



AGENDA ITEM: 15

SUMMARY

Report for:	Cabinet
Date of meeting:	26 July 2011
PART:	I
If Part II, reason:	

Title of report:	LOCAL DEVELOPMENT CORE STRATEGY – PROPOSED SUBMISSION
Contact:	Stephen Holmes, Portfolio Holder for Strategic Planning and Regeneration Authors: Laura Wood – Team Leader – Strategic Planning (ext 2660) and James Doe – Assistant Director Planning Development and Regeneration (ext 2583)
Purpose of report:	That Cabinet: <ol style="list-style-type: none"> 1. Consider the key issues raised by the consultation held in late 2010 on the Draft Core Strategy and new information and advice. 2. Recommend the Core Strategy Proposed Submission documents to Full Council for publication and comment. 3. Support the principle of developing a Community Infrastructure Levy (CIL).
Recommendations	<ol style="list-style-type: none"> 1. To note the key issues arising from consultation on the Draft Core Strategy (November 2010) and new evidence. 2. To recommend to Council that housing option 2, incorporating the growth level and the local allocations set out in paragraph 1.37 of this report, are included within the Pre-Submission Core Strategy. 3. To delegate authority to the Portfolio Holder for Planning and Regeneration to approve changes to the Draft Core Strategy prior to consideration by Full Council. 4. To delegate authority to the Assistant Director (Planning, Development and Regeneration) to finalise the Report of Consultation and Sustainability Appraisal.

	<p>5. To recommend to Council that it approve the Core Strategy for publication, seeking representations in accordance with the Statement of Community Involvement and relevant Regulations.</p> <p>6. To recommend to Council to approve the following procedure for considering further issues on the Core Strategy:</p> <p>(a) If significant new issues are raised in the representations on forthcoming consultation routines, to report to Cabinet and Council for a decision as to whether any change to the Core Strategy is justified</p> <p>(b) If there are no significant new issues, to delegate authority to the Assistant Director (Planning, Development and Regeneration) to</p> <ul style="list-style-type: none"> - submit the Core Strategy for examination; and - in consultation with the Portfolio Holder to agree any minor changes to the Core Strategy to resolve objections and improve the clarity of the document. <p>7. To request the Assistant Director (Planning, Development and Regeneration) to prepare a Community Infrastructure Levy charging schedule for Council approval.</p> <p><i>[Council should note that Strategic Planning and Environment Overview and Scrutiny Committee considered the draft Core Strategy on 19 July 2011].</i></p>
Corporate objectives:	Preparation (and delivery) of the Local Development Framework and its component parts contributes to all the corporate objectives. The aim is to achieve high quality, sustainable development in the right place, at the right time and with the right infrastructure, whilst also ensuring recognising the need to protect green space.
Implications: Financial/ Value for Money	<p>The process of preparing the Core Strategy, as part of the LDF, has financial implications. Cabinet considered the implications of a three year budget programme when considering the Annual Monitoring Report and progress towards the Local Development Scheme in November 2009. Budget provision, together with an LDF reserve, is made for 2011/12.</p> <p>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. This process will be further improved and simplified through the adoption of a Community Infrastructure Levy (CIL) approach.</p>
Risk Implications	Key risks are identified in the Local Development Scheme and reviewed annually with the Annual Monitoring Report. They include failure of external agencies or consultants to deliver on

	<p>time, change in Government policy and team capacity. A separate risk assessment prepared for the Core Strategy Pre-Submission identifies a number of risks relating to the examination in public process and particularly the soundness tests with which the Core Strategy must comply. There are also risks associated with not delivering sustainable development i.e. in terms of not meeting local housing needs.</p>
<p>Equalities Implications</p>	<p>The issues covered by the Core Strategy include affordable housing and homes for minority groups, accessibility of facilities and local employment. The Sustainability Appraisal Report that accompanies the Core Strategy considers equalities issues. It concludes that no issues have been identified in relation to the Core Strategy potentially discriminating on the basis of disability, gender or ethnic minority.</p>
<p>Health and Safety Implications</p>	<p>Implications are included in the planning issues covered by the Core Strategy.</p>
<p>Monitoring Officer/S.151 Officer Comments</p>	<p>Monitoring Officer:</p> <p>The request for delegated powers to officers and the Portfolio Holder set out in the recommendation are intended to expedite the decision making process in relation to the formation of the Core Strategy and are in line with the relevant planning legislation and the Council's Constitution.</p> <p>Deputy S.151 Officer</p> <p>Paragraph 1.7 identifies potential significant time and resources implications in the event that the Council wishes to revise the document in the light of consultation results once it has been approved at Full Council. No attempt has been made to quantify these resource implications to date. An assessment will need to be made in the event that the Council chooses to ask for a revision of previous decisions.</p> <p>The Community Infrastructure Levy, if adopted, will change the profile of capital receipts currently available under Section 106 rules. The Council will need to agree appropriate governance arrangements regarding the management of the scheme and the allocation of CIL monies to specific projects. Applications for the use of CIL proceeds will have a bearing on the future availability of capital resources and will fall within the terms of the revised Capital Strategy approved by Cabinet on 24th May 2011.</p> <p>In agreeing the appropriate level of housing targets over the lifetime of the strategy the Council needs to have regard to the New Homes Bonus which will provide additional income to the Council while the scheme is in force. At present, the New Homes Bonus is available on all new homes built between 1st April 2010 and 31st March 2016. Adopting a lower growth target may result in New Homes Bonus forgone but the actual income due will depend on the growth targets being met (or exceeded) in terms of actual properties developed.</p>

	<p>Studies and research exercises for the development of sites for housing and business growth will have resource implications. Where these cannot be met from approved budgets a LDF reserve is available to support implementation of the Core Strategy. Applications to draw down this reserve will be required and submitted to Council for approval as proposals are brought forward.</p>
<p>Consultees:</p>	<p>The report refers to consultation undertaken at various stages. The results of all previous consultation is summarised in the Report of Consultation that will accompany the Pre-Submission Core Strategy. Volume 6 is a draft report of consultation from November 2010, including public consultation on the Consultation Draft Core Strategy. Development Plans Task & Finish Group has been consulted at regular intervals in the preparation of the Core Strategy. The Local Strategic Partnership Board has also discussed the content of the Core Strategy at key stages in its preparation. Corporate Management Team have been appraised of progress. It has expressed support for housing option 2.</p>
<p>Background papers:</p>	<ul style="list-style-type: none"> • Draft Core Strategy (November 2010) • Draft Core Strategy Report of Consultation (especially Volume 6). • The draft Pre-Submission Core Strategy. • Sustainability Appraisal report (November 2010) • Presentation given at Members Briefing (February 2011). • Report presented to the Local Strategic Partnership Board on the 'Dacorum Local Development Framework – Core Strategy' (June 2011). • Assessment of Strategic Sites and Local Allocations (October 2010) • Assessment of Alternative Growth Locations for Hemel Hempstead (May 2009) • Statement of Community Involvement (June 2006). • Draft National Planning Policy Framework (June 2011). • Draft proposals from DCLG regarding 'Presumption in Favour of Sustainable development' (June 2011). • Local Development (England) Regulations (2004 as amended) • Planning and Compulsory Purchase Act (2004 as amended). • Draft Localism Bill. • Planning Policy Statement 12: Local Spatial Planning. • Technical studies (available from www.dacorum.gov.uk).

BACKGROUND

1 Introduction to the Core Strategy

- 1.1 The purpose of the Core Strategy is to set the planning framework for the Borough up to 2031. Its aim is to achieve sustainable development i.e. new homes, facilities and businesses, whilst maintaining the quality of the environment. It is an essential tool in helping to co-ordinate new investment within the area and helping promote economic regeneration and growth. Infrastructure provision should be aligned with new development.
- 1.2 Once agreed, the Core Strategy, together with other planning documents that make up the 'Local Development Framework', will replace the current Dacorum Borough Local Plan, adopted in 2004.
- 1.3 The Core Strategy contains a vision of what the Borough should be like in 2031, together with a series of objectives which set out how this vision will be realised. Both the vision and objectives complement those set out within the Sustainable Community Strategy (January 2008). They are followed by planning policies that provide a framework through which the Council will judge future development proposals. These cover the plan's core themes of:
 - Strengthening Economic Prosperity
 - Providing Homes and Community Services; and
 - Looking After the Environment.
- 1.4 In addition to this Borough-wide framework, the Core Strategy also contains individual Place Strategies that look at the specific planning issues affecting our towns, large villages and the wider countryside. These set out how we intend to protect their different characters, build upon their strengths and, where possible, help address any problems they face. These Place Strategies provide a clear planning framework for any Neighbourhood Plans that communities may wish to draw up once the new Localism Bill is enacted. The important issues of infrastructure provision, delivery and monitoring are also addressed.

Where we are in the process

- 1.5 The Council is about to reach a critical stage in the Core Strategy development, known as Pre-Submission. This is where the Council publishes the version of the Core Strategy that it proposes to submit to the Planning Inspectorate and take forward to examination.
- 1.6 The Pre-Submission Core Strategy 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 Core Strategy has developed from a consideration of issues and options to the Pre-Submission version. The Pre-Submission Core Strategy, the Sustainability Appraisal Report and the Consultation Report are jointly referred to as the Proposed Submission documents.
- 1.7 Once endorsed by Full Council, the Pre-Submission Core Strategy becomes a material planning consideration and will be published for formal comment for a 6 week period. If the Council wishes to make any significant changes to the Pre-Submission version in the light of representations made during this period, it will need to repeat the Pre-Submission consultation before submitting the document to the Planning Inspectorate. This has significant time and resource implications.

- 1.8 The Core Strategy has been subject to a very rigorous process of evidence collection and testing, and consultation. It is a long term plan and decisions taken now should be robust for many years to come.
- 1.9 In revising the Consultation Draft and approving the Core Strategy, the Council must take into account:
- Technical evidence
 - Government and strategic policy (The East of England Plan is still relevant)
 - Sustainability appraisals (including strategic environmental assessment and Habitats Assessment)
 - Consultation
 - Government regulations.

