



CORE STRATEGY
REPORT OF REPRESENTATIONS
PART 2

Contains:

- **Annex B: Results**
 - **List of Respondents**
 - **Number of Representations**
 - **Main Issues Raised and Council's Response**
 - **Suggested changes to Main Modifications**

MAIN MODIFICATIONS

April 2013

This publication is **Part 2 of the Report of Representations for the Main Modifications to the Pre-Submission Core Strategy**: it contains the results of the consultation on the Main Modifications to the Pre-Submission Core Strategy, together with the responses to the question regarding the impact of the Regional Strategy revocation.

Part 1 of the Report of Representations contains the Main Report and Annex A, which has details of the notification process.

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Table 1 –List of Groups / Individuals from whom Representations were received

Notes:

- Includes both including supporting and objecting comments.
- List does not include names of individuals / groups who commented on the Minor Modifications only

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
317602	Mrs Anabel Condon				
735000	Mr Alan Barker		168772	Mr Graeme Free	Planner DLA Town Planning Ltd
489024	Mr Stephen Proudfoot				
607431	Mrs Kate Harwood	Palnning & Conservation Officer Hertfordshire Gardens Trust			
488516	mr hugh siegle				
488984	Mr Nicholas Jones				
741178	Mrs Jenny Jenkins				
741214	Mr Colin Lillicrap				
477976	Mr Nigel Smith	Stevenage Borough Council			
741939	Mr Nic Baxter				
610662	Mr Antony Harbidge	Chairman Berkhamsted Residents Action Group (BRAG)			
741960	Mrs. Anne Davies				
741992	Mr Duncan Brown				
737184	Mr Tim Noden	Planning Manager Harrow Estates			
742055	Mrs Janet Proudfoot				
742176	MR Richard Edwards				
742209	Mr. Steve Melligan	The Crown Estate	210968	Ms Helena Deaville	AMEC
742248	Ms. Jenny Volp	Highways Agency			
494332	mr edwin cuthbert				
224301	Mr Ian Burrus				
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Managing Director Boyer Planning
211062		Banner Homes Limited	618743	Mr Les West	Flitcroft House Icen Projects Ltd
742534	Ms Juliet Miller				
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Partner Woolf Bond Planning
688623	Natasha Smith	Planning Advisor Environment Agency			
221859	Mr Nick Hanling				
328864	Mr Danny Bonnett				
498429	Steve Baker	CPRE - The Hertfordshire Society			

502733	Mr Andy Barton	Forward Plans Manager Aylesbury Vale District Council			
742865	Mrs. J L Hawke				
742786	Mr. Michael Sheldon		740153	Mr James Holmes	Brian Barber Associates
742812	mr Kevin Smith				
485861	Mr Cornelius Nicoll				
742306		Gleeson Developments Limited	742857	Mr. Bob Sellwood	
742793	Mr Lawrence Sutton				
742892	Mr Chris Briggs	Spatial Planning Manager St Albans City and District Council			
211055	Mr Matthew Wood	Senior Planning Officer Hertfordshire County Council			
743006	Mr. Matthew Leach	Aviva Investors	743004	Mr. Tim Price	Savills
743039		Hilstone Property Investments Ltd	211002	Mr Paul O'Neil	Associate Partner Metropolis PD LLP
494011	Mr Alan O'Neill				
628226	Barratts North London		743125	Mr. Luke Cadman	Rapleys LLP
743135	Mr. Mike Kember	Bovingdon Parish Council	502742	Mr Jake Collinge	JCPC
627374		Brightman & Ball	627371	Mr Andrew Wilkins	Lone Start Land Ltd
224451	Mr Kelvin Clayson				
502697		Waterside Way Sustainable Planning Ltd	210986	Mr Stephen Harris	Senior Consultant Emery Planning Partnership
743270	Mr Patrick Beynon				
496443		Grand Union Investments	305509	Ms Jane Barnett	
591371					
211544	Mr Jake Quintin Leith				
620274	Mrs Maureen Goulbourne				
620494	Mrs Jeanette Corfield				
689450	Mr Neil Richardson	Space & Property Manager West Herts Hospital Trust			
494131	Mr Michael Emett	Strategic Land Director CALA Homes	743732	Mr Simon Prescott	Barton Willmore
502861		The Garden Centre Group	304753	Mr Mike Cole	Gregory Gray Associates

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501501	Mr Manpreet Kanda	St Albans City & District Council			
490800		Crest Nicholson	490519	Miss Nicola Broderick	NMB Planning Ltd
743858		Whiteacre Ltd	398719	Ms Jo Emmett	Hives Planning
742162	Ms Carol Hyland	Principal Planner - Policy Welwyn Hatfield Borough Council			
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd
743826	Mrs. Laura Horner	Natural England			
217807	Mrs Claire Crouchley	Parish Clerk Wigginton Parish Council			
224172	MR LES MOSCO				
744755	Mr Neville Watts	Crown Management UK Limited			

Table 2 – Number of Representations Considered

(a) Main Modifications										
Core Strategy Reference	Number of Representations									
	Total received	Total in support	Total objecting	Objections						commenting
				saying the core strategy is						
				<i>not legally compliant</i>	<i>not justified</i>	<i>not effective</i>	<i>inconsistent with national policy</i>	<i>Positively Prepared</i>		
Main Modification										
MM1	7	3	4	3	3	3	3	3	4	
MM2	16	2	14	7	12	12	9	11	15	
MM3	16	1	15	7	12	9	7	9	16	
MM4	8	3	5	3	3	3	4	3	5	
MM5	4	1	3	2	2	2	2	2	3	
MM6	4	3	1	0	0	0	0	0	1	
MM7	2	0	2	0	0	0	0	0	2	
MM8	1	0	1	0	0	0	0	0	1	
MM9	2	1	1	0	0	0	0	0	1	
MM10	2	1	1	0	0	1	1	0	1	
MM11	1	1	0	0	0	0	0	0	0	
MM12	9	2	7	2	5	5	4	4	7	
MM13	10	3	7	2	5	5	4	4	7	
MM14	6	2	4	3	3	3	3	3	4	
MM15	4	1	3	1	1	1	2	1	3	
MM16	3	2	1	0	1	1	0	0	1	
MM17	2	1	1	0	0	0	0	0	1	

MM18	4	2	2	0	0	0	1	0	2
MM19	2	1	1	1	0	0	1	1	1
MM20	1	0	1	0	0	0	0	0	1
MM21	3	1	2	0	0	1	0	0	2
MM22	0	0	0	0	0	0	0	0	0
MM23	0	0	0	0	0	0	0	0	0
MM24	1	0	1	0	0	0	0	1	1
MM25	1	1	0	0	0	0	0	0	0
MM26	0	0	0	0	0	0	0	0	0
MM27	1	1	0	0	0	1	0	0	0
MM28	23	2	21	11	18	16	17	15	20
General Comment	1	0	0	0	0	0	0	0	0
TOTAL	141	35	98	42	65	63	58	57	99
(b) Revocation of Regional Strategy									
RSS	7	0	0	0	0	0	0	0	0

Table 3 - Main Issues Raised and Council's Response

(a) Main Modifications

Note: This summary relates to objections only. It provides a synopsis of the main objections raised and the Council's response to these.

