of Dacorum Borough Council, Watford Borough Council, Three Rivers District Council, Welwyn Hatfield Borough Council and St Albans City & District Council in 2010.<br><br>The purpose of the meeting is to ascertain what technical work needs to be completed to progress with the current Site Allocations DPD for DBC and Local Plan Part 2 for WBC and how this ties in with Hertfordshire County Council's county-wide Water Project. |
| Water Cycle Study (WCS) | KM's initial view was that the Councils would need to complete some form of bespoke study, in collaboration with Thames Water, in recognition of HCC's lengthy Water Project timescales.<br><br>MD confirmed that St Albans have also been in discussion with Thames Water about doing an updated WCS.<br><br>MM quoted Cotswold District Council and South Oxfordshire District Council as LPAs who have experienced similar issues. |

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| | In terms of timescales, KM estimated that a revised WCS Scoping Study would take approximately 6 months to complete. CG added that the drivers for updating the previous 2010 study would include:<br>• Implications of the revised Water Framework Directive (WFD);<br>• Identifying areas of growth (as changed from 2010); and<br>• Changes to the management of flood risk.<br><br>CT confirmed the proposed timetable for HCC's Water Project which was split into 2 phases:<br>• Phase 1 – high-level modelling of planned growth, infrastructure options for water supply and waste water treatment, and critical assessment of the infrastructure planning and investment process. <u>To be completed by 2015/16</u><br>• Phase 2 (options) – finer level modelling at local level, sub-area based WCSs, and options for strategic packages of interventions for each scenario modelled. <u>To be commenced no sooner than 2016/2017</u> (following completion of Phase 1).<br><br>It was agreed that HCC's Water Project timescales would not assist DBC or WBC in the short-term in regard to progressing their Site Allocations and Local Plan Part 2. |
| Evidence Required for Progression | MM referred to Basingstoke & Deane BC's Local Plan which has been submitted to PINS and is awaiting examination. In addressing the need for growth and amendments to discharge consents at Chineham WwTWs, the Council and Environment Agency have completed a 'Water Quality Modelling Summary' which revisited their 2009 WCS modelling and committed the Council to Annual Environmental Monitoring.<br><br>MM also mentioned his work with the Greater London Authorities to produce Integrated Water Management Strategies for water supply and waste water treatment which provides a starting point for developers in terms of identifying constraints and infrastructure requirements.<br><br>The Environment Agency maintained their preference for the completion of some form of bespoke technical work to update the 2010 WCS and CG confirmed that the Environment Agency would not be able to support the Site Allocations DPD or Local Plan Part 2 without such evidence.<br><br>However, they would investigate the situation around Basingstoke and advise whether a similar approach could be taken by DBC and WBC in the short-term.<br><br>***Action:*** *CG/KM to investigate Basingstoke & Deane BC's 'Water Quality Modelling Summary' and advise whether this could be a mechanism for DBC and WBC to use in progressing their Site Allocations DPD and Local Plan Part 2, respectively.* |

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| | MM also confirmed that revised discharge consent levels (particularly for phosphate) will not be confirmed by the Environment Agency until the completion of trials for new technology – reporting on this is likely to be during 2017.<br><br>The consequence of this is that discharge consent levels determine whether upgrade works are required to WwTWs which in turn determines whether growth in that WwTW catchment area can be accommodated.<br><br>MD suggested that Thames Water and the Environment Agency discuss whether scenario modelling can be completed for some indicative discharge consent levels up to 2025. This would indicate whether upgrade works would be necessary for Maple Lodge WwTWs in the future to accommodate planned growth.<br><br>MD added that there are no plans to alter the discharge consent levels at Maple Lodge WwTWs during this current 5-year AMP period (2015-2020). |
| Conclusion | In summary, the following was agreed:<br><br>• The Environment Agency would consider a 'stop-gap' piece of work akin to that undertaken for Basingstoke & Deane BC ('Water Quality Modelling Summary') and advise DBC and WBC accordingly; and<br><br>• DBC agreed to draw up a tripartite Statement of Common Ground with the Environment Agency and Thames Water for submission to the Planning Inspectorate alongside the Site Allocations DPD. This would include a commitment to undertake an appropriate assessment (i.e. Water Cycle Study) in preparation for the New Local Plan and to take into account other requirements outlined in the example document circulated at the meeting. Thames Water and the Environment Agency to advise regarding any further text that should be incorporated into this Statement of Common Ground.<br><br>• Thames Water and the Environment Agency would meet separately to discuss modelling work for indicative discharge consent levels at Maple Lodge WwTWs. |