New information and evidence

- 1.10 A number of new sources of information and evidence have arisen since Cabinet last considered the Core Strategy in September 2010.

Results of Public Consultation

- 1.11 Through previous consultation over several years we have already gained a good understanding of what local residents, organisations and businesses consider to be the main issues facing the Borough and the different options for tackling these. Consultation has taken different forms, some with the general public and some with targeted groups. Preparation of the technical evidence has also included consultation with stakeholders to verify accuracy and support recommendations.
- 1.12 The most recent consultation on the Draft Core Strategy during November / December 2010 generated over 2,600 comments from more than 600 different groups and individuals. Additional feedback was gained from a questionnaire circulated to the Council's Citizens' Panel (a cross section of about 1,000 residents) and from meetings with organisations to discuss specific issues.
- 1.13 Officers are currently finalising the Report of Consultation, which will provide a full summary of the consultation comments and the Council's response to issues raised. It will comprise seven volumes. Previously published volumes are being edited for ease of reading and clarity. Volume 6 relates to the current consultation and Volume 7 will provide an overview of the whole consultation process. The Report of Consultation will need to be amended to reflect decisions made regarding the Council's housing target, any new information that becomes available before Full Council, to ensure the information they contain is comprehensive and that responses to objections are accurate, consistent and robust. Once complete, the report will be available on the Council's website. Copies of the current draft documents are available in the Group Rooms.
- 1.14 The table in Appendix 1 provides a summary of the yes/no answers given to questions in each section of the Core Strategy. These are broken down to distinguish responses by the general public, organisations and landowners.
- 1.15 These high level results show that the approach to the environment and economy is generally supported. The principal issues of concern centre around the housing section and site information contained within some of the Place Strategies. A more detailed summary of the nature of these concerns and the significance of issues raised is set out in Appendix 1.

- 1.16 It is particularly important to note the impact of site-related campaigns when considering responses. These have often affected responses to other sections, such as the overall Borough Vision and objectives and the approach towards infrastructure and delivery.
- 1.17 Volume 6 (Annex A, Appendix 1) of the Report of Consultation sets out the Council's recommended response to issues raised through the consultation and any changes required to the Core Strategy. Additional changes are also required as a result of new information, changes in Council and Government policy and for consistency, clarity and accuracy. These additional changes are listed in Appendix 3. This schedule will be included in the final Report of Consultation.

New Government advice

- 1.18 The Government intends to replace Planning Policy Guidance (PPGs), Planning Policy Statements (PPSs) and other national guidance with a more succinct document called the 'National Planning Policy Framework' (NPPF). A draft version of the NPPF has been submitted to Ministers and there will be formal consultation later this year. Whilst the approach may change following initial feedback, the current draft takes a very pro-development stance. Key points include:
- A reiteration of the importance of a plan-led system and the need for every authority to have an up-to-date plan upon which to base planning decisions.
 - A move towards authorities being required not just to plan for local housing need, but also to reflect housing demand. This would require Councils to base housing targets on their Strategic Housing Market Assessments (SHMA) and latest household projections (see below).
 - The need for planning to play an important role in delivering economic growth and prosperity.
 - The retention of the 5 tests for development in the Green Belt currently in PPG2: Green Belts.
- 1.19 A 'presumption in favour of sustainable development' will underpin the NPPF. This is a key part of the Coalition Government's stated intention to reform the planning system so that it is more supportive of development. The draft presumption says that local planning authorities should "*plan positively for new development and approve all individual proposals where possible.*" It also requires Councils to "*grant permission where the plan is absent, silent, indeterminate or where relevant policies are out of date.*"
- 1.20 The Localism Bill is also due to be enacted later this year. This will introduce a new tier of 'Neighbourhood Plans' to the development plan system.
- 1.21 Sufficient flexibility must be built into the Core Strategy to enable it to reflect these (and future) changes to the planning system, whilst still providing a clear basis upon which planning decisions can be made.

New population and household growth information

- 1.22 The critical benchmark that will be used by a Planning Inspector to assess the Council's approach to housing is the household projection information from central Government (CLG). This is often referred to as the ONS projection. The most up-to-date ONS figures relate to 2008. The 2008 ONS projections were published in May

2010, so were not available to inform earlier drafts of the Core Strategy. Figures from the 2004 CLG household projections and Hertfordshire County Council's own internal work were used instead.

- 1.23 The results of these earlier projections are set out in the 'Population: Background Note for the Core Strategy' (April 2009). This document is currently being revised. We must also be aware of the latest projections from the East of England Forecasting Model (EEFM) which captures the interdependence of the economy, economic change and housing at a local level. Projections are also available using the Chelmer model, but these are considered less robust. This model is based on out of date assumptions and has been subject to criticism by experts. Officers do not consider that the Chelmer projections to be a realistic, reasonable or sound basis on which to base our housing target.
- 1.24 Results from these different household projections are shown in Appendix 2. The ONS projections indicate that over 13,400 new households will be formed within the Borough over the period covered by the Core Strategy (2006-2031).

Technical evidence

- 1.25 Additional technical information has become available, which needs to be reflected in the Core Strategy.
- 1.26 The Employment Study Update (June 2011) has confirmed Officer advice that the jobs target needs to be reduced. The new figure of 10,000 better reflects anticipated levels of housing growth, whilst still taking account of the sub-regional role of Maylands and the Council's aspirations for economic regeneration. The report has also helped clarify assumptions regarding uses in the Maylands Gateway and confirmed that business expansion into St Albans District will not be required within the plan period.
- 1.27 The Green Infrastructure Study (March 2011) and the outcomes of the Hemel Hempstead Town Centre workshop ("charette") held in January 2011 have also required amendments to the content of the Core Strategy. None of these changes have affected the main policy approach within the document.
- 1.28 Some technical work and information is still outstanding:
 - An update of retail capacity figures. The Council's latest retail study (March 2009) was based on high and low housing forecasts. These retail figures were amended by Officers for the Draft Core Strategy to better reflect actual planned levels of housing provision. The latest retail update, being carried out as part of work to support the Hemel Hempstead Town Centre Master Plan, will act as an independent check on these figures.
 - Discussions with St Albans regarding cross boundary issues and the content and scale of the East Hemel Hempstead Area Action Plan (AAP) are ongoing. At the request of St Albans Officers, the Council has suggested draft wording regarding the future planning framework for this area for inclusion in its Pre-Submission Core Strategy. This includes a suggested boundary for the AAP area. A final version of St Albans' Pre-Submission Core Strategy is not yet available and a planned meeting between senior Members and Officers has yet to take place. It is important to ensure the two authorities take a complementary approach to this area. Officers are trying to ensure that there is flexibility to include uses which would serve the Maylands Business Park and Spencers Park neighbourhood

within St Albans. Examples might include a new primary school, waste management facility, park and ride and a community sports facility. Further amendments to our Core Strategy (especially the Hemel Hempstead Place Strategy) may therefore be required.

- Consideration is also being given as to whether the Outdoor Facilities Study (October 2006) needs to be updated.
- 1.29 If available, this information will be reflected in the Pre-Submission Core Strategy that is put before Full Council. However, none of the outstanding work is considered to be critical enough to warrant delaying progression to Pre-Submission.
- 1.30 Since the Draft Core Strategy was written, progress has been taken to improve the way in which the Council collects developer contributions, through the adoption of a Supplementary Planning Document (SPD). This SPD is intended to be an interim measure before a more comprehensive tariff-based system is introduced through development of a Community Infrastructure Levy. Formal endorsement of the move towards CIL will enable the Pre-Submission Core Strategy to better reflect future approaches to collecting infrastructure contributions from new development. Whilst CIL cannot be put in place until after the Core Strategy has been found sound by a planning inspector, considerable work is required in the interim to draw up the charging schedule and put the necessary processes in place to enable it to come into effect once approved. Key advantages of CIL are:
- It will allow the Council to collect contributions towards infrastructure required as a result of the cumulative effects of development – the ability to do this via S106 will be greatly reduced.
 - It should allow the Council to raise more money towards the cost of infrastructure than would be case if we rely solely on S106.
 - It will allow the Council freedom to decide how to spend the contributions it receives.
 - Once it is in place it will be easier to administer than S106 agreements and should save Officers time.
- 1.31 In particular there are new rules which limit the pooling of s106 contributions which will not apply to CIL. Also the Council will not be able to seek s106 contributions by way of standard charges on developments (as it currently does through its new Developer Contributions Supplementary Planning Document) after 1st April 2014 or from the date it adopts CIL (whichever is sooner). In this regard the SPD provides an important stop-gap before CIL can be introduced. These legal changes underline the importance of moving to adopting CIL as soon as possible and before the April 2014 cut off point.

Setting a housing target

- 1.32 The key outstanding issue that needs to be resolved before progression to Pre-Submission is the housing target the Council wishes to set. The level we choose must still follow a set of national rules, be justified by strong evidence, reflect housing need, strengthen economic growth and be supported by adequate infrastructure. Government statements encourage growth – in terms of both recovery from the economic recession and the provision of housing.
- 1.33 The Government considers that financial incentives (through for example, the New Homes Bonus) will encourage local authorities to support new housing. The emphasis is upon accepting ‘sustainable development.’ If the Core Strategy is not

considered to have set a robust and justified housing target, then it will not be found 'sound' by the Planning Inspector following examination and work on developing a new strategy will have to begin again.

- 1.34 The Draft Core Strategy (November 2010) sought feedback on two different housing levels. Both cover the period from 2006-2031.
- 1.35 Option 1 aims to make the best use of land within defined settlements and is sometimes referred to as 'urban capacity.' It equates to a target of 370 dwellings/year or an overall housing programme of about 9,800 new units.
- 1.36 Option 2 adds to Option 1 through the inclusion of 'Local Allocations.' It equates to a target of 430 dwellings/year or an overall housing programme of about 11,300 (as at 1st April 2009). Option 2 was set at this level because it was considered to strike an appropriate balance between social, economic and environmental objectives. It represents a sustainable level of growth for the Borough, taking into account infrastructure thresholds and the ability of settlements to at least maintain their existing populations. It provides greater opportunities to provide local affordable housing.
- 1.37 The local allocations include in Option 2 are:

Settlement	Site	Estimated capacity
Hemel Hempstead	LA1 Marchmont Farm	300
	LA2 Old Town	80
	LA3 West Hemel Hempstead	up to 900
Berkhamsted	LA4 Hanburys, Shootersway	60
Tring	LA6 Icknield Way, West of Tring	150
Bovingdon	LA7 Land north of Chesham Road	up to 60

- 1.38 Feedback was also sought on another local allocation at land at Lock Field, New Road, Northchurch (LA5), but this site did not form part of Option 2 assumptions.