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
MM1	New policy in Section 7	Model sustainability policy	1	Whether or not the first two proposed sentences of Policy NP1 reflect the desire of the NPPF to achieve sustainable development.	No change required. The Inspector highlighted the need for inclusion of a model policy in his pre-Examination questions (Inspector Question 2: New Model Policy, 7 th August 2012).
			1	Whether suggested policy wording reflects the fact that the whole of the NPPF, rather than a selective quote, accurately reflects what is meant by sustainable development.	In response to this question, the Council emphasised that the Core Strategy already reflects the Government's presumption in favour of sustainable development. However, the Council is advised that the Government requires this presumption to be made more explicit through the inclusion of a separate policy, for which wording has been suggested by the Planning Advisory Service (PAS) and is available on the Planning Portal. MM1 is considered to be NPPF compliant. It is based on the PAS model policy, subject to minor changes to ensure it reflects local circumstances and to aid clarity. These minor changes are similar to those made by Watford Borough Council in the adopted Watford Core Strategy, which were accepted by their Planning Inspector.
MM2	8.16	Facilitation and	6	The robustness of the proposed wording,	No change required.

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response	
		management of development		and whether it needs to be strengthened by adding: <ul style="list-style-type: none"> • “only if and when there is a proven need for additional housing; • Reference to holding sites “in reserve until after 2021”; and/or • Clarification that Local Allocations should not be able to be brought forward to fill a shortfall. 	<p>As set out in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, the statement prepared by the Council before the Examination on Issue 6: Providing Homes, and discussed during the Examination hearings:</p> <ul style="list-style-type: none"> • Local Allocations will be required to ensure that the Council’s housing target (i.e. a minimum average of 430 dwellings per year) can be met in the later part of the plan period; and • the approach is considered to be NPPF compliant and reflect the established planning principle of seeking to make best use of brownfield land. <p>The additional text proposed through MM2 is considered to be robust. It provides the clarification that was sought during the Examination hearing and does not require further amendment. It accurately summarises the Council’s position regarding how development will be facilitated and managed, including the approach to releasing local allocations. This approach is further explained through other sections of the background text and through Policy CS3 itself.</p> <p>No change required. The reference is appropriate and intended to be comprehensive. A ‘housing provider’ is anyone / any organisation who provides housing. It is not necessary for the text to contain any further detail or to be more specific re who these</p>	
			2	Does the proposed text, when read collectively with other main modifications, seek to hold back development on reserve sites?		
			1	Is the proposed text compliant with the NPPF?		
			1	Whether the proposed text will help facilitate and manage development, or requires expanding to explain how the Council will monitor and manage housing delivery throughout the plan period.		
			1	Is the reference to “housing providers” sufficient, or should it be extended to include other organisations and individuals?		

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					individuals / organisations may be.
			1	Should the triggers for the early release of Local Allocations be more clearly articulated?	No change required. These triggers are clearly set out in Policy CS3 (as amended by MM3).
			1	Whether the current Urban Transport Plan for Berkhamsted and Tring is sufficiently robust.	No change required. This comment has been incorrectly entered by the respondent and refers to mc42, rather than MM2. It will therefore be considered alongside the other responses to the minor changes.
			1	The need to release more housing in Bovingdon due to the proposals for significant expansion of HMP The Mount and resultant job creation.	No change required. This issue does not directly relate to MM2. The level of housing appropriate for the village and the planned expansion of HMP The Mount were both discussed during the Examination. The Council does not consider there has been a material change in circumstances warranting any change to its current approach.
MM3	CS3	Delivery of local allocations	1	Are all Local Allocations required to meet local housing need?	No change required. This issue does not directly relate to MM3. See response to MM2. Local Allocations will be required to ensure that the Council's housing target (i.e. a minimum average of 430 dwellings per year) can be met in the later part of the plan period and hence ensure local housing need continues to be provided for.
			2	Concern that the new wording will encourage development of the Green Belt sites at any time during the plan period and leads to uncertainty for local residents.	No change required. Changes proposed to the wording of Policy CS3 and associated background text do not change the Council's overall approach to the release of identified Green Belt housing sites. Rather the changes articulate this position more clearly. The planned release date for each of the Local Allocations will be set out in the Site Allocations DPD. However, it is appropriate for there to be a

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					mechanism to release sites earlier than planned if additional housing is required to maintain a five year housing land supply. Should that be needed, the Council will signal that through the Annual Monitoring Report. This is a much clearer and certain approach for residents, avoiding speculative applications for new development sites, which have not been subject to community consultation and masterplanning work.
			1	Whether the impact on the infrastructure of Berkhamsted has been sufficiently considered when proposing the development of site SS1 (Land at Durrants Lane / Shootersway, Berkhamsted).	No change required. These issues were discussed at the Examination hearings and do not directly relate to the Main Modification. See also: <ul style="list-style-type: none"> • Statement prepared by the Council regarding Issue 11: Berkhamsted; and • Statement of Common Ground prepared for SS1 by the Council and landowners.
			1	Whether or not the development of site SS1 (Land at Durrants Lane / Shootersway, Berkhamsted) reflects the town vision and is suitable for a sensitive ridge top location.	
			1	Whether it is appropriate for any Local Allocations to be included in the Site Allocations DPD, or should await the conclusion of the early partial review.	No change required. Removal of the Local Allocations from the Core Strategy would remove a significant element of certainty, both for the housing strategy itself and for all the landowners and communities linked with these allocations. The Council therefore considers that the need for an early partial review has no impact upon the Local Allocations (Green Belt releases for housing) or Strategic Sites identified in the current Core Strategy. The Council should continue the process already begun i.e. agree the broad development requirements for each site within the Core Strategy and then define the precise site area and development requirements for each site through the Site Allocations DPD and

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					<p>masterplans that will accompany this document.</p> <p>See also response to MM2 and MM28.</p>
			1	<p>Whether it is appropriate to refer to Local Allocations not being delivered until after 2021.</p>	<p>No change required.</p> <p>The Local Allocations are not needed before 2021 on the basis of the Core Strategy housing target and the Council's estimates of housing land supply to meet that target (see Examination Document HG16 and the Council's Response to Issue 6: Providing Homes). However, the Council acknowledges that monitoring may show that one or more Local Allocation needs to be brought forward earlier than planned: in that circumstance Policy CS3 sets out the criteria to be considered. The partial review itself could possibly suggest earlier release, but as MM28 states: "The outcome of the review cannot be prejudged".</p> <p>The Council therefore intends to continue the process already begun i.e. agree the broad development requirements for each site within the Core Strategy and then define the precise site area and development requirements for each site through the Site Allocations DPD and masterplans that will accompany this document.</p> <p>See also response to MM28.</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
			1	Policy compliance with the NPPF, specifically with regard to: <ul style="list-style-type: none"> • Undue reliance on windfall sites. • Lack of certainty for landowners. • Appropriateness of references to phasing and programming. 	No change required. The Council's approach is considered to be NPPF compliant and no further changes are required. These issues are covered in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, are explained in the Statement prepared by the Council regarding Issue 6: Providing Homes and were discussed at the Examination hearings.
			1	Is the housing target appropriate in the light of issues of local housing need?	
			1	Should the housing chapter of the Core Strategy be removed, pending the conclusion of the early partial review?	No change required. Removal of the chapter would remove an essential component of any Core Strategy or Local Plan and render it unsound. It would create uncertainty for residents, landowners, developers and infrastructure providers and prevent the Council from moving forward with work to ensure the delivery of new homes. This would be contrary to the objectives of the NPPF and the Government's wish to "boost significantly the supply of new housing." See also MM28.
			2	The impact of development at West Hemel Hempstead upon: <ul style="list-style-type: none"> • Local road network, especially traffic congestion • Local wildlife (especially bats and red kites) • Security of existing residents • Pollution issues (noise and light). 	No change required. This issue does not directly relate to MM3. These issues were discussed at the Examination hearings. See also: <ul style="list-style-type: none"> • Statement prepared by the Council regarding Issue 10: Hemel Hempstead; and • Statement of Common Ground prepared by the Council and landowners for LA3.

