



# **Dacorum Borough Council**

## **Local Planning Framework**

### **DACORUM CORE STRATEGY EXAMINATION IN PUBLIC**

**Statement by Dacorum Borough Council**

**Issue 8: Meeting Community's Needs**

**Dacorum Borough Council**

**September 2012**

## **Purpose of this statement**

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

## Matters raised by Inspector

- 8.1 Have the needs for open space, sport and recreation facilities been appropriately assessed? Is the Council's evidence base (e.g. 2008 Open Space Study) sufficiently robust?
- 8.2 Is the Council's approach to the provision of community facilities satisfactory? Will community needs be met? Policy CS23 refers to Zones being defined in the Green Belt for new schools facilities. How will this be achieved? School facilities will also be supported on Open Land, which is defined as areas of open space over 1ha, protected from development. Is this approach justified?
- 8.3 Proposed minor change MC31 suggests that additions to the identified provision for community facilities "are possible". Where and when will such additions be identified and why can they not be identified in the Core Strategy?

## Dacorum Borough Council's Response

### **8.1 Have the needs for open space, sport and recreation facilities been appropriately assessed? Is the Council's evidence base (e.g. 2008 Open Space Study) sufficiently robust?**

8.1.1 When considering needs for open space, sport and recreation facilities it is important to distinguish between *needs* and *desires*, and between *allocation* and physical *provision*.

8.1.2 Dacorum Borough Council's primary role with regard to leisure is the identification of land rather than the actual delivery of services and facilities. This is carried out by the Dacorum Sports Trust (an arms-length organisation formed when the in-house leisure department was disbanded) and other providers i.e. local schools, sports clubs and societies.

8.1.3 The Borough contains a variety of leisure space, including public and private outdoor sports facilities for children and young people, allotments, parks and gardens. The Council is committed to identifying potential leisure needs – especially in areas where there is likely to be a significant change in population within an area in the future. This commitment is highlighted through the Council's new Sports Policy Statement and associated Action Plan (Examination Document SC7).

8.1.4 The Core Strategy is in conformity with the National Planning Policy Framework (Examination Document REG 15) in particular paragraph 73, which states that:

*"Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new*

*provision. The assessments should identify specific needs and quantities or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.”*

8.1.5 Policy CS23 and the supporting text is based on a series of robust assessments of the needs for open space, sports and recreational facilities within the Borough. These assessments have considered needs on a borough-wide basis, and also looked at the specific needs of individual places. Key documents are as follows:

- *Sports Policy Statement and Action Plan* (Examination Document SC7). This was drawn up to demonstrate the Council's commitment to sport. It was produced collaboratively with a wide range of organisations including the Hertfordshire Sports Network, Dacorum Sports Network, Dacorum Schools Sports Network, Sport England, Dacorum Sports Trust and representatives from the County Council and Primary Care Trust. It comprises a list of commitments from the Council relating to how it will help support and facilitate investment in local sport.
- *Dacorum Sport and Recreation Study - Indoor and Outdoor Leisure Studies* (Examination Document SC2 and SC3). This considered current provision and future demand for indoor and outdoor leisure needs across the borough and within specific settlements.
- *Dacorum Borough Council Town Stadium Study – Stage 1 and Stage 2* (Examination Document SC4 and SC5). The first study assessed the need for a new build sports facility within the town, to help meet the future needs of the town and also alleviate some of the pressure on existing facilities. This included updating the earlier assessment of leisure facilities for Hemel Hempstead. The stage 2 study looked in more detail at issues of building specification, site assessment, market testing and management options. The phase 2 study involved significant input from the Hemel Rugby League Club and Hemel Hempstead Town Football Club.
- *Retail Leisure Study* (Examination Document ED2), considered demands for retail-related leisure within the Borough.
- *Dacorum Borough Council Sports Facilities Audit 2011* (Examination Document SC6). This was originally called the Facilities Improvement Strategy. It was developed as a result of a working group comprising representatives of key organisations involved in sports provision, including the Borough and County Council, Dacorum Sports Trust, Sport England, the Primary Care Trust and the Dacorum Schools Partnership (see paragraph 15.19 of the Pre-Submission Core Strategy: Examination Document SUB1). The audit considers existing sport and recreation facilities in the Borough and what improvements are required to achieve a network of modern, accessible and quality facilities for the residents of Dacorum. It updates much of the information contained in the Indoor and Outdoor Leisure Study.