Consultation feedback

- 1.39 Of the two options put forward for consideration, the public consultation shows that opinion is divided, but on balance there was a preference for Option 1 (see Figure 1). This was primarily due to the opposition of local residents to any housing development within the Green Belt. Some people considered that an even lower target should be considered due to concerns over the capacity of local infrastructure and the impact that new development may have upon the character of towns and villages. The feedback from organisations, businesses and landowners who responded to this consultation was less clear cut. Many supported Option 2, or suggested that the Council should set an even higher target.
- 1.40 Many landowners and their representatives have put forward the argument that the Council should choose a target higher than Option 2. Their arguments include reference to the latest ONS household projections, including taking account of in-migration; the role of housing in supporting wider economic and regeneration objectives and local housing need; the need to seek a balance between homes and jobs and concerns that the current housing programme places too much emphasis upon the delivery of lots of small sites (both identified and those expected to come forward as windfall).

1.41 The overall number of representations received regarding this issue was relatively low.

Figure 1
Responses to question on housing target in Draft Core Strategy Consultation

	Option 1	Option 2	Neither	No clear answer
Key organisations	15	4	4	1
Individuals	23	13	36	0
Landowners	1	6	11	2
Total	39	23	51	3
				116

1.42 Landowners and their representatives have suggested additional locations for housing; these include:

- South Berkhamsted;
- Duckhall Farm (Bovingdon);
- Shendish and Nash Mills (Hemel Hempstead); and
- Dunsley Farm and land adjoining Longbridge Close, also referred to as Waterside Way (Tring).

1.43 If a housing target above Option 2 were selected, these would be possibilities. Officers have concluded that none of them offer superior choices to the local allocations in Option 2, for reasons primarily set out in the published 'Assessment of Local Allocations and Strategic Sites' (October 2010).

1.44 The Citizens Panel survey indicated a preference for the lower housing target, which is more in line with recent levels of housing development. Panel members appeared to be more swayed by concerns over the provision (or lack) of infrastructure and the desire to protect the countryside than other factors. The preference for the lower housing target should be seen in context.

1.45 Firstly, the majority of respondents agreed with the vision and objectives set out within the Draft Core Strategy. The vision for Hemel Hempstead says that the town will meet its own locally generated demand for new homes. Secondly, the 2009 Citizens Panel survey showed a majority in favour of higher place targets for Berkhamsted, Tring, Kings Langley and Bovingdon. The results of the recent consultation are however only one factor amongst many that must be taken into account when determining the Core Strategy and setting the Borough's housing target. It will not be enough for the Borough Council to agree lower housing levels just because of public opinion from the consultation. A range of other sources of information and evidence also need to be taken into account. This includes:

- a) Information about future growth in population and households.
- b) Evidence of housing need (through the Strategic Housing Market Assessment, housing register etc);
- c) Availability of land (as indicated through the Strategic Housing land Availability Assessment and subsequent update reports);
- d) What is happening in adjoining authorities i.e. what levels of new homes and jobs they are planning to deliver; and
- e) Other information and technical studies and results of independent Sustainability Appraisal work.

- 1.46 These issues were discussed in the report to the June 2011 Dacorum Partnership (Local Strategic Partnership) Board and further detailed information is set out in Appendix 2. Key points to note include:
- If the Council wishes to give more weight to one source of evidence / information than another, it must have clear and logical reasons for doing so. Otherwise it runs the risk of the Core Strategy being found 'unsound' by the Planning Inspector at Examination.
 - Work on the Council's Infrastructure Delivery Plan shows that neither of the housing options raise any significant issues that cannot be resolved through continued close working with infrastructure providers.
 - The Option 1 annual target would meet about 70% of the projected household demand identified by the latest figures from the latest ONS projections and the Option 2 target about 80%.
 - The Sustainability Appraisal Report (November 2010) indicates that no significant sustainability issues are raised by either housing Option 1 or 2. For comparison, the appraisal also tested a higher level of growth (Option 3), which equated to about 12,500 dwellings (2006-2031) or 500 dwellings per year. At this level of growth the appraisal identified that there would be a significant adverse effect upon the local landscape. This would be much worse if 13,400 dwellings were provided (in accordance with the latest ONS household projections). It is the view of Officers that the original conclusions of the Sustainability Report would be unchanged.
 - Consultation on the Core Strategy has highlighted a strong local desire to protect the Green Belt within the Borough. It is however important to note that Green Belt is a planning policy tool aimed at helping manage the level and type of development in areas of high development pressure. It is not an indicator of landscape quality. Government guidance requires Green belt boundaries to be reviewed regularly when preparing a new local plan. The areas of greatest landscape quality within the Borough fall within the Chilterns Area of Outstanding Natural Beauty (AONB). Neither Option 1 nor Option 2 involve the development of any land within the Chilterns AONB. The draft NPPF would expect the Green Belt boundary to be reviewed only when preparing a new local plan.
 - Delivering the Option 2 housing level lends greater support to local regeneration and employment objectives and provides a better balance between homes and jobs. The Consultation Draft Core Strategy had a jobs target of 18,000 (based on earlier Regional Plan housing targets) and was out of balance. This better relationship between homes and jobs will need to be reflected in the Pre-Submission Core Strategy text.
- 1.47 Government policy towards delivery of housing and how this is expressed in local plans has been emerging over the past few months. This is taking on an increasingly pro-development stance, with strong encouragements to local planning authorities to have robust and sustainable plans in place. Government has indicated that in the absence of such plans, the default position will be to grant planning permission for developments that comply with the National Planning Policy Framework. On this basis, it is important that the Core Strategy puts forward a level of growth that is based on meeting housing needs – which from the available evidence is high – whilst seeking to protect the high environmental quality of the Borough.

- 1.48 In the light of the above evidence and information, Members are recommended to include housing Option 2 in the Pre-Submission Core Strategy. Housing Option 2 equates to approximately 11,385 dwellings and includes Proposals LA1-4, LA6 and LA7. The Option 2 target of 430 dwellings per year is an indication and because of Government rules on windfall sites will probably be exceeded slightly. The target is not however open-ended, a point which should be made in the Core Strategy.

The role of Local Allocations

- 1.49 Local allocations are relatively modest extensions to some of our towns and large villages. They will help maintain existing populations, meet local housing needs and local infrastructure. They are focused upon meeting specific local needs and the future vision for that particular place. They have been chosen following detailed site assessments, which looked at issues such as accessibility, the capacity of local infrastructure, the impact on the Green Belt and compatibility with sustainability objectives. The choice of sites also reflects the results of previous public consultation. Several of the proposed sites were considered by the Inspector at the last Local Plan Inquiry.
- 1.50 If selected, local allocations would be defined in a separate planning document, the Site Allocations Development Plan Document (DPD), which forms part of the Local Development Framework. Matters such as design, layout and potential benefits worked through with the local community when the Site Allocations DPD is produced.
- 1.51 Local allocations provide some flexibility in the housing land supply. Whilst Hemel Hempstead will be the focus for growth due to the regeneration agenda, local allocations would help ensure that further opportunities for new housing are also provided elsewhere in the Borough. Their development would be carefully phased, and until required they would be managed as countryside (i.e. as Green Belt or Rural Area). Policies in the Core Strategy would control this.
- 1.52 Our land supply information currently indicates that local allocations are only required under housing option 2, though even under Option 1 policies CS2 and CS3 (which relate to the selection and management of development sites) would provide flexibility.
- 1.53 A two stage approach will be taken to the definition of local allocations:
- (a) *Local Allocations defined within the Core Strategy*
- 1.54 This is the approach set out in the Draft Core Strategy (November 2011). Local allocations are shown as symbols on the relevant vision diagrams in the place strategies. This sets a long-term framework for the scale and location of new development. It provides clarity for both the public and landowners and will also help with longer term infrastructure planning. It also provides clarity that other land that has been under pressure for release from the Green Belt will remain in the Green Belt e.g. those sites listed in paragraph 1.42.
- 1.55 Textual changes are required to the Core Strategy, to reflect changes required as a result of the last consultation, take account of new information and for general editorial reasons.
- (b) *Detail and phasing of Local Allocations set out in the Site Allocations DPD*

- 1.56 The precise boundary of the Local Allocations will be defined in the Site Allocations Development Plan Document (DPD), together with their detailed planning requirements. It is at this stage that necessary changes to the Green Belt boundary will be made.
- 1.57 In order to deliver homes in a sustainable manner, the priority is to development previously developed land and urban sites as far as possible. Some Green Belt land will be needed as part of the 20 year supply of land in the remainder of the Plan period, but it is important that this land comes forward only when needed. A mechanism for phased release is important not only for this reason but to ensure the appropriate phasing of new infrastructure. Existing text in Policy CS3 referring to the potential early release of Green Belt allocations can be removed in response to concerns expressed through the public consultation. In this way, Policy in the Core Strategy will be adjusted to ensure there is a sound mechanism for the release of the Local Allocations when they are needed. In addition, the Site Allocations DPD will contain a more detailed policy that sets out detailed phasing.
- 1.58 The approach as drafted in the Core Strategy would allow the Council and local community to add local allocations *if* they so wished (through a Neighbourhood Plan and/or Site Allocations document) and it was justified. This approach will ensure the plan is sufficiently flexible to reflect changes in both local circumstances and national planning policies. The inclusion of local allocations in the Core Strategy would accord with Government advice that key decisions should be taken within the Core Strategy.
- 1.59 If further local allocations were to be required at Hemel Hempstead, evidence points towards land to the north east of Hemel Hempstead, which is currently within St Albans district. Any plans for development in this area will not be possible without the agreement of, and joint working with, St Albans Council.