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
			3	<p>Whether Cherry Bounce should be allocated for development due to:</p> <ul style="list-style-type: none"> • Loss of valuable recreation space and the impact of its loss on public health • Flooding issues in Gadebridge Park making this an unsuitable alternative area for recreation • Proximity of Howe Grove nature reserve • Impact on heritage of the town 	<p>No change required. This issue does not directly relate to MM3</p> <p>These issues were discussed at the Examination hearings. See also:</p> <ul style="list-style-type: none"> • Statement prepared by the Council regarding Issue 10: Hemel Hempstead; and • Planning Statement prepared for LA2 by the Council. <p>Site LA2 does not lie within the floodplain. Flooding of Gadebridge Park is a seasonal occurrence, natural to an area within the floodplain, adjacent to a river. The flooding does not affect the majority of the park or affect its ability to serve the recreational needs of local residents.</p>
			2	<p>Potential conflicts between proposed wording and the NPPF in terms of:</p> <ul style="list-style-type: none"> • The need to “boost significantly the supply of housing” • The presumption in favour of sustainable development • The need to “stimulate supply” of new housing. 	<p>No change required. This issue does not relate directly to MM3, but to the issue of overall housing numbers contained within the plan.</p> <p>As set out in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, summarised in the statement prepared by the Council before the Examination on Issue 6: Providing Homes and discussed at the Examination hearings, the housing numbers contained within the Core Strategy represent a considerable increase in housing provision, compared to that required in the current Dacorum Borough Local Plan 1991-2011.</p>
			2	Whether or not it is appropriate to defer	No change required. It has always been the Council's

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
				decisions on the release date for each Local Allocation to the Site Allocations DPD.	intention to take the key decisions and identify new housing locations in the Core Strategy and detail that through the Site Allocations DPD. This includes the release date for each Local Allocation, an intention which has been clarified through MM3.
			1	Whether or not reference to 2021 is based on sufficient evidence and is justified.	No change required. The evidence behind the reference to 2021 is set out in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, summarised in the statement prepared by the Council before the Examination on Issue 6: Providing Homes, and was discussed during the Examination hearings.
			1	The timing of the changes now proposed and whether or not their implications are understood by those potentially affected.	No change required. This issue does not directly relate to MM3. Changes proposed to the wording of Policy CS3 do not change the Council's overall approach to the release of identified Green Belt housing sites. Rather the changes are intended to articulate this position more clearly.
			1	Whether the policy wording is sufficiently flexible.	No change required. This issue does not relate directly to MM3, but to the broader issue of how the Council intends to deliver the Local Allocations. The policy wording sets out criteria: these aid clarity and flexibility, particularly when read in conjunction with new paragraph 8.16 (MM2).
MM4	CS5	Small scale development	2	Does the policy adequately reflect the NPPF, particularly in terms of: <ul style="list-style-type: none"> Reference to "small scale development" 	No change required. MM4 has been put forward as a result of changes to Green Belt policy in the NPPF and is considered to accurately reflect these changes. Policy CS5 indicates that further guidance will be

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
				<ul style="list-style-type: none"> • Definition of “appropriate” re-use of permanent, substantial buildings • Reference to rural economy in clause (ii) 	<p>provided. This will pick up detailed matters such as small scale or proportionate / disproportionate development and appropriate uses in that context.</p> <p>The term ‘small-scale’ was used in the original policy wording and is not part of the proposed Main Modification.</p> <p>Policy CS14 supports the rural economy: this is defined in paragraph 11.10. Its definition is not a new issue.</p>
			1	Whether the policy should refer to the Local Allocations having been removed from the Green Belt (and shown as such on associated maps).	No change required. The policy as worded clearly reflects the Council’s position with regard to Local Allocations i.e. that they are identified in the Core Strategy as broad locations, with their precise boundaries and development requirements articulated through the Site Allocations DPD and associated masterplans. The wording also reflects that of Policy CS3 (as amended by MM3) and associated background text.
			1	Is “small-scale” development appropriately defined?	No change required. Policy CS5 indicates that further guidance will be provided. The use of the term small-scale or proportionate (disproportionate) depends upon context. Judgement is required, so it is not possible or appropriate to give an absolute answer. For example, small-scale development is permitted in Selected Rural Area villages. Small-scale would refer to the height, bulk, extent/coverage and impact of development. It would be compared against the character of a small village and maintenance of that character. A development that may be appropriate in

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					<p>one village may not be appropriate in another.</p> <p>While a general definition could be given in the Glossary, this would inevitably be broad and would be of limited help. The 'further guidance' referred to in both Policies CS5 and CS7 will provide much better clarification.</p>
			2	<p>Whether or not the reference to there being no general review of the Green Belt boundary through the Site Allocations DPD is appropriate.</p>	<p>No change required. This statement is included for clarity and to reflect the text relating to the partial review (MM28).</p> <p>In his initial response dated 19 November 2012, the Inspector has suggested that a partial review of the plan will include a comprehensive Green Belt review, together with a further assessment of household projections and the potential role that other areas could play in meeting Dacorum's future housing needs. MM28 makes it clear that the partial review of the Core Strategy should follow completion of the Site Allocations and Development Management DPDs. It is not considered necessary or appropriate to carry out another Green Belt review in advance of this partial review process.</p> <p>Irrespective of the Inspector's requirement for a comprehensive Green Belt review, the Council considers that it has already carried out a thorough and robust assessment of potential development locations within the Green Belt, through Examination Document HG15: Assessment of Potential Strategic Sites and Local Allocations. To reopen the issue of Green Belt releases at the Site Allocations stage</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					would be detrimental to ensuring the delivery of appropriate, sustainable new housing development within the Borough.
MM5	CS7	Small scale development	1	Should the list of settlements be expanded to refer to “other similar settlements” to allow flexibility?	<p>No change required. This issue does not relate directly to MM5, but to the broader issue of the settlement hierarchy.</p> <p>The policy appropriately refers to the Rural Area villages as listed in the Settlement Hierarchy (Table 1) and defined on the Proposals Map. All villages considered to be ‘similar’ are already within Rural Area village category, so there is no need to add the extra wording suggested. The settlement hierarchy defines both Rural Area and Green Belt villages as ‘Areas of Development Restraint.’ ‘Other small villages and the countryside’ also fall under this broad heading, but are in a lower (bottom) category of the hierarchy. This highlights that they are the least sustainable areas of the borough, and where it is appropriate for greater development restraint to apply.</p>
			1	<p>Whether the policy should be amended to:</p> <ul style="list-style-type: none"> • Delete the reference to “small-scale” and replace with “rural” • Include additional category which refers to developments to accommodate urgent social / economic needs of a local community • Expand clause referring to “substantial buildings” to include 	<p>No change required. The Council considers the policy to be appropriate as currently worded.</p> <p>The term ‘small-scale’ appears in the original policy wording and is not part of the proposed Main Modification. The term ‘rural’ is not considered a suitable substitute. One refers to the location of the development and the other to its size. All development covered by Policy CS7 will be ‘rural’ in location, as the policy only applies to the rural area.</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
				reference to conversions and changes of use.	Development required to meet the urgent social and/or economic needs of a local community is already covered by criteria (a) to (g), and could also be allowed as permissible small scale development, provided it meets the criteria set out. Criterion (iv) relating to “substantial buildings” already refers to the issue of appropriate re-use. This can include change of use and conversions, where these comply with other policy clauses.
MM6	9.3	Managing car parking	1	The need to caveat the first bullet point to reflect the fact that travelling by car is often the only practical option.	No change required. These issues do not relate directly to MM6 and MM7.
MM7	9.8	Managing car parking	1	The need to include a new bullet point that refers to “in some cases increasing parking supply” and to caveat the introductory section, to ensure that mobility issues do not stifle development.	The first bullet point remains as per the original text considered at the Examination and is provided for context only. The issue of managing travel demand and the dependence upon the car was covered in the Council’s statements regarding Issue 3: Accessibility and discussed at the Examination hearings. The Council considers its approach to both reducing the need to travel and managing car parking to be robust, reasonable and reflect the requirements of the NPPF.
MM8	11.3	Strengthening advice on non B class uses	1	No issues raised. [West Herts Hospital Trust are noted as raising an objection, but their comment notes the existence of the new paragraph and the fact that they welcome the fact that new jobs in healthcare are anticipated].	No change required.