8.1.6 It is acknowledged that that some of the above studies were completed a number

of years ago. However, much of the key information has been updated through subsequent assessment work. It provides a proportionate evidence base for the Core Strategy and the strategic nature of the policies within this document. Some of the technical work (e.g. Open Space Study) reflects long-term land uses rather than subtle changes in demand, and so is unlikely to change significantly over time. The Council will consider whether further updates are required to inform a more detailed consideration of leisure needs as part of the Site Allocations DPD.

8.1.7 To inform and add to this technical work, local communities were consulted extensively at “Place Shaping” workshops (see Volume 3 of the Report of Consultation, Examination Document SUB6). For each town, large village and the wider countryside, attendees were asked a range of questions, including:

- How the needs of children and young people are being met and how these needs could be better accommodated;
- Whether there is a shortage of any key facilities or services within the area, and if so what and where these are; and
- If there is a need for more open space within the area, and if so, how and where this should be provided.

8.1.8 The results of these workshops helped inform development of the Place Strategies in section 20-26 of the Pre-Submission Core Strategy – and in particular the identification of key local objectives relating to leisure and open space issues, where these were highlighted as local issues (see response to Issue 12: question 12.5 regarding Tring).

8.1.9 The ability of sites to help deliver community benefits such as additional informal recreation space and sports pitches has been a key consideration the choice of local allocations and strategic sites and in the setting of development principles for these proposals.

8.1.10 The Council is committed to protecting open space. Policy CS23 states that *“existing social infrastructure will be protected unless appropriate alternative provision is made, or satisfactory evidence is provided to prove the facility is no longer viable.”*

8.1.11 This policy approach accords with paragraph 74 of the NPPF which specifies that existing open space, sports and recreational buildings and land, including playing fields, should not be built unless:

- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements;
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

**8.2 Is the Council’s approach to the provision of community facilities satisfactory? Will community needs be met? Policy CS23 refers to Zones being defined in the green belt for new schools facilities. How will this be achieved? School facilities will also be supported on Open Land, which is**

**defined as areas of open space over 1ha, protected from development. Is this approach justified?**

8.2.1 The Council's approach to the provision of community facilities is a broad continuation of the approach contained within the current Dacorum Borough Local Plan (Examination Document OT1). This is considered to remain sound and neither the technical work, nor Government policy, indicates the need to revise this strategy. The approach comprises a combination of site identification; support for initiatives of local communities; and protection of existing uses (see paragraph 8.1.10 above).

8.2.2 Issues and specific needs have been picked up through a combination of Place Shaping workshops (see Volume 3, Report of Consultation, Examination Document SUB6) and technical studies. These studies include a specific Social and Community Facilities Study (Examination Document SC1) and studies looking at leisure needs as referred to under question 8.1 above.

8.2.3 Policy CS23: Social Infrastructure has been assessed as part of the Sustainability Appraisal of the Core Strategy (Examination Document SUB3). This appraisal concluded that:

*"The provision of social infrastructure that provides service and facilities for the local community, as well as the protection of existing facilities, will help towards the achievement of many of the social objectives, particularly that for enhancing community identity and participation."* (para 6.5.4)

8.2.4 Key issues relating to social infrastructure raised by local residents and community groups through the Place Shaping workshops (see Volume 3 of the Report of Consultation: Examination Document SUB6) included:

**(a) Berkhamsted -**

The need for further community facilities, such as open space, youth facilities and community centres.

**(b) Bovingdon**

How to retain the young people within the village improve secondary school accessibility.