Next steps

- 1.60 Changes need to be made to the Consultation Draft Core Strategy (November 2010) as a result of consultation, new evidence, emerging Government guidance and for general editorial reasons. Cabinet is asked to approve changes arising from the Report of Consultation (Volume 6) and other changes currently listed in a separate schedule (Appendix 3). There will be consequential changes to the current Local Plan's Proposals Map.
- 1.61 The main consultation responses have been discussed with the Council's sustainability consultants. They have confirmed verbally that the changes suggested by Officers to the Core Strategy are not expected to give rise to any significant sustainability implications. The Sustainability Appraisal Report (November 2010) will be updated following Cabinet and be available in final form for consideration by Full Council.
- 1.62 In order for these changes to be made in the available timescales, it is recommended that the Planning and Regeneration Portfolio Holder is given delegated authority to agree the final version of the Pre-Submission Core Strategy that is put before Full Council. It is also recommended that the Assistant Director for Planning, Development and Regeneration is given delegated responsibility to make necessary changes to the Consultation Report and Sustainability Appraisal Report for the same reasons. Subject to these changes Officers recommend that the Core Strategy be approved and published.

- 1.63 All three Proposed Submission documents will be available for consideration at Full Council. Drafts of the documents are available in the Group Rooms.
- 1.64 Provided it is endorsed by Full Council, the Core Strategy will be published for comment for 6 weeks from mid October. Arrangements for this representations stage are governed by the Planning Inspectorate (PINS) and national regulations.
- 1.65 PINS prescribes how we must word the form that accompanies the Proposed Submission documents and in order to be considered, representations must relate to issues of soundness. Late comments cannot be accepted at Pre-Submission stage. Although paper forms will be available, use of the Council's online consultation portal will be encouraged.
- 1.66 Due to the formal nature of the Proposed Submission stage it is not proposed to hold any public consultation events, such as drop-in sessions or staffed exhibitions. This accords with consultation arrangements set out in the Council's adopted Statement of Community Involvement (SCI). Further advice and information regarding both strategy and process will of course be provided to individuals and organisations as appropriate.
- 1.67 It is recommended that Cabinet agrees the next stages in the process that will 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 Core Strategy. If significant new objections are raised, these will be reported to Cabinet and Full Council. If no significant new issues are raised, Cabinet / Full Council are asked to delegate authority to the Assistant Director (Planning, Development and Regeneration) to submit the Core Strategy for examination and, in consultation with the Planning and Regeneration Portfolio Holder, agree minor changes to the Core Strategy to resolve objections and improve clarity. At this stage, the prospect of significant new issues should be low. It is normal to allow this degree of flexibility to enable smooth running of the examination process.
- 1.68 If the Inspector considers that no immediate soundness issues arise he/she will proceed to Examination. Following receipt of the Inspector's Report Cabinet and Full Council will consider its findings. It is hoped that the final Core Strategy can be adopted by the Council in late 2012 or early 2013.

Appendix 1

Consultation Draft Core Strategy – summary of consultation responses

Note:

The following is an extract from chapter 3 of draft Volume 6 of the Report of Consultation.

General Public Consultation

3.1 617 organisations, individuals and organisations submitted comments to the questions asked. 2,668 comments were made (i.e. total number of answers to the questions). Charts A and B show how the responses were distributed across the questions. Questions relating to the Borough Vision, housing target and Berkhamsted generated more than 100 responses each. However, some questions generated a relatively low response: questions relating to Tring, the large villages and the delivery chapters attracted 35 or fewer responses each.

3.2 The results of the general public consultation have been set out in a consistent way in Annex A, Appendix 1. Under each question, the total number of comments was recorded, together with the numbers answering 'yes' and answering 'no'. In the case of alternative housing targets, preferences were recorded. The responses were summarised, and the reply and principal action [to be] taken by the Council listed. This reply was provided in a summarised form, rather than in a 'line by line' analysis of lots very detailed comments.

3.3 A quantitative analysis of the answers is given in Table 1, split into themes and places. A negative response usually entailed an objection on a particular point or points, and not to the whole section. In addition, support was sometimes given with a relatively minor proviso (ref Annex A, Appendix 1).

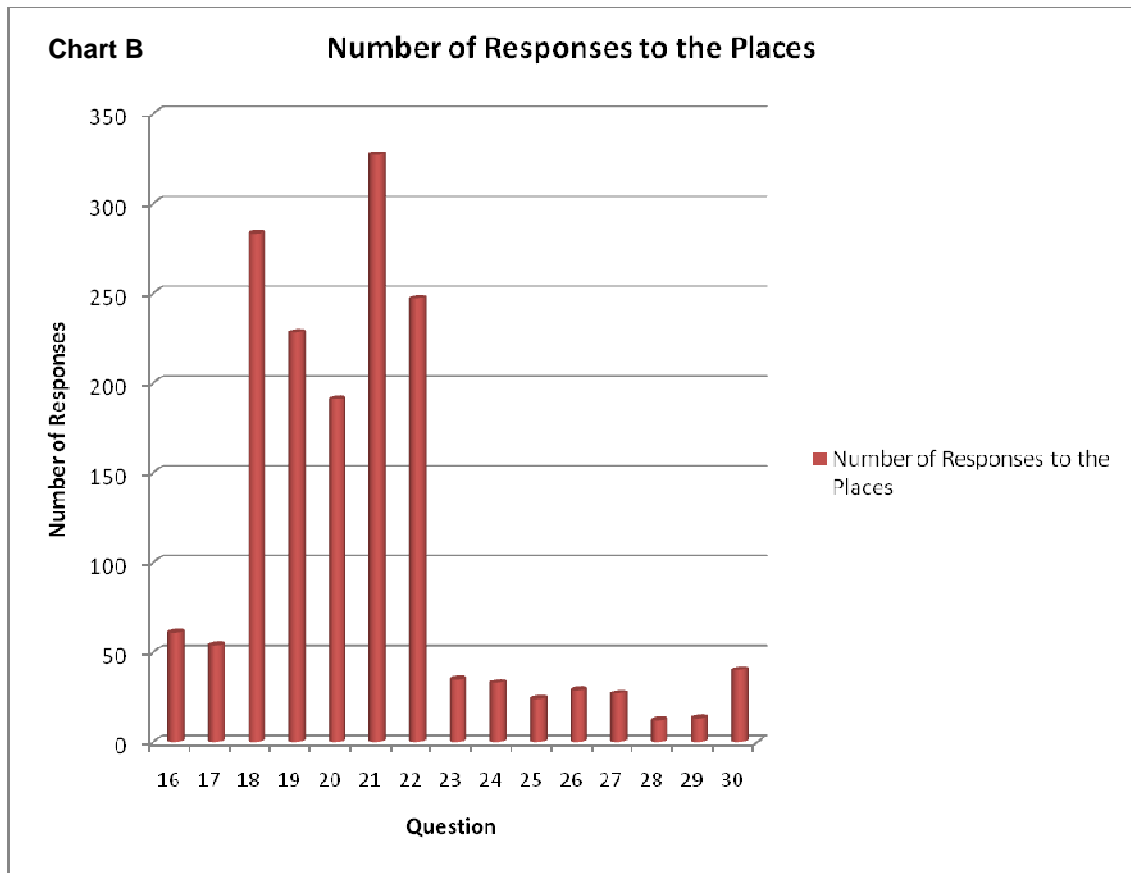
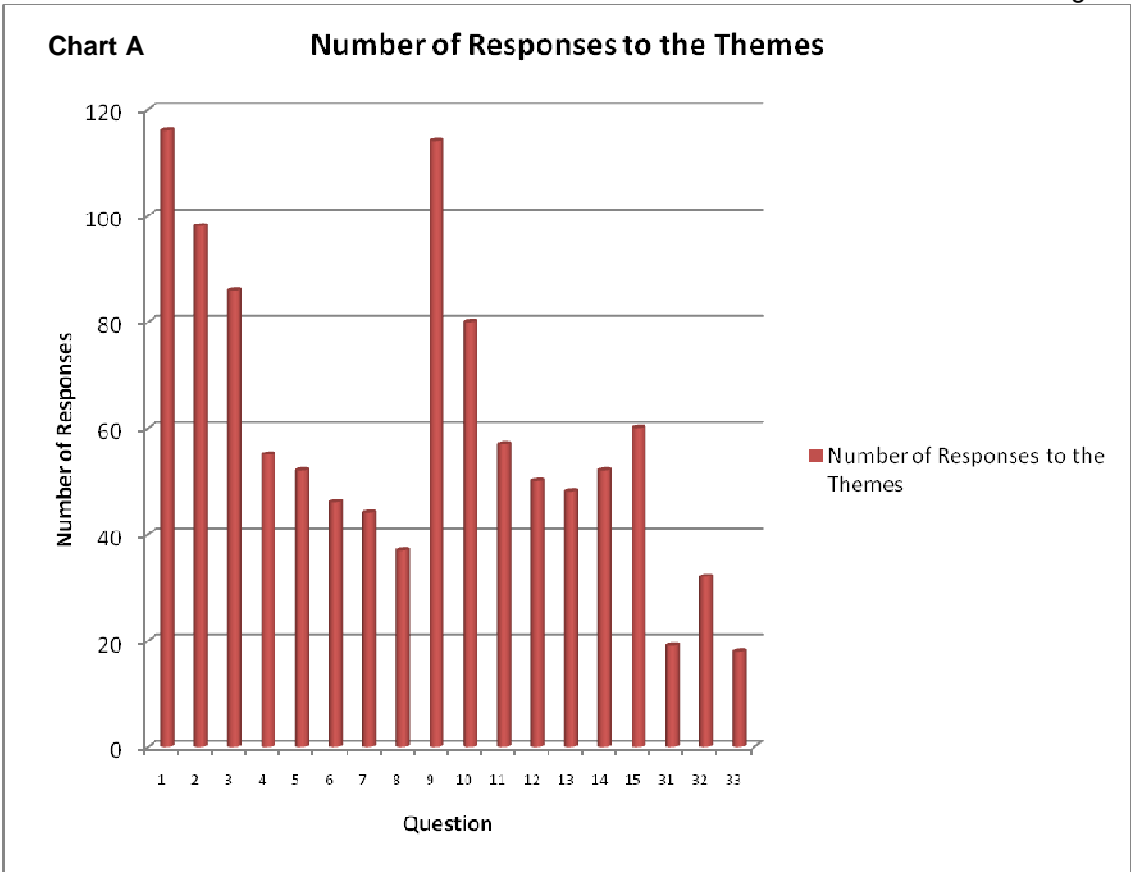
Themes

3.4 The majority of organisations who commented supported the vision, aims and themes. Landowners gave similar support, except on the level of housing and where there were impacts on specific land interests. It was the number of individuals commenting that normally altered the balance between support and opposition for a particular section of the strategy.