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
MM9	12.5	Office	1	What would the “release” of office sites in the final sentence be for and should it be prefaced by “subject to monitoring evidence.”	<p>No change required. The release could be for a range of uses depending on the location and characteristics of the site in question. It is therefore not appropriate to refer to any particular categories within the background text.</p> <p>The actions outlined in paragraph 12.5 could not occur without reference to monitoring information, so the addition of explicit reference to this is not necessary. In addition, any proposed release of employment land would be subject the requirements of Policy CS15. This policy would not allow a release to be made without appropriate evidence being provided. This would include monitoring information.</p>
MM10	CS15	Flexibility in office floorspace target	1	Whether or not the amendment to refer to the figure of 131,000sqm as a target, rather than a minimum figure is sufficient to meet the requirements of the NPPF.	No change required. This amended wording better reflects the conclusion of the Council’s employment technical work. It introduces a little more flexibility into the policy and this fully reflects the approach advocated to employment land within the NPPF.
			1	Is the evidence base behind the floorspace figure robust and the policy sufficiently flexible?	<p>This issue does not relate directly to MM10, but to the general issue of employment floorspace. It was covered in the Council’s statement regarding Issue 5: Strengthening Economic Prosperity and discussed at the Examination hearings.</p> <p>The Council’s evidence remains robust and the policy wording is sufficiently flexible.</p>
MM11	CS16	The main retail hierarchy	0	No issues raised.	-
MM12	14.14	Management and phasing of housing land	6	<p>Whether the new text complies with the NPPF, in respect of the following matters:</p> <ul style="list-style-type: none"> The need for the Council to take 	No change required. Many of the issues do not relate to MM12, but to the wider issue of the supply and management of housing land and the approach to

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
		supply		<p>action before housing supply falls 'significantly below expectations'</p> <ul style="list-style-type: none"> • Whether the approach is sufficiently pro-active and flexible • Whether it is appropriate to defer more detailed requirements to the Site Allocations DPD • The requirement to maintain a 5 and 15 year land supply • The requirement to 'boost significantly the supply of housing' and 'respond positively to wider opportunities for growth' • Any reference to the programming of allocations, the adoption of a sequential approach and 'conserving land.' 	<p>delivering the Local Allocations. These issues are considered in Examination Document HG15: Background Paper – Selecting the Core Strategy Housing Target; the statement prepared by the Council for the Examination on Issue 6: Providing Homes, and discussions at the Examination hearing itself.</p> <p>The Council is aware of the NPPFs requirements regarding demonstrating a 5 and 15 year housing land supply and will be working proactively to ensure these are maintained.</p> <p>Local Allocations will help ensure a steady and sufficient supply of housing over the plan period and help address local housing needs within individual settlements.</p> <p>The 430 dpa target represents a significant increase in delivery compared to the current target set out in the Dacorum Borough Local Plan 1991-2011. Moreover, if full account is taken of windfalls, then more may actually be delivered. However, it is appropriate to take a reasonable and balanced approach to housing delivery in an area constrained by Green Belt and the Chilterns AONB. These constraints are recognised in the NPPF (paragraph 14) and explained further in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target</p> <p>See also responses to MM2, MM3, MM13 and MM14.</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
			3	Does the new text appropriately refer to housing needs after the plan period i.e. post 2031?	No change required. It is not appropriate for a plan that covers the period to 2031 to deal in detail with expected development needs beyond this date. This is particularly true where it is agreed that a partial review will reconsider the issue of household projections (as stated in the new text to be added via MM28). The proposed wording already refers to the fact that “it is anticipated that there will continue to be some housing needs which should be met after 2031.” This wording is considered reasonable within this context.
			1	Should reference to priority being given to the redevelopment of Council garage sites be added?	No change required. Garage sites are a particular source of potential future housing supply that is being considered by the Council. However, not all sites are suitable for redevelopment and it is not considered appropriate to single them out for specific reference within the text.
			1	Potential for conflicts of interest as a result of the relationship between the Council and developers being too close and insufficiently transparent.	<p>No change required. This issue does not relate directly to MM12.</p> <p>As encouraged by Government, the Council seeks to work constructively with developers and landowners in order to deliver high quality development in appropriate locations. Co-operation is beneficial because it is based on planning policies within the current (and emerging) Local Plan; it reduces conflict and uncertainty; and it is in the community interest.</p> <p>Where Council-owned land is involved, there is always a clear demarcation between the Council's role as a landowner and that of local planning authority.</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
MM13	14.15	Management and phasing of housing land supply	1	Whether the approach is too open-ended and requires clearer reference to Local Allocations not being released until after 2021.	<p>No change required. The NPPF requires the Council to ensure that it has both a 5 and 15 year land supply, based on its agreed average annual housing target (i.e. 430 dwellings). It is appropriate for the Core Strategy to set out the options the Council may consider should supply fall significantly below expectations.</p> <p>The amended wording of paragraph 14.15 does not change the Council's approach to the release of identified Green Belt housing sites. Rather the changes are intended to articulate this position more clearly. The planned release date for each of the Local Allocations will be set out in the Site Allocations DPD. However, it is appropriate for there to be a mechanism to release these sites earlier than planned if additional housing is required to maintain a five year housing land supply.</p> <p>See also responses to MM2 and MM3.</p>
			1	Whether it is appropriate for costs associated with unblocking a site to be borne by the Council (and hence taxpayers), rather than the developers / landowners.	<p>No change required. The NPPF requires the Council to ensure that it has both a 5 and 15 year land supply and the Council has an obligation to support the delivery of homes to meet local housing needs. The Council will only help unblock a site where the delivery of that development is of wider benefit to the Borough and it is not reasonable or viable for the landowner / developer to bear such costs alone. There are strict rules in place governing how Councils can support private companies and avoid what is termed 'state aid.' These rules will be followed at all</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					times.
			3	<p>Whether the text reflects the NPPF by:</p> <ul style="list-style-type: none"> Stimulating housing delivery and the intention 'to boost significantly the supply of housing.' Being sufficiently pro-active if supply falls below expectations Providing a practical and flexible framework within which planning applications can be made Holding local allocations 'in reserve' Deferring decisions on release dates to a subsequent DPD 	<p>No change required. Many of these issues do not directly relate to MM13, but to the wider issue of the supply and management of housing land and the approach to delivering the local allocations. These issues have been considered in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, summarised in the statement prepared by the Council before the Examination on Issue 6: Providing Homes and discussed at the Examination hearings.</p> <p>See also responses to MM3 and MM12.</p>
			1	Whether other options for increasing supply may be available.	No change required. The text already makes it clear that these are examples of how supply could be increased.
			1	Whether it is clear what is meant by the word "significantly" in the first sentence.	No change required. The text appropriately reflects the reference in Policy CS17: New Housing to "an average of 430 net additional dwellings being provided each year (between 2006 and 2031): i.e. the figure is an average across the plan period, rather than an absolute yearly number that must be achieved. The trajectory set out in Graph 2.1 of Appendix 2 of the Core Strategy identifies that there will be years when delivery exceeds this figure, and others where delivery rates are lower. The Council will monitor trends and potential housing land availability in relation to the average target, the trajectory in Appendix 2 and other factors.