**(c) Countryside**

The need to retain key community services and facilities, such as buses, post offices and schools.

**(d) Kings Langley**

School capacity in the context of housing growth in the Three Rivers part of the village.

**(e) Markyate**

The need to improve community and health facilities in the village.

**(f) Tring**

Maintaining essential local community services and facilities like doctors and dentists, and increasing the provision of facilities for the elderly. The provision of a variety of affordable homes was recognised as a key issue..

**(g) Hemel Hempstead**

The need to strengthen connections between existing and new green spaces and to deliver more affordable homes.

8.2.5 Where appropriate, these issues have been highlighted in the relevant Place Strategy. Policy CS23 provides an appropriate framework to allow these community needs to be met.

8.2.6 Necessary land allocations will be made through the Site Allocations DPD, East Hemel Hempstead Area Action Plan, and associated site-specific master plans. There will almost certainly be the need for other provision across the lifetime of the plan that cannot be identified (and provided for) now. The role of the planning system is to create opportunities for this provision and then work with relevant authorities to enable delivery e.g. through the dual use of a school sports facility or the provision of a new doctors surgery.

8.2.7 There will be on-going dialogue with social infrastructure providers as part of the Infrastructure Delivery Plan (IDP) process – see response to Issue 17, question 17.1. As noted in the response to question 8.1, the Council cannot however guarantee that every community request and ambition will met, due to factors such as cost, land availability and other viability constraints.

8.2.8 Government policy requires authorities to plan positively for schools. Paragraph 72 of the National Planning Policy Framework (NPPF) (Examination Document REG15) states that:

*“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools; and work with schools promoters to identify and resolve key planning issues before applications are submitted.”*

8.2.9 Policy CS23 balances control of development with the flexibility to respond to proven educational needs.

8.2.10 Most school sites can be accommodated within urban areas. However, in some settlements demand will only be met through school sites within the Green Belt. This is due to the location of the catchment area and nature of existing sites within the urban area. In exceptional circumstances, where a departure from standard Green Belt policy is justified, a new school, or an extension to an existing school will therefore be supported. This will provide the local education authority with greater flexibility in the complex area of school planning.

8.2.11 The identification of the ‘Education Zones’ reflects close and recent working with

the County Council as to how best current identified demand can be met within existing school sites in the Green Belt. It responds to an identified growth in state school places highlighted by the local education authority. The Council's approach has received strong support from the local education authority, (Hertfordshire County Council).

8.2.12 Two Education Zones are currently identified for Berkhamsted. There are several factors which have contributed to the identification of these zones for the town. These include:

- A significant amount of change is expected to take place due to both increase demand for state school places and a restructuring of the system (moving from a 3 tier to 2 tier system, as within the rest of the Borough). There is the need for policy flexibility to be able to address this issue in a positive manner.
- At present there are no suitable sites available within the urban area accommodate relocated school facilities.
- The town is compact in nature with limited opportunities to develop a new school site within existing settlement boundaries.
- It is important that the Council provides sufficient school places in tandem with housing development and growth.
- The existing school sites within the town are constrained for a variety of reasons, making expansion difficult.

8.2.13 Specific development sites will be identified though the Site Allocations DPD and shown on the Proposals Map. The Council would not rule out further 'Education Zones' being identified through the Site Allocations process, provided there is clear evidence of need and if local circumstances justify this.

8.2.14 Extensions and development on sites within the Green Belt are subject to strict national and local planning controls. Any development within the Green Belt, including in the education zones or on major developed sites will be subject to normal planning considerations in terms of design, layout and access. (See response to Issue 13: question 13.2 regarding Kings Langley School).

8.2.15 Any new state schools within the Educations Zones would be delivered in the following way: -

- (a) Potential sites would be identified in the Site Allocations DPD (and shown on the Proposals Map);
- (b) The site would be purchased by the local education authority (if not already within their ownership) or they would negotiate appropriate control of the land; and
- (c) A planning application for a new school would be submitted to the County Council, with Dacorum Borough Council consulted as a statutory consultee. The planning application process would decide details of the scheme in terms of its design, spatial layout and other site specific details – although it is likely that many of these issues will have been raised in advance through informal pre-application discussions.