3.5 The majority who commented supported the sections, Supporting the Economy and Protecting the Environment; the strategic objectives; and Part C, Implementation and Delivery: chapters on access and design in the Sustainable Development Strategy were also well supported (Questions 2, 4-8, 12-14 and 31-33).

3.6 This meant there were more objections (than general support) for the Borough Vision; the chapter, Promoting Sustainable Development; and the section, Providing Homes and Community Services (Questions 1, 3, and 9-11).

3.7 The Borough Vision only received more 'no's from individuals. However they did not normally oppose the vision itself, rather they opposed matters of detail which appeared elsewhere in the draft Core Strategy. Some questioned the delivery of the vision. Landowners raising objections felt more housing was required to meet locally generated demands.



3.8 The objections to Promoting Sustainable Development concentrated on housing. Most individuals objected to proposed growth in the market towns, particularly Berkhamsted. The draft Core Strategy was considered to be too skewed towards housing to be sustainable. The biggest concern reiterated by landowners was that there would be insufficient housing to meet natural population growth, accommodate in-migration and/or support business growth. A handful of individuals also felt there would be insufficient housing.

3.9 The above comments were repeated in response to questions on the housing target and provision of new homes. There was clearly a range of opinion from those supporting the housing target, Option 1 or less, to those supporting Option 2 or higher.

- Key organisations favoured Option 1 because it would protect the Green Belt and rural area.
- More individuals favoured neither option, and often felt Option 1 was too high. They cited reasons such as overdevelopment, overcrowding, loss of character, loss of countryside/Green Belt/greenfield land and insufficient or inadequate infrastructure.
- 28% of Individuals supported Option 2 for two key reasons. More affordable housing would be provided. The option would offer a suitable balance between building homes and protecting the environment (i.e. building homes to meet needs, with only a modest incursion into the Green Belt).
- The majority of landowners opted for neither option, and felt that Option 2 was too low. There was insufficient evidence to support either Option 1 or Option 2: both would deliver less housing than the nil-net migration figure would suggest. This would be detrimental to the economic well being of the Borough. Such low targets would reduce the provision of affordable housing. There would be a poor relationship between the level of housing proposed and anticipated jobs growth.

On the provision of new homes generally, organisations questioned the uncertainty of population projections on which housing targets were based and the different affordable housing thresholds between Hemel Hempstead and Berkhamsted. Some individuals opposed the provision of pitches for Gypsies and travellers. Concerns were also raised about infrastructure provision and incursion into the Green Belt. On the other hand some individuals felt that more affordable housing was needed. Landowners disagreed because the housing target should be increased in line with projections of natural growth. Almost all landowners commented about affordable housing levels. The consensus was that a flexible approach must be taken to ensure that development would not become unviable. There was further disagreement about the inclusion of windfall sites in housing figures. Landowners also questioned whether the phasing of allocated sites was desirable or necessary.

3.10 Only individuals disagreed overall with the chapter on Meeting Community Needs. They disagreed for many different reasons, no one reason being given more than once.

Table 1: Analysis of Yes/No Comments

Subject	Question Number	YES				NO			
		Org	Ind	Land	Total	Org	Ind	Land	Total
Themes									
Borough Vision	1	14	26	9	49	9	45	9	63
Strategic Objectives	2	16	28	8	52	8	29	8	45
Promoting Sustainable Development	3	10	21	7	38	6	27	13	46
Enabling Convenient Access	4	9	19	6	34	2	18	1	21
Securing Quality Design	5	42	20	5	67	4	8	0	12
Strengthening Economic Prosperity	6	9	15	6	30	1	4	2	7
Providing for Offices, etc	7	9	13	3	25	2	6	5	13
Supporting Retailing and Commerce	8	5	14	2	21	5	5	3	13
Housing Target : Option 1 – 370 units p.a.	9	15	23	1	39				
Option 2 - 430 units p.a.		4	23	6	33				
Neither		1	36	11	48				
Providing Homes	10	9	11	4	24	11	25	15	51
Meeting Community Needs	11	8	10	4	22	8	21	2	31
Enhancing the Natural Environment	12	8	21	4	33	3	13	1	17
Conserving the Historic Environment	13	10	26	4	40	1	2	0	3
Using Resources Efficiently	14	9	14	1	24	8	8	6	22
Delivery	31	6	2	0	8	2	6	0	8
Infrastructure	32	6	8	1	15	4	9	2	13
Monitoring	33	3	6	1	10	1	3	0	4

Subject	Question Number	YES				NO			
		Org	Ind	Land	Total	Org	Ind	Land	Total
Places									
Common Local Objectives	15	8	13	4	25	4	23	3	30
Hemel Hempstead – Local Allocations	16	1	11	3	14	9	28	5	42
Hemel Hempstead – Strategy	17	8	9	6	23	7	11	10	28
Berkhamsted – Strategic Site (SS1)	18	1	6	1	8	3	267	1	271
Berkhamsted – Local Allocation (Hanburys)	19	1	12	0	13	3	209	2	214
Berkhamsted – British Film Institute	20	2	65	1	68	0	109	0	109
Berkhamsted – Local Allocation (Northchurch)	21	0	22	1	23	8	293	1	302
Berkhamsted – Strategy	22	4	11	2	17	4	223	1	228
Tring – Local Allocation	23	0	13	1	14	7	10	8	25
Tring – Strategy	24	3	8	0	11	7	12	3	22
Kings Langley – Place Strategy	25	5	10	0	15	1	3	1	5
Bovingdon – Local Allocation	26	1	5	1	7	2	13	5	20
Bovingdon – Place Strategy	27	4	7	1	12	0	9	3	12
Markyate – Strategic Site	28	1	2	0	3	0	6	1	7
Markyate – Place Strategy	29	1	3	0	4	2	3	2	7
Countryside - Place Strategy	30	6	11	0	17	4	14	0	18

3.11 Other issues raised included the following:

- Individuals would like to see reference to the Green Belt in the strategic objectives.
- Landowners questioned the relationship between housing and employment objectives, suggesting that they do not support each other.
- The jobs and office floorspace targets were considered to be too high, not clearly justified and out of balance with housing targets.
- St Albans City & District Council was concerned at the amount of new retail floorspace identified in Policy CS16 for Hemel Hempstead, because it could have a negative impact on St Albans City Centre and Harpenden Town Centre. They requested an impact assessment of the proposed growth on the centres in St Albans District.
- Adult Care Services (Hertfordshire County Council) was concerned that insufficient provision is made in the plan for various services and facilities.
- Individuals and key organisations were concerned that wind turbines can be considered appropriate in the Chilterns Area of Outstanding Natural Beauty.
- The Core Strategy lacked policies on the water cycle/water infrastructure.
- Hertfordshire County Council (Environment) said that issues identified with capacity at Maple Lodge Waste Water Treatment Works must be resolved.

Places

3.12 The majority who commented opposed development locations and the place strategies, except Kings Langley and Bovingdon. The common local objectives were opposed, although there were relatively few comments on the objectives themselves: most individuals repeated concerns about housing growth and the adequacy of infrastructure. Opposition to place strategies invariably related to a potential development option or local allocation, but there were other varied, specific points as well.

3.13 The three local allocations at Hemel Hempstead were opposed, partly for their impact on the Green Belt and relationship with existing settlements, Piccotts End, the Old Town, Potten End and Bourne End. Other reasons why LA1 (Marchmont Farm) was opposed covered traffic generation, potential crime, loss of view and lack of transport connections. The proposed allocation, LA2, attracted concerns about the effect on the quaint and tranquil feel of the Old Town, removal of a green gateway, loss of amenity space, increased traffic and the impact on the historic nature of the High Street. Development at West Hemel Hempstead (LA3) was said to affect the Chilterns Area of Outstanding Natural Beauty and local character: there were also concerns about traffic generation, partly due to its location away from major local employment site, and the ambitious nature of the scheme. Reasons for opposing the strategy were varied. A key issue however was the achievement of cross-boundary co-operation with St Albans Council to deliver the East Hemel Hempstead vision.

3.14 Questions about Berkhamsted generated the highest response, a large part of which was co-ordinated by a 'Save our Berkhamsted' campaign and stemmed from specific concerns about the proposal for land at Shootersway/Egerton-Rothesay School (Strategic Site SS1). Reasons given for objecting to this proposal included the

number of homes planned for the site, the effect on the character of the area, the transport implications in terms of safety and added car use/traffic congestion, the location of the development in relation to services, and infrastructure and utilities being insufficient to support the development. The local allocation at Hanburys, off Shootersway (LA4), which would involve Green Belt land, was similarly opposed. Key organisations supported investment in and expansion of the British Film Institute next to Hanburys. Many individuals were also in support, provided there was no enabling housing development. The majority of individuals however were concerned about the effect on the Green Belt, and did not want the Council to offer any financial support to the British Film Institute. Local allocation LA5 (New Road, Northchurch) attracted the highest level of adverse comment. Organisations and most individuals were opposed. Most opposition was in respect of the completion of a link road, which development could help fund, rather than the local allocation. The link road proposal was considered to be unsafe, costly and environmentally disruptive: it would shift problems from one area to another potentially creating more traffic in the process. New housing should only be developed if needed in its own right. There were also concerns about the impact on the Chilterns Area of Outstanding Beauty and the adequacy of local infrastructure. Opposition to the Place Strategy was directly related to opposition to the local allocations. Organisations commented that the strategy did not contain sufficient emphasis on retaining the town's character. They also thought that greater priority should be given to raising the quality of existing facilities and infrastructure.