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					<p>Market demand factors are critical in regulating and stimulating the provision of new housing. Normally over an economic cycle there are higher and lower periods of demand. However, the Council recognises that housing supply is part of the delivery equation: it may therefore be necessary to take action to increase or stimulate supply. The judgement about action will consider what is appropriate in context at a particular time. The Council will not lose sight of the target (i.e. to deliver at least 430 dwellings per annum over the plan period as a whole): what is significant is that there is sufficient capacity (including land available) for that to be achieved.</p>
MM14	CS17	Phasing	2	Whether the proposed housing target is high enough and will enable identified housing needs to be met.	<p>No change required. This issue does not relate directly to MM14, but to the wider issue of housing need and the housing target contained within the Core Strategy.</p> <p>These issues have been considered in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, summarised in the statement prepared by the Council before the Examination on Issue 6: Providing Homes and discussed at the Examination hearings.</p>
			1	Whether the housing chapter should be removed from the plan and planning decisions made on the basis of the NPPF until the partial review is completed.	<p>No change required. This issue does not directly relate to the MM14, but to the wider issue of housing needs and land supply.</p> <p>As set out in response to MM3, removal of the chapter would remove an essential component of any Core</p>

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					Strategy or Local Plan and render it unsound. It would create uncertainty for residents, landowners, developers and infrastructure providers and prevent the Council from moving forward with work to ensure the delivery of new homes. This would be contrary to the objectives of the NPPF and the Government's wish to <i>"boost significantly the supply of new housing."</i>
			1	The need for additional research to be undertaken with neighbouring local planning authorities with regard to: <ul style="list-style-type: none"> • Green Belt boundaries • Housing target • Distribution of development (with regard to settlement hierarchies) 	No change required. This issue does not directly relate to MM14, but to the wider issue of housing needs and land supply. Issues relating to the Green Belt and housing numbers will be considered as part of the partial review referred to in MM28. Work on a comprehensive Green Belt Review is currently being jointly commissioned with St Albans City and District Council and Welwyn Hatfield Borough Council. For the reasons discussed in the Council's statements regarding Issue 2: The Distribution of Development (Settlement Hierarchy) and the Green Belt) and discussed at the Examination hearings, the settlement hierarchy is considered to remain robust in the long term.
			1	Whether the duty to co-operate has been complied with.	No change required. A 'Duty to Co-operate' Statement has been prepared in accordance with the requirements of the Localism Act. This sets out how the Council has undertaken cross-boundary working, collaboration with a variety of partners and areas of continuing discussion. It is important to stress that it is a duty to co-operate rather than to agree.
			1	Level of clarity regarding how the 430 target is derived.	No change. This issue does not directly relate to the MM14. Examination DocumentHG15: Background Paper – Selecting the Core Strategy Housing Target;

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					the statement prepared by the Council for the Examination on Issue 6: Providing Homes clearly set out the background to the 430 figure and explains how a range of other targets were tested and discounted. The issue of housing targets was also discussed at length during the Examination hearings. MM28 sets out how this target will be reassessed as part of the partial review process.
MM15	CS19	Assessing the affordable housing requirement	3	The need for the policy to: <ul style="list-style-type: none"> Clearly indicate the maximum level of affordable housing units that will be sought Include a viability clause Be sufficiently flexible to allow exceptions to be made. 	No change required. These issues have already been addressed through the Report of Representations (Examination Document SUB5). The Policy clearly sets out the Council's general expectation that 35% of new homes will be affordable. Due to the very high level of local affordable housing need, it is appropriate for the policy to allow for higher levels (e.g. 40%) on larger sites that are defined through the Site Allocations DPD. There are clear caveats within the policy regarding both viability and need.
			1	Whether it is realistic to deliver 100% affordable housing on rural sites.	No change required. The Policy reflects the Core Strategy's usual expectation as to the type of development. It fits with Policies CS5-7 (relating to Green Belt and the Rural Area). It does not preclude a minor element of market housing if circumstances justified it – but this is not the norm. This amendment seeks to reflect this position more clearly, through the introduction of the word 'normally' in MM15, i.e. <i>"On rural housing sites 100% of all new homes will normally be affordable (Policy CS20)."</i>
			1	Is it reasonable to require 75% of affordable units to be rent, when the NPPF encourages the widening of mechanisms	No change required. The policy sets out a general expectation which is considered reasonable in the context of evidence of local housing need. However,

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				regarding home ownership?	the policy makes it clear that there is flexibility in its application as mix will be judged against a range of criteria, including viability. The new Affordable Housing SPD provides further advice and guidance.
MM16	CS22	Gypsy and Traveller pitches	1	Concerns over the robustness of the evidence base and potential direct and indirect policy implications for other local planning authorities within Hertfordshire.	No change required. In order to ensure an up-to-date evidence base, the Council, together with Three Rivers District Council, commissioned consultants Opinion Research Services (ORS) to undertake a new needs assessment (Dacorum Borough Council and Three Rivers District Council: Traveller Needs Assessment, January 2013 available via http://www.dacorum.gov.uk/default.aspx?page=8080). This study provided clear recommendations regarding future pitch requirements, using ORS's standard methodology. The Council is aware that there are unmet needs within the Borough and is taking action to remedy this. The ORS report endorses the Council's approach of delivering new Gypsy and Traveller accommodation as part of new greenfield housing sites. Further information regarding the scale and location of new provision will be provided in the Site Allocations DPD.
MM17	15.3	Social infrastructure clarification	1	No issues raised. [West Herts Hospital Trust are noted as raising an objection, but their comment is actually in support of the importance attached in the Core Strategy to healthcare delivery and the linking of planning policy to infrastructure delivery].	No change required.
MM18	CS23	Social infrastructure clarification	1	Whether the final sentence is compliant with Circular 5/05 and the NPPF.	No change required. The policy clearly sets out the Council's normal expectation that development will contribute towards the provision of social infrastructure. Policy CS35: Infrastructure and
			1	Whether reference to 'its fair share' should be added after the reference to 'contribute'	

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
				in the final paragraph.	Developer Contributions provides further clarification and requirements regarding how such contributions will be assessed and secured.
			1	Whether the 3 rd paragraph should include a caveat.	No change required. The new wording includes a caveat regarding dual use of new and existing facilities. There are also appropriate caveats relating to other aspects of the policy e.g. provision of new school facilities and protection of existing social infrastructure.
MM19	17.2	Heritage assets protection	1	Whether or not it is reasonable to assume that all heritage assets are important enough to be conserved.	No change required. This is considered to be an appropriate starting point when considering all heritage assets. The second sentence provides the necessary caveat regarding the relative importance of each asset. This approach is consistent with the NPPF which requires local planning authorities to “ <i>recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance</i> ” (paragraph 126). Policy CS27: Quality of the Historic Environment sets out how this will be achieved and the Glossary defines what is meant by the term.
MM20	18.23	Offsetting	1	Whether the words ‘where appropriate’ are needed at the beginning of paragraph 18.23.	No change required. This caveat is not required as the Council’s general expectation is that this information should be provided in support of all applications. The level of detail appropriate for different types of application will be set out in an amended version of the Sustainable Development Advice Note (which is currently under review).
			1	The need for further explanation regarding how the fund will operate; projected income levels and how funding will be	No change required. Policy CS30: Sustainability Offsetting, already states that “Details of the Council’s approach to sustainability offsetting, including the