8.2.16 The Council's approach to Open Land reflects a longstanding policy that has

been tested at two previous local plan inquiries. As stated in paragraph 8.2.1 above, there is no technical evidence or national policy reason to change this approach.

8.2.17 Paragraph 116.2 of the Dacorum Borough Local Plan (Examination Document OT1) states that: -

*“Open land includes contiguous sites of 1 hectare or more used as leisure space, schools where the playing fields contribute to the urban structure or are in areas where there is a shortage of leisure space, woodland, nature conservation sites, lakes, allotments, churchyards, cemeteries, amenity land, walkways and the Grand Union Canal. No right of public access is implied by this definition.*

8.2.18 All open space is open land. The largest and most important areas of open land (i.e. greater than 1 ha in size) are shown on the Proposals Map. Whilst this includes some schools with playing fields, not all schools fall within open land. The designation only applies to those schools where the open land contributes to the character and function of the settlement. Open land designation does not imply public access. It is appropriate to allow some limited extension of buildings within open land as set out in Policy 116: Open Land in Town and Large Villages of the Dacorum Borough Local Plan. This policy is ‘saved’ until replaced through the Development Management DPD.

**8.3 Proposed minor change MC31 suggests that additions to the identified provision for community facilities “are possible”. Where and when will such additions be identified and why can they not be identified in the Core Strategy?**

8.3.1 Figure 14 of the Pre-Submission Core Strategy (Examination Document SUB1) (as updated by minor change MC32) sets out the range of services and facilities covered by the term ‘social infrastructure.’ This comprises:

- Early years education to further education;
- Primary and secondary healthcare;
- Community buildings and facilities for childcare, community care, general welfare, worship and social contact;
- Specialist facilities such as a prison;
- Job centre and related facilities;
- Cemeteries;
- Premises for emergency services and related facilities such as fire hydrants;
- Open space, outdoor leisure and indoor sports facilities;
- Libraries; and
- Buildings and facilities for culture, including arts and entertainments, and civic duties.

8.3.2 As explained in paragraph 8.2.6 above, there will almost certainly be the need for additional social infrastructure provision across the lifetime of the plan that is not

identified (and provided for) now. This is largely because the time period of the plan (up to 2031) exceeds the time periods over which providing agencies can accurately predict their needs. The role of the planning system is to create opportunities for this provision and then work with relevant authorities to enable delivery.

8.3.3 The extent of the list in Figure 14 is reflected in the wide range of agencies that are responsible for the delivery of community facilities. Whilst this list includes the Borough Council, it is not solely responsible for delivery. Rather it works in collaboration with other organisations.

8.3.4 Discussions with infrastructure providers have informed the current Infrastructure Delivery Plan (Examination Document ID5) and informed the standards set out in the Dacorum Strategic Infrastructure Study (Examination Document ID3) where appropriate. They have also helped to inform requirements set out within individual Place Strategies (section 20-26 of the Core Strategy: Examination Document SUB1)

8.3.5 Social infrastructure needs will be continue to be considered and identified within future updates to the IDP and where possible, detailed within the Site Allocation and DPD and/or East Hemel Hempstead Area Action Plan. They will also be highlighted through more detailed site-specific master plans i.e. those being prepared for the local allocations. Requirements have already been included within the published master plans for the two strategic sites (Examination Documents SS1 and SS2). Neighbourhood Plans will also have a role to play in identifying, and providing for, local needs.

8.3.6 Policy CS23: Social Infrastructure provides a robust framework for allocations and for local decisions. It has been worded to ensure that it supports the retention of existing facilities, ensures the provision of known future needs and can also support any future requirements that may arise – whether through physical provision of facilities or financial contributions. This is supported by Policy CS35: Infrastructure and Developer Contributions.