3.15 The local allocation west of Tring (LA6) was supported by the majority of individuals, but not others because of the perceived impact on the Chilterns Area of Outstanding Natural Beauty and the Green Belt. Landowners disagreed because they thought LA6 should comprise more homes or because they considered other sites to be more suitable for development. The site was considered by some to be isolated. The Tring Place Strategy was opposed largely because of the concern over the level and location of new development. Some organisations, such as Tring Sports Forum, supported plans for additional playing fields at Tring, but individuals opposed this. They said that Tring had large areas of underutilised sporting facilities and that Green Belt should not be used for this purpose.

3.16 The location allocation north of Chesham Road, Bovingdon (LA7) was opposed by individuals because they felt the village could not handle any more development. Landowners thought that an alternative local allocation would be better. However Bovingdon Parish Council concluded that LA7 was appropriate to meet long term needs in the village.

3.17 Few responses were received about Markyate. However a key concern was that some felt Hicks Road (Strategic Site 2) did not need any retail or industrial uses and that the focus of planning should be the High Street. There would be impacts on parking, drainage, sewerage and school capacity, and the housing numbers were too high. The Highways Agency expressed reservations about the potential traffic implications arising from development in Markyate.

3.18 On further examination, the countryside strategy itself was largely supported. The concern related to any of the currently designated Green Belt or countryside being used for housing. The objective of protecting the countryside was seen to be contradicted by proposals to release Green Belt land for housing.

Late Comments

3.19 Some comments were received late, i.e. between January and March 2011. They were assessed to see if there were any new issues which merited a change to the Core Strategy. The comments were excluded from the schedule which summarises the general public consultation (at Annex A, Appendix 1).

3.20 The comments were submitted by:

1. Residents opposing new housing next to the Old Town, Hemel Hempstead (179 comments)

Their full argument was more relevant to a larger area of land (10 hectares) that had been included in the earlier consultation about growth at Hemel Hempstead (reported in Volume 2). However, the smaller area (2 hectares proposed in the Consultation Draft) was also of concern. This land slopes, is open, though little used, and is next to a conservation area.

2. Hertfordshire Local Access Forum

The Forum provided a standard response, the basic principles of which are accepted and already incorporated within the framework provided by the Core Strategy.

3. English Heritage

English Heritage supported the vision, strategic objectives and approach to design, meeting community needs, enhancing the natural environment and conserving the historic environment. It requested archaeological assessments on potential development sites and expressed concern about the potential impact of development adjoining the Old Town. It also provided other, detailed comments. Some led to changes in the Core Strategy (see Table 1).

Table 1: Core Strategy Changes – English Heritage Comments

Ref.	Comment	Change
CS10	Landmark buildings may be tall, but equally may be distinctive due to design and location.	Define 'landmark building' in a footnote.
Para 18.1	Delete reference to 'scheduled archaeological sites' because they are ancient monuments	Amend to 'areas of archaeological significance'.
Berkhamsted	Amend Vision to refer to the castle being protected and enjoyed.	Amend vision and strategy accordingly.
Berkhamsted	Seek a supportive link between The Rex cinema and the British Film Institute: this would justify expansion of BFI within its own site.	Amend strategy to refer to links being fostered between BFI and the town

Appendix 2

Issues to consider when setting a housing target

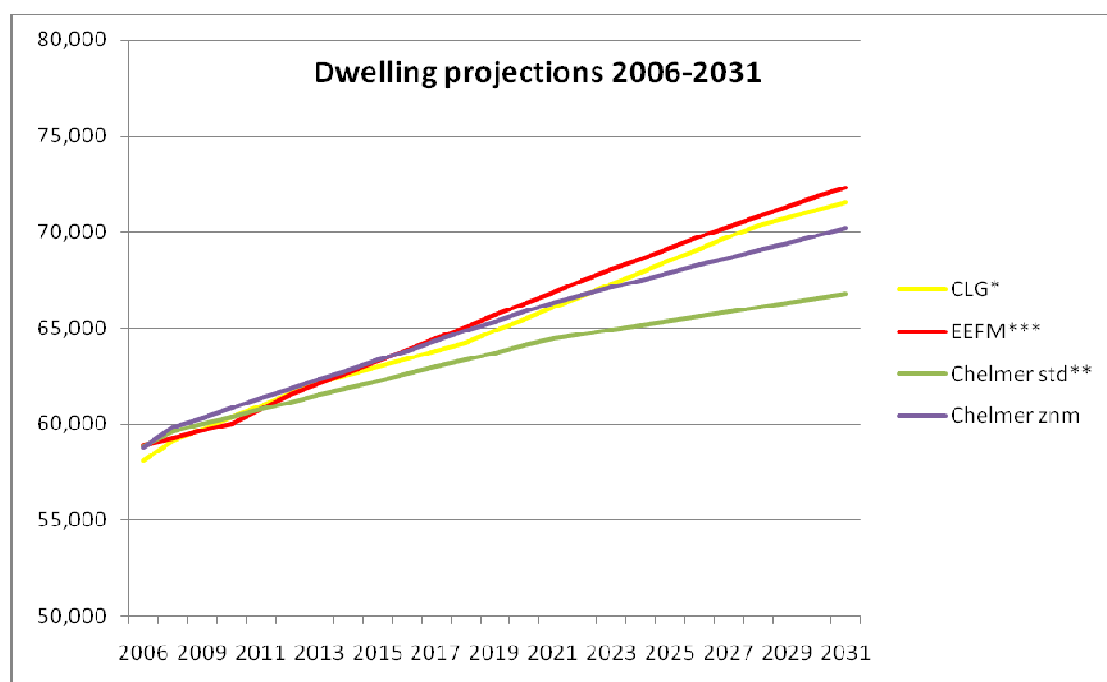
a) Information about future growth in population and households

The critical benchmark that will be used by a Planning Inspector to assess the Council’s housing target is the household projection information from central Government (CLG). This is often referred to as the ONS projection. The most up-to-date ONS figures relate to 2008. The 2008 ONS projections were published in May 2010, so not available to inform earlier drafts of the Core Strategy. Figures from the 2004 CLG household projections and Hertfordshire County Council’s own internal work were used instead. The results of these earlier projections are set out in the ‘Population: Background Note for the Core Strategy’ (April 2009). This document is currently being revised. We must also be aware of the latest projections from the East of England Forecasting Model (EEFM) which captures the interdependence of the economy, economic change and housing at a local level. Projections are also available using the Chelmer model, but these are considered less robust: these model runs are based on out of date assumptions and have been subject to criticism by experts. Results from these different household projections are shown in Figure 1.

Figure 1 - Results of Different Household Projections (2006-2031)

	2006	2009	2011	2016	2021	2026	2031	2006-2031
CLG	58,112	59,743	60,966	63,413	66,064	69,122	71,569	13,457
EEFM 2010	58,881	59,673	60,752	63,837	66,856	69,728	72,334	13,453
Chelmer std	58,831	59,993	60,768	62,603	64,439	65,611	66,784	7,953
Chelmer znm	58,799	60,313	61,322	63,826	66,329	68,262	70,194	11,395

Notes: ONS projections are those published by CLG.
HCC do not produce dwelling projections.



Newer projections from the Chelmer model were received after this report was first drafted. These projections suggest the following increase in households (2006-2031):

- Standard (baseline) projection: 11,828
- Zero net migration projection: 14,215.

b) Evidence of housing need

There are over 5,600 people currently on the Council's housing waiting list. Whilst this may include an element of 'double counting' caused by people expressing an interest in different types of homes, it indicates a very high level of local housing need. Adjoining authorities also have high levels of need. It is estimated that Option 1 would provide about 2,700 new affordable homes between 2006-2031. This figure would rise to about 3,300 under Option 2.

c) Availability of land

The Council's Strategic Housing Land Availability Assessment, and recent updates provided through Housing Land Availability papers, give a picture of potential housing sites within the Borough. This technical work indicates that there are sites within the boundaries of existing towns and large villages to accommodate approximately 9,670 new homes (2006-2031). This figure is constrained by both policy assumptions about density, parking provision etc and local land supply. About 1,200 of these homes have already been built (as at 1st April 2009). The Council would not be able to justify setting a housing target that was lower than what it can reasonably expect to be built over the plan period. The technical work also shows that there is land available to develop an even higher number of homes than suggested in Option 2, should the Council decide to release further greenfield sites or reallocate more employment land to housing.

d) What is happening in adjoining authorities

In the past an under-provision of new homes in one part of the County was compensated for by higher rates of development elsewhere within Hertfordshire. Whilst not all authorities have agreed their housing targets, it is becoming clear that this redistribution of dwelling provision is no longer taking place and that all of the authorities that adjoin Dacorum are likely to provide fewer new homes than they are predicted to need in the future. As Figure 3 indicates, Stevenage Borough Council's Core Strategy proposed a significant level of housing growth, which would have provided an additional pool of new homes within Hertfordshire. This Core Strategy has however recently been found 'unsound' by a Planning Inspector following the examination in public. This decision was largely due to the fact that the majority of housing provision assumed within Stevenage's plan would need to be accommodated within the adjoining district, who no longer supported the proposals. The planned level of new homes will therefore not be provided and Stevenage will have to begin work on an amended Core Strategy with a considerably lower housing figure. Aylesbury Vale's Core Strategy had proposed a similarly high level of housing provision, but the Council has withdrawn its plans following recent announcements regarding the removal of regional housing targets. It is important to note that none of the other authorities listed in the table have yet been through the formal examination process.

Figure 3
Planned levels of housing provision compared to latest Government household projections

Local Authority	Level of under/over-provision of new homes
Dacorum Borough Council	-4,413 (Option 1) -2,913 (Option 2)
Three Rivers	-8,490
St Albans	-10,566
Watford	-4,325
Chiltern	-4,357
Stevenage	+13,694 (found unsound)
Aylesbury Vale	Not known
Luton / Central Bedfordshire	+6,571

Notes:

- Information is based on 2008 CLG/ONS household projections.
- Figures relate to the 25 year period between 2008 and 2033, broken down to provide an average annual figure
- To translate household growth figures into actual dwelling requirements an additional 1.96% has been added to reflect recent vacancy rates and allow for natural movement in the housing market.
- Figures relate to housing targets contained in most recent published version of each authority's Core Strategy.