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
				spent.	<p>operation of the Sustainability Offset Fund, will be set out in further guidance.” This guidance requires further work and detailing. Guidance itself is likely to change over the plan period as Government advice and regulations evolve. It will be subject to public consultation in its own right.</p> <p>Also see response to MM21.</p>
MM21	CS29	Criterion on biodiversity	1	Whether the final sentence regarding viability undermines the policy that precedes it.	<p>No change required. The first and final sentences of the policy are complementary, rather than contradictory. Sustainable design and construction is a new and evolving area of work. The Council’s general approach is that the criteria set out in the policy will be met. However, it is appropriate to take into account viability and feasibility issues. It is owned that, when looking at MM20, MM21 and MM22 together, the wording of the penultimate paragraph in Policy CS29 is inconsistent. It points to an automatic contribution to the Sustainability Offset Fund (if on-site energy or tree planting requirements are not met). The wording should conform to the intention in the first paragraph of Policy CS30 (MM22). The Council therefore asks the Inspector to substitute the following wording:</p> <p>Where new development cannot meet on-site energy or tree plantingcanopy requirements, the applicant will be expected to contribute make an appropriate financial contribution towards <u>sustainability offsetting if at all possible (see Policy CS30)</u> the Sustainability Offset Fund.</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					[This wording is identical to the Proposed Examination Change put forward by the Council, i.e. H-24 in the Hearing Changes].
			1	Is reference to further guidance acceptable in a Core Strategy?	No change required. This does not directly relate to MM21. Policy CS29 does not include any reference to 'further guidance.' However, the Core Strategy is the overarching policy document within the Council's new Local Planning Framework. It is therefore considered appropriate, as a general principle, for further detail regarding policy implementation to be deferred to subsequent DPDs or to supplementary guidance.
			1	Clarity of criterion (h) and the need to include a caveat regarding 'subject to site constraints.'	No change required. This does not directly relate to MM21, as criterion (h) remains unchanged.
MM22	CS30	Offsetting	0	No issues raised.	-
MM23	Figure 17	Gade zone – leisure, foodstore, walk and cycleway	0	No issues raised.	-
MM24	CS33	New superstore	1	Whether Hemel Hempstead should be the location for a new cultural facility, rather than expecting residents to travel to neighbouring towns.	<p>This comment does not relate to MM24 and raises no new issue. Item (f) under "Use" covers the point as far as the Council is able.</p> <p>The wording of item (a) however is inaccurate and inconsistent with MM23 which allows for the possibility of a new food store in the Gade Zone. The Council therefore asks the Inspector to substitute the following wording for item (a):</p> <p>(a) secure additional retail stores in the Marlowes</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					Shopping Zone <u>and</u> a new food store; [The word “and” replaces “including”.]
MM25	21.12	Berkhamsted archaeological assets	0	No issues raised.	-
MM26	Section 23	Kings Langley archaeological assets	0	No issues raised.	-
MM27	26.14	Heritage assets protection	0	No issues raised.	-
MM28	New sub-section to Section 29	Partial review text	2	Whether it is necessary to have a partial review when the Green Belt has already been reviewed and sufficient land identified to meet housing need through the current plan.	No change required. Reference to the partial review of the Core Strategy follows the preliminary findings of the Inspector dated 19 November 2012. The partial review will include a comprehensive Green Belt review, together with a further assessment of household projections and the potential role that other areas could play in meeting Dacorum’s future housing needs. Whilst accepting the need to include reference to the partial review to enable the Core Strategy to progress as quickly as possible, the Council sympathises with the objector because it considers it has already carried out a thorough assessment of potential development locations within the Green Belt, (through Examination Document HG15: Assessment of Potential Strategic Sites and Local Allocations) and has allocated an appropriate amount of new housing in the district (see Examination Document HG16: Background Paper – Setting the Core Strategy

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
			5	Has the Council legally complied with the duty to co-operate and, if not, whether this failure to comply is capable of remediation through a main modification.	<p>Housing Target).</p> <p>No change required.</p> <p>A 'Duty to Co-operate' Statement has been prepared in accordance with the requirements of the Localism Act. This sets out how the Council has undertaken cross-boundary working, collaboration with a variety of neighbouring authorities and partners, and areas of continuing discussion. This should satisfy the legal obligation. In addition, it is important to stress that there is a duty to co-operate with neighbouring authorities rather than for them to agree with the Council.</p> <p>The Inspector provided his preliminary findings on 19 November 2012. The Inspector had not reached a conclusion on the soundness of the Core Strategy. He did however identify two concerns – the lack of a robust and comprehensive Green Belt review and the limited emphasis that appears to have been given to the role of neighbouring authorities in accommodating some of Dacorum's housing needs. More weight should have been attached to the potential role of east Hemel Hempstead in meeting the borough's housing needs more fully. The Council's letter in response (dated 30 November) comments, <i>"You will be aware that this Council remains willing to co-operate on planning the east side of Hemel Hempstead."</i></p> <p>The Inspector suggested alternative options that the Council could consider in the light of his concerns.</p>

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					<p>One of those options was for the Council to undertake a partial review of the Core Strategy. MM28 outlines that approach.</p> <p>The Council considers that the Inspector is under an obligation to reach his own conclusion on whether the Core Strategy is sound. Paragraph 182 in the NPPF identifies four tests of soundness. The Inspector can find the Core Strategy sound as submitted: i.e. on all four tests of soundness.</p> <p>However if he finds an element that is unsound, he must either recommend non-adoption or, if satisfied that the duty to co-operate (with adjoining authorities and relevant others) has been complied with and if asked by the Council (as local planning authority), he must recommend modifications of the document in order to make it sound.</p> <p>The Council considers that it has satisfied the duty to co-operate in the preparation of the Core Strategy and that with MM28 and the undertaking of an early partial review to address the particular matters raised by the Inspector the Core Strategy is sound.</p> <p>What MM28 effectively does is to conclude that the issues which potentially go to soundness identified by the Inspector should not be left for the full plan period: they should be addressed further and as appropriate corrected.</p>
			10	Whether it is appropriate to use main modifications to address key issues such	No change required. See preceding response.

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
				<p>as:</p> <ul style="list-style-type: none"> • Quantum and location of development • Scale of future housing need • The scale of any shortfall that may need to be met elsewhere • The need for a comprehensive Green Belt review 	<p>In his preliminary findings dated 19 November 2012, the Inspector did not make any specific conclusion on the issue of soundness. He did however identify two issues which potentially go to soundness and indicated four alternative courses of action available to the Council: three of those courses of action would address the potential issues. The Council is following a course of action identified and supported by the Inspector, i.e. a process of partial review. This is similar to action taken by a number of other Councils, e.g. Milton Keynes and Hertsmere, and is reasonable while local authorities adjust to the removal of the strategic tier of planning.</p> <p>The Inspector is under a legal obligation to consider whether, in the event he considers any element of the Core Strategy unsound, there are modifications which can appropriately be made. That can quite reasonably relate to the amount of housing to be delivered and where.</p> <p>The Council has prepared a justifiable strategy in its view, one which is consistent with the NPPF taken as a whole. It has addressed all the principal concerns raised through the examination and responded to the Inspector's questions. It will take some time to explore the potential opportunity at east Hemel Hempstead (in St Albans district) and possibly others: in the meantime, the planning strategy for Dacorum is appropriate.</p> <p>The critical point is that the Inspector must look at the</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					<p>Core Strategy and its relationship to the NPPF as a whole. If there are any issues which potentially go to soundness which the Inspector finally decides should be addressed, he will need to weigh up:</p> <ul style="list-style-type: none"> • the benefit of having an up to date planning strategy (and its delivery); • whether every element of the strategy is appropriate; • the degree of any issues which potentially go to soundness; • the way that can reasonably be addressed, particularly through main modifications; and • any other factors he considers reasonable and relevant in weighing up the evidence. <p>See also section 4 of Part 1 of the Report of Representations.</p>
			1	Whether it is appropriate for the Site Allocations DPD to include any local allocations until the early partial review has been completed.	<p>No change required.</p> <p>The Local Allocations are not needed before 2021 on the basis of the Core Strategy housing target and the Council's estimates of housing land supply to meet that target (see Examination Document HG16 and the Council's Response to Issue 6: Providing Homes). However, the Council acknowledges that monitoring may show that one or more Local Allocation needs to be brought forward earlier than planned: in that circumstance Policy CS3 sets out the criteria to be considered. The partial review itself could possibly suggest earlier release, but as MM28 states: <i>"The outcome of the review cannot be prejudged"</i>.</p>
			2	Whether it is possible to specify that local allocations are only required after 2021, prior to an early partial review being completed	

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					<p>The need for an early partial review should have no impact upon the inclusion of Local Allocations (Green Belt releases for housing) identified in the current Core Strategy. The Inspector has not advised the Council to add to these sites, or to take any of the sites out of the plan. He has also not suggested that the Council makes any changes to its policies that set out how and when these sites will be brought forward for development.</p> <p>The Council therefore intends to continue the process already begun i.e. agree the broad development requirements for each site within the Core Strategy and then define the precise site area and development requirements for each site through the Site Allocations DPD and masterplans that will accompany this document.</p>
			10	The need for an explicit timetable to be included for the early partial review, covering commencement, completion and key stages in between.	It is considered more appropriate to include the main information relating to the timing and content of the partial review within a revised Local Development Scheme (LDS), rather than in the Core Strategy itself. The LDS will be reviewed following adoption of the Core Strategy and may be amended from time to time. The timetable contained within the LDS is updated each year, as part of the Annual Monitoring Report process. While the challenge for the Council is to align its progress with neighbouring authorities, the Council understands the desire for an effective and expeditious approach. It therefore has no objection to the following text being added to the end of paragraph 29.9 in MM28:

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					<i>"The Council will aim to adopt the review by 2017/18."</i>
			1	The appropriateness of the words 'and more significantly' at the end of sub-para (b).	No change required. The emphasis placed by the text upon cross-boundary co-operation is considered appropriate. In his preliminary findings, the Inspector himself says he considers that the Council should have attached greater weight to the role that east Hemel Hempstead (in St Albans district) could play in meeting the Borough's housing needs more fully. It is issue where Dacorum is largely dependent upon the actions of other local planning authorities, despite the requirements of the 'Duty to Co-operate'. It is therefore considered to be the most significant challenge posed by the partial review.
			1	Location of the text relating to the early partial review.	No change required. The section on 'Implementation and Delivery' is the most logical location for the partial review text. Although the partial review is distinct in that it is identified now, the principle of review is normal to a proper, analytical monitoring process. The Council will be reviewing the success of its planning policies throughout the planning period: if there are difficulties, the Council will consider whether to amend, suspend or remove a particular policy, and in some cases consider what other remedial action should be taken.
			6	Whether the suggested text complies with the 3 rd Core Planning Principle (paragraph 17) of the NPPF and other related tests (i.e. meeting objectively assessed housing needs and review of the Green Belt)	No change required. The NPPF should be read as a whole and not selectively. The Council therefore invites the Inspector to weigh up the advice in the NPPF as a whole and to assess in the light of all the relevant circumstances whether the Core Strategy is sound – with or without

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					<p>modifications.</p> <p>From his preliminary findings, the Inspector appears to have no significant concerns in terms of economic development. The concern relates to whether it is possible to achieve more housing in the light of a fuller Green Belt review and opportunities for development in other areas which may be achieved under the duty to co-operate. In particular, more weight should be given to potential opportunities for new housing at east Hemel Hempstead.</p> <p>In principle, the approach for a partial review is rational and MM28 reasonable.</p>
			2	The need to withdraw the housing chapter and use the NPPF to determine planning applications in the interim.	<p>No change required. This issue does not directly relate to the MM28, but to the wider issue of housing needs and land supply.</p> <p>As set out in response to MM3, removal of the chapter would remove an essential component of any Core Strategy or Local Plan and render it unsound. It would create uncertainty for residents, landowners, developers and infrastructure providers and prevent the Council from moving forward with work to ensure the delivery of new homes. This would be contrary to the objectives of the NPPF and the Government's wish to <i>"boost significantly the supply of new housing."</i></p>
			3	The need to delay work on subsequent DPDs until the early partial review has been completed.	No change required. Delaying the preparation of subsequent DPDs would delay the implementation of the Core Strategy and slow the detailing and delineation of the Local Allocations. Evidence work for

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					the partial review will take time but can be progressed in parallel. The Council believes its approach will provide the most effective planning for Dacorum and enable more effective delivery of the duty to co-operate, giving full weight to potential opportunities to the east of Hemel Hempstead.
			2	Whether the current dwelling target can meet identified local housing needs (both open market and affordable).	<p>No change required. This issue does not relate directly to MM28, but to the wider issue of housing need and the housing target.</p> <p>These issues are covered in Examination Document HG16: Background Paper - Setting the Core Strategy Housing Target, are explained in the Statement prepared by the Council regarding Issue 6: Providing Homes and were discussed at the Examination hearings.</p>
			2	Whether there has been sufficient justification to discount other available Green Belt housing sites, i.e. Blegberry Gardens in Berkhamsted and Waterside Way in Tring.	No change required. These issues do not relate directly to MM28, but to decisions taken regarding the most appropriate Local Allocations and the distribution of new homes across the borough.
			2	Whether sufficient housing allocations have been made in Berkhamsted and Tring, having regard to the size and capacity of the settlements.	<p>Examination Document HG15: Assessment of Potential Local Allocations and Strategic Sites set out the basis for deciding which Local Allocations to include within the Core Strategy. In the case of Berkhamsted and Tring, further information regarding the relative merits of the chosen site(s) over those discounted are explained in the Statements prepared by the Council regarding Issue 11: Berkhamsted and Issue 12: Tring.</p> <p>The statement prepared for Issue 2: Distribution of</p>