(c) Other information and evidence

The following table shows the level of new funding that is estimated would be released by the two housing options. This money could be used to support infrastructure and community facilities, or to increase the amount of affordable housing provided within the Borough.

	Option 1	Option 2
Money for infrastructure:		
(a) Developer contributions	£53.8 million	£66.2million
(b) New Homes Bonus	£7.0 million	£8.6 million

Note: Estimated figures based on information available in October 2010.

Annex 3

Schedule of Proposed Changes to Core Strategy not arising as a result of public consultation.

Notes:

- *This schedule will need to be updated to reflect decisions on the Council's housing target and the approach to Local Allocations*
- *Changes arising as a direct result of consultation responses are included in Volume 6 of the Draft Report of Consultation.*

			REFERENCE	CHANGE	REASON
GENERAL AMENDMENTS					
<ul style="list-style-type: none"> • Delete "how we have got to this point" text. • Delete questions • Update all document references as appropriate • Update references to groups / organisations where these have changed • Update text referring to Draft Core Strategy with references to Pre-Submission document. 					For general updating and clarity and to reflect move from Draft Core Strategy to Pre-Submission stage.
CONTENTS					
	1.	Introduction to the Consultation		Update introduction	To reflect move to pre-submission stage.
	2.	Summary of the Strategy		Update summary of strategy.	To reflect changes made to theme chapters particularly regarding the housing target, jobs target and references to employment floorspace and developer contributions..
			Key diagram	Replace 'Flaunden' label with 'Flamstead'	To correct mapping error.
PART A - CONTEXT					
	3.	Introduction	Figure 1	Update diagram	To reflect imminent introduction of Neighbourhood Plan tier.

			Figure 2	Update	To reflect progression to pre-submission stage.
			Para 3.3	Reference to East Hemel Hempstead Area Action Plan boundary.	Amend if decision on location of boundary in St Albans area has been taken by St Albans Council.
			Para 3.4	Refer to neighbourhood plans.	The Government has stated that neighbourhood plans will become part of the planning system.
4.	Borough Portrait			Update factual information	If more recent data is available.
5.	Challenges		Challenge 3	Delete reference to Performing Arts Venue and refer more generally to improved social and leisure facilities.	To reflect changes to Hemel Hempstead Place Strategy.
6.	Borough Vision				
7.	Strategic Objectives				
8.	Other Plans		Figure 7	Add reference to the RSS and include footnote to explain its future status.	For clarity in the light of recent High Court judgements.
			Figure 7	Add reference to other relevant docs including: <ul style="list-style-type: none"> • Dacorum Delivery Programme • Local Enterprise Partnerships • Local Investment Plan 	For completeness.

			Para 8.2	Add reference to the fact that the SCS is under review but core objectives will remain.	For clarity.
PART B – THE STRATEGY					
The Sustainable Development Strategy	9.	Promoting sustainable development	Para 9.5	Update reference to Sustainability Advice Note	To reflect latest available information.
		The distribution of development			
		The location and management of development	Policies CS2 and CS3 and paras 9.13 – 9.16	Update / add to text explaining the approach towards the selection and management of housing sites and the treatment of local allocations.	If required for clarity and to reflect Council decisions on housing target and local allocations.
		The Towns and Large Villages			
		The Countryside	Para 9.34	Simplify definition of the term ‘affordable’ by deleting reference to different housing categories.	To ensure consistency regarding terminology throughout the plan. The housing section will include the full definition.
	10.	Enabling convenient access between homes, jobs and facilities	Policy CS8	Delete word ‘maximum’ in clause (f) with regard to car parking standards.	To reflect changes to PPG13 and ensure policy remains accurate if the existing approach is amended through the Development Management DPD or other guidance.
	11.	Securing quality design	Monitoring indicator for Policies CS10-12	Amend monitoring indicators to refer to sustainability statement assessments rather than Buildings for Life Assessments.	To update/amend references to new guidance and methodologies.
Policy CS10			Define ‘landmark building’ in	To respond to advice from	

				a footnote.	English Heritage - landmark buildings are not necessarily defined by their height, but by their distinctiveness due to design and location.
				Delete "identified from items (f) and (g)	In the light of advice from Development Management
			Para 11.2 and Figures 11 and 13	Minor changes	Re-presentation following discussion with Development Management
			Paras 11.12-11.14	Minor changes	For clarity and to future-proof the document
			Policy CS11	Amend criteria to refer to positive streetscapes and links, co-ordination of streetscape design and avoidance of large areas dominated by car parking	Re-presentation and additional criterion following discussion with Development Management
			Policy CS12	Minor amendments to criteria	For clarity following discussion with Development Management
			Policy CS13	Minor amendments.	For clarity and accuracy
			Monitoring indicator for Policy CS13	Amend monitoring indicators to refer to sustainability statement assessments rather than Buildings for Life Assessments.	To update/amend references to new guidance and methodologies.
Strengthening Economic Prosperity	12.	Creating jobs and full employment	Para 12.2	Replace paragraph with new information.	To reflect new advice from Roger Tym & Partners in the Dacorum Employment Land Update 2011
			Para 12.3	Insert new paragraph to explain that the forecast growth in jobs numbers is an	To reflect advice from Roger Tym & Partners in the Dacorum Employment Land

			estimate.	Update 2011. The Council cannot physically create jobs through planning policy, so it is more appropriate for to refer to a jobs growth estimate rather than a true target. This figure will then be accompanied by policies that should enable jobs growth to occur at the planned level.
		Para 12.4	Remove 'relatively high' in reference to jobs forecast.	To reflect the significant decrease in the jobs forecast in the Dacorum Employment Land Update from the previous forecast of 18,000 jobs.
		Para 12.6	Replace reference to the 'Hemel 2020 vision' with reference to the 'Council's regeneration plans'.	In anticipation of the Council's plans to merge the Hemel 2020 projects into the broader Dacorum Development Programme (DDP). This is the new document that outlines the Council's regeneration plans.
		Para 12.7	Remove 'high jobs target and...' from 3 rd sentence.	This reflects the fact that the updated jobs target is lower than the previous target.
			Update technical figures.	To reflect latest study information.
		A low carbon economy		
		The Maylands Business Park		
		Supporting tourism		
		Economic Development	Policy CS14	Replace jobs growth target of 18,000 from 2006-2031 To reflect advice in the Dacorum Employment Land

				with jobs growth estimate of 10,000. Include statement that sufficient land will be allocated to accommodate this.	Update 2011 (Roger Tym & Partners).
			Monitoring of Policy CS14	Remove 2 nd indicator	To reflect likely inaccuracies of information and its limited usefulness.
			Delivery of approach to Strengthening Economic Prosperity	Amend last delivery mechanism to make more general.	To allow for flexibility with use of LDOs.
13.	Providing for offices, industry, storage and distribution				
	Offices	Para 13.5		Change office jobs forecast from 12,400 to 7,000 and update source accordingly.	To reflect advice in the Dacorum Employment Land Update 2011 (Roger Tym & Partners).
		Para 13.7		Remove reference to amount of office floorspace that will be provided in the Maylands Gateway.	To allow for flexibility in the East Hemel Hempstead AAP.
		Para 13.8		Change wording to state that Masterplan will identify the most appropriate location for offices in Hemel Hempstead Town Centre, rather than identify an office quarter.	Allow for flexibility. The Town Centre Masterplan will establish whether a single location or multiple locations for offices will be identified.
		Para 13.8		Change wording in last sentence to remove reference to office quarter.	
		Para 13.9		Remove last sentence.	The principle is already covered by Policy CS15.
		Industry, storage and distribution	Para 13.3		Revise job and floorspace forecast figures.

					Partners).
		Offices, Research, Industry, Storage and Distribution	Policy CS 15	Revise floorspace targets for additional office and industry, storage and distribution floorspace.	To reflect advice in the Dacorum Employment Land Update 2011 (Roger Tym & Partners).
			Delivery mechanisms	Remove reference to Hertfordshire Forward and Hertfordshire Works.	These organisations have or will shortly be subsumed by the Local Enterprise Partnership.
				Replace Hemel 2020 Vision with reference to Dacorum Development Programme (DDP).	In anticipation of the Council's plans to supersede the Hemel 2020 vision through the Dacorum Development Programme.
	14.	Supporting retailing and commerce	Policy CS16	Review retail capacity figures in the light of new information.	The results of the latest retail study update are due in August 2011. Depending on the outcome of this work the figures in the table within Policy CS16 may need to be amended. The policy thrust will not be amended.
		The retail hierarchy			
		Shopping areas			
		Out of centre retail development			
Providing Homes and Community Services	15.	Providing homes	General	Update references to housing options and make other consequential changes.	To reflect decisions on the housing target. These changes will need to be applied throughout the housing chapter and in other relevant sections of the plan.
			General	Update to refer to the latest and forthcoming technical work.	To reflect progress on the evidence base.

		Housing programme	Paras 15.10-15.23	Amend text in the light of decisions on the housing target; the approach to local allocations and latest household growth projections. The text should also clarify that the housing target should not be interpreted as an open ended figure.	To reflect decisions regarding the housing target and any local allocations and latest household projection information.
			Policy CS17	Update text.	To reflect decisions regarding the housing target and any local allocations.
			Table 7	Update housing programme and ensure the base date of information is clearly stated.	For clarity and to reflect decisions regarding housing targets and any decisions regarding capacity of Strategic Sites.
		Housing mix	Paras. 15.24-15.26, Table 9 and Policy CS18.	Update reference to the SHMA in the light of the future work on a local needs housing survey and rolling forward the Council's Housing Strategy and deletion of Table 9 relating to projected size mix of new homes.	Following discussion with Group Manager Strategic Housing and the content of the forthcoming Affordable Housing Supplementary Planning Document and Local Housing Needs Survey.
			New paragraph	Insert new paragraph to refer explicitly to the accommodation needs of the elderly.	To ensure the plan acknowledges the needs of the ageing population and reflects the latest advice from Herts County Council.

		Affordable housing	Policy CS19 and supporting text	Amend policy to update reference to the SHMA in the light of the future work on a local housing needs survey and in rolling forward the Council's Housing Strategy, to reflect changes in the definition of affordable housing at national level and to reorder the priority of criteria (a)-(d). The policy approach will remain unchanged.	To respond to advice from the Group Manager Strategic Housing and Development Management. These changes are required to reflect amendments to PPS3 relating to affordable rent category, to improve presentation and clarity of policies, to strengthen requirements, to cross reference to the Planning Obligations SPD and to simplify reference to social and affordable rent.
			Policy CS20	Amend policy to refer to selected <u>small</u> villages and to clarify the policy relates to affordable homes.	
		Travelling communities			
	16.	Meeting community needs			
		Delivering community services and facilities			
	Delivering leisure and cultural facilities	Para 16.23	Delete specific reference to a performing arts venue.	To reflect changes to the Hemel Hempstead Place Strategy.	
Looking after the Environment	17.	Enhancing the natural environment			The editing in this chapter also helps to link landscape, green infrastructure and biodiversity together.
		Protecting and Improving the Landscape	Para 17. 5 and 17.6 Map 2	Editing and reference to commons. Additional information to better reflect the scarp and	For clarity and to respond to changes resulting from 'Dacorum's Green Infrastructure Plan'. See

				dip slope topography in Dacorum.	below.
		Green Infrastructure	Paras 17.9 – 17.13	Editing and reference to key recommendations in 'Dacorum's Green Infrastructure Plan'.	To take account of new evidence - Dacorum's Green Infrastructure Plan – and ensure consistency of approach.
			Map 3	Include additional information and present the high level green infrastructure network as a diagram like Map 2.	
			Policy CS26	Reword to reflect the recommendations of 'Dacorum's Green Infrastructure Plan'.	
		Biodiversity and Geological Conservation	Paras 17.14 and 17.15	Editing and to recognise that geological sites may be added to the list.	For clarity and to ensure consistency of approach. Advice from the Herts Biological Records Centre indicates this is currently under investigation.
	18.	Conserving the historic environment	Para 1.8.1	Delete reference to 'scheduled archaeological sites' and amend to 'areas of archaeological significance. Include reference to landscape.	To respond to advice from English Heritage and the Council's Conservation Officer.
			Paras 18.2-18.5	Express the social and environmental benefits and the significance of historic heritage more positively.	To respond to advise from the Council's Conservation Officer.

				<p>Emphasise the importance of high quality building design and maintenance.</p> <p>Include reference to the heritage at risk review and how the Council takes positive action to protect vulnerable heritage assets.</p>	
			Policy CS7	Emphasise the need to conserve heritage assets and the positive contribution of new development.	
19.	Using resources efficiently	Para 19.11		Add additional text to explain the broad principles behind the energy hierarchy in Figure 16.	For clarity.
		Para 19.34		Insert additional wording to reflect how waste water and sewerage network upgrades will be progressed with adjoining authorities and stakeholders.	To give the most up-to-date position regarding discussions with the Water Cycle Study Steering Group regarding cross-boundary working.
	Renewable energy	Table 11		Amend and update requirements within Table relating to the level of carbon emission reductions in different areas of the borough and for different scales of development.	The approach set out in Table 11 in the Draft Core Strategy has been tested and refined following development of the Council's online carbon monitoring system (C-Plan). The revised requirements follow the same principles as set out in the original table but have been amended for the

					<p>following reasons:</p> <ul style="list-style-type: none"> • To refer to the 2010 rather than 2006 Buildings Regulations as the benchmark figure; • Potential changes to Code for Sustainable Homes; • To reflect current Local Plan definitions relating to what constitutes large and small scale development; • To make requirements for small scale development less onerous and to focus efforts to achieve carbon emission reductions on larger scale developments to reflect viability considerations.
		Sustainable design and construction	Policy CS28	Delete first two paragraphs of policy and replace with requirement that new development will be expected to (a) deliver carbon emission reductions as set out in table 11; and (b) maximise the energy efficiency performance of	To simplify and clarify the policy and reflect changes made to Table 11.

				the building fabric in accordance with the energy hierarchy set out in Figure 16.	
			Policy CS29	Amend criteria (g) to delete reference to the replacement of trees lost through development.	Criteria duplicates requirements of Policy CS12.
				Insert reference to role of Sustainability Statements	For clarity and to link with online Sustainability Statement requirements.
				Delete reference to Lifetime Homes	The principle of building adaptations is already included in the policy and Lifetime Homes are part of the sustainability statements, although the specific standards may change over time.
			Policy CS30	Add reference to the off-set funding being used for broader habitat improvements in criteria (c) and to water improvements. Revise title of policy to refer to its broader scope.	To add greater flexibility to the policy and reflect emerging national policy on biodiversity off-setting.
		Sustainable resource management	Policy CS32	Add word 'Quality' to end of policy.	For clarity regarding its content.
Place Strategies	20.	Introduction			
			End of Section	Insert new text to refer to neighbourhood plans and village/parish plans.	To ensure that these types of plan, which may be prepared, are seen in the context of place strategies.
	21.	Hemel Hempstead	Context	Update.	
			Visions	Update and make stronger	For accuracy and clarity, and

				reference to open space and public transport. Take account of further work on the town centre and Maylands, including the Town Centre Charette.	to reflect the Council's latest thinking.
			Local Objectives	Re-present. Adjust dwelling targets for East Hemel Hempstead by 100 (up) and the town centre by 100 (down).	For clarity. To reflect latest assumptions for dwelling capacity.
			Delivering the Vision: Town	Update. Make stronger reference to open space and transport, and areas outside the town centre and Maylands.	For accuracy and clarity.
			Delivering the Vision: Town Centre	Take account of further work on the town centre, including the Town Centre Charette.	For accuracy and clarity, and to reflect the Council's latest thinking.
			Delivering the Vision: East Hemel	Take account of further work on Maylands, including the discussions with St Albans Council.	For accuracy and clarity, and to reflect the Council's latest thinking. The need for land in St Albans district for development has significantly reduced.
			Policy CS33	Take account of further work on the town centre, including the Town Centre Charette. Refer to new homes, an evening economy along Waterhouse Street, better east west links and restoration of the Water Gardens.	For accuracy and clarity, and to reflect the Council's latest thinking.
			Policy CS34	Take account of further work	For accuracy and clarity, and

				on Maylands, including discussions with St Albans Council.	to reflect the Council's latest thinking.
			Monitoring	Simplify the list of business partners and refer to transport providers.	Update for accuracy.
			Figures	Take account of further work on the town centre and Maylands, including the Town Centre Charette. Adjust boundaries to ensure consistency throughout. Extend the Marlowes Shopping Zone. Extend the Maylands Gateway area. Amend the suggested boundary of the Action Area. Amend to accord with conclusions on green infrastructure (section 17). Update built vision diagram to reflect new/proposed developments at Nash Mills and the Manor Estate.	For accuracy, clarity and consistency, and to reflect more recent evidence and Council thinking.
22.	Berkhamsted	Vision and Strategy text	Para 22.11	Amend Vision to refer to the castle being protected and enjoyed. Likewise insert a new paragraph in the strategy. Amend strategy to refer to links being fostered between British Film Institute and the town	To respond to advice from English Heritage.
23.	Tring				
24.	Kings Langley				

	25.	Bovingdon			
	26.	Markyate	Proposal SS2	Amend site area and housing capacity to take account of the availability of two additional parcels of land adjoining the site that could reasonably be included within the proposal/master plan.	To respond to separate representations from an adjoining landowner whose land abuts the proposal site. Following discussions with the Development Management team.
	27.	Countryside	Para 9.34	Link the definition of affordable housing to Policy CS19: Affordable Housing.	For consistency.
PART C – IMPLEMENTATION AND DELIVERY					
	28.	Delivery			
		Partnership working			
		Key projects			
		Flexibility and contingency			
	29.	Infrastructure requirements	Para 29.3	Amend to clarify that the IDP is the result of technical work, rather than being the technical work itself.	For clarity.
			Paras 29.4-5	Editorial amendments.	For clarity.
			Para 29.6	Add sentence stating that most strategic and local infrastructure requirements are set out in IDP. Also, add in sentence to acknowledge role of neighbourhood plans with regards to infrastructure requirements.	For clarity and to update the chapter in light of emerging government guidance re neighbourhood planning.

		Developer contributions	Para 29.7	Add sentence to acknowledge that contributions will be used to mitigate the impacts of development.	Clarify that contributions are not sought to remedy existing deficits.
			Para 29.8	Replace 'tariff or other measures' with CIL. Remove reference to pooled contributions and clarify how CIL and S106 will be used.	Clarify the Council's approach to collecting developer contributions in light of the Coalition governments' announcements regarding their intentions for CIL and S106.
			Para 29.9-10	Replace paragraphs with one which refers to CIL rather than the Planning Obligations SPD.	Allow for flexibility re. the Planning Obligations SPD and confirm commitment to CIL.
			Para 29.11	Amend to introduce flexibility about how the Council will respond where viability is a concern.	Partly because the amount of CIL payable will not be variable, and partly to introduce flexibility into the Council's approach to dealing with viability.
			Policy CS35	Remove last two paragraphs, but include reference to the use of financial contributions.	Most of the last two paragraphs are more suitable for background text, where the sentiments are already expressed, rather than policy. The last sentence is no longer necessary given the government's clarification of the CIL regulations. It is however important to indicate that the use of

					financial contributions will be guided by the Infrastructure Delivery Plan.
	30.	Monitoring			
PART D – APPENDICES					
		Appendix 1			
		Appendix 2	Housing trajectory	Insert once decision on housing target is made	Trajectory information is required at the Pre-Submission stage.
		Appendix 3	Delivery mechanisms	Update as a consequence of changes to the main document.	For consistency and completeness.
		Appendix 4	Glossary	Include new terms as appropriate	Updating and clarity.

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