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					<p>Development (Settlement Hierarchy) and the Green Belt explains the decision relating to the settlement hierarchy. Issues, such as local infrastructure capacity and landscape constraints, which affect the ability of Berkhamsted and Tring to accommodate new development, were set out in Issue papers relating to Issue 11: Berkhamsted and Issue 12: Tring.</p> <p>The issue of both the distribution of development and the choice of Local Allocations were discussed thoroughly at the Examination hearings.</p> <p>The Green Belt Review indicated in MM28 will of course cover the full extent of the Green Belt in Dacorum (and other areas).</p>
			4	<p>The need to ensure the partial review is not prejudiced by:</p> <ul style="list-style-type: none"> • anticipating that higher housing will be needed; • assuming that more Green Belt land will be required; and • failing to fully recognise the Green Belt purpose relating to urban regeneration. 	<p>No change required. The Council agrees with these concerns. The text of the MM28 clearly states that <i>“The outcome of the review cannot be prejudiced.”</i></p>
			1	<p>The need to secure delivery of the East Hemel Hempstead Area Action Plan in partnership with St Albans City and District Council.</p>	<p>No change required. This does not directly relate to MM28. The Council is fully aware of the need to continue liaison and co-operation with St Albans City and District Council, particularly with regard to land immediately to the east of Hemel Hempstead, whatever the scale of development and change there.</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					<p>A comprehensive Green Belt Review is currently being commissioned by jointly by the two authorities (and with Welwyn Hatfield Council). This will consider the role of this area, and all other Green Belt within the study area, against the Green Belt purposes set out within the NPPF. This study will inform the partial review (and development of St Alban's emerging Local Plan).</p>
			6	<p>The need to undertake additional work prior to continuation of the Examination or withdrawal of the Core Strategy until this additional work is completed.</p>	<p>No change required.</p> <p>In his preliminary findings dated 19 November 2012, the Inspector indicates four alternative courses of action available to the Council.</p> <p>The representations indicate two of those possible courses of action. The Council has rejected them because:</p> <ul style="list-style-type: none"> • the additional work required will involve substantial co-operation with adjoining authorities and will take time; • the adoption of the Core Strategy will be postponed, removing the framework for subordinate documents such as the Community Infrastructure Levy (CIL); • the Council will be left without an up-to-date planning policy document; • the Inspector has suggested a better alternative. <p>The Council is therefore following a course of action</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					supported by the Inspector i.e. a process of partial review. This is similar to action taken by a number of other Councils e.g. Milton Keynes and Hertsmeire, and is reasonable while local authorities adjust to the removal of the strategic tier of planning.
			1	The need to consider additional development in the existing Green Belt in return for the allocation of new Green Belt land elsewhere.	No change required. The potential for additional areas of the countryside to be identified as Green Belt will be considered through the comprehensive Green Belt Review work that is currently being commissioned. The potential in Dacorum is likely to be very limited however, because of the designation of the Chilterns AONB and overall position of the Metropolitan Green Belt. In any event, a 'straight swap' of one area of land for another is not always appropriate or justifiable. Any 'new' land would need to meet the Green Belt purposes set out within the NPPF.
			2	Whether it is appropriate to consider providing for some of DBC's housing needs in an adjoining authority, when sites are available within the borough.	No change required. Such consideration is quite appropriate as a general principle. In an area constrained by the Green Belt, the Chilterns Area of Outstanding Natural Beauty and other designations, the Council should consider whether there are better options than to use all or any of this land. This may entail restriction of development and/or diversion of growth. It was the approach adopted in Hertfordshire through the former structure plans and regional plans, and was consistent with national planning policy. The duty to co-operate between neighbouring authorities replaces strategic planning, but the national planning policy context is similar. The NPPF expects development to be

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					<p>restricted in certain areas, such as the Green Belt: it also looks to achieving sustainable development and the most sustainable locations for growth. The Council does not doubt that there are landowners willing to see building on their land. However the potential availability of land is far from the only issue to consider. The Green Belt review (suggested by the Inspector in his initial response dated 19 November 2012) will look beyond Dacorum's boundaries. The delivery of new development should relate to geography (the opportunities for sustainable development), and not simply the administrative district.</p>
			6	<p>Main modifications cannot be used to make an 'unsound' plan sound.</p>	<p>No change required. The Inspector provided his preliminary findings on 19 November 2012. The Inspector had not reached a conclusion on the soundness of the Core Strategy. He did however identify two concerns – the lack of a robust and comprehensive Green Belt review and the limited emphasis that appears to have been given to the role of neighbouring authorities in accommodating some of Dacorum's housing needs. More weight should have been attached to the potential role of east Hemel Hempstead in meeting the borough's housing needs more fully. The Inspector suggested alternative options that the Council could consider in the light of his concerns. One of those options was for the Council to undertake a partial review of the Core Strategy. MM28 outlines that approach.</p> <p>The Council considers that the Inspector is under an obligation to reach his own conclusion on whether the</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					<p>Core Strategy is sound. He can therefore find the Core Strategy sound as submitted.</p> <p>However if he finds an element that is unsound, he must either recommend non-adoption or, if satisfied that the duty to co-operate (with adjoining authorities and relevant others) has been complied with and if asked by the Council (as local planning authority), he must recommend modifications of the document in order to make it sound.</p> <p>The Council considers that it has satisfied the duty to co-operate in the preparation of the Core Strategy and that with MM28 and the undertaking of an early partial review to address the particular matters raised by the Inspector the Core Strategy is sound.</p> <p>What MM28 effectively does is to conclude that the issues which potentially go to soundness identified by the Inspector should not be left for the full plan period: they should be addressed further and as appropriate corrected.</p> <p>See also section 4 of Part 1 of the Report of Representations.</p>
			2	The need to release the local allocations earlier than currently planned.	<p>No change required. Also see responses to MM2 and MM3.</p> <p>The Local Allocations are not needed before 2021 on the basis of the Core Strategy housing target and the Council's estimates of housing land supply to meet that target (see Examination Document HG16 and the</p>

Ref	Policy / Paragraph	Main Modification	Number of Objections	Issue	Response
					Council's Response to Issue 6). However, monitoring may show that one or more Local Allocation needs to be brought forward earlier than planned. Policy CS3 sets out the criteria to be considered.
			1	What does a 'proactive monitoring system mean? Is it just the AMR?	<p>No change required. These questions are not objections to MM28 as such.</p> <p>The Council intends that its monitoring system (through Annual Monitoring Reports) should focus less on information and more on analysis and the success of policies: where policies are not working satisfactorily, the Council needs to be proactive and identify solutions. Examples are given in paragraph 14.15 for housing (see MM13)</p>
			1	The need for an overall review of the Core Strategy, rather than a partial review.	<p>No change required. The Inspector's preliminary findings (19 November 2012) show no concern with large parts of the Core Strategy. His concerns relate to two matters which are being addressed through MM28.</p> <p>The reasons and scope for review are limited: the Council assumes this is why the Inspector has termed it a partial review.</p> <p>The Council of course accepts that the partial review should be robust and that the evidence to support that will need to be sound.</p>

(b) Revocation of Regional Strategy

Note: This summary relates to comments made regarding the potential implications of the revocation of the Regional Strategy and the Council's response to these.

Issue	Number of comments	Response
Increased importance of engagement with adjoining local planning authorities and the need for the Core Strategy to recognise this.	3	The revocation of the regional Strategy (the East of England Plan) was signalled in May 2010 by the (new) Government. The regional strategy did not include a housing target for Dacorum. This was quashed following a High Court decision in 2009 which removed the proposals for major growth affecting the Green Belt at Hemel Hempstead. The Council
Increased importance of demonstrating how the plan meets NPPF requirements with regard to meeting the full objectively assessed needs of the borough and a thorough consideration of Green Belt boundaries.	3	reviewed the regional strategy as the Core Strategy was being prepared and included relevant elements of the policy from the regional strategy in the Core Strategy. Because of the 2-3 year lead in time, the actual revocation of the regional strategy has little significance. The real issue is the application of the National Planning Policy Framework and the challenge of sub-regional planning with neighbouring local authorities. The Council acknowledges the importance of engagement with adjoin local authorities. It has provided a robust 'Duty to Co-operate' Statement in support of the Core Strategy (Examination Document SUB8). MM28 recognises the need to review Green Belt boundaries with neighbours and the link this has with consideration of "full objectively assessed (development) needs."
The need to continue to take the evidence base developed for the Regional Strategy into account – particularly the role of Hemel Hempstead and adjoining Green Belt	2	The role of Hemel Hempstead, as a former Mark 1 New Town and by far the largest settlement in the Borough which is in need of regeneration, is widely acknowledged. It is the focus and main centre for development and change in the Borough.
Whether site LA6 (Chesham Road / Molyneaux Avenue, Bovington) can deliver the community infrastructure required in the village.	1	The evidence base for the regional strategy is largely out of date. The partial review of the Core Strategy identified in MM28 will require fresh evidence on key matters – including housing needs, the contribution of different parts of the Green belt to its overall function, and depending on the outcome, a fresh look at employment space needs and transport issues.
Whether Green Belt land should be used when there is more suitable land available.	1	The revocation of the regional strategy has no relevance to LA6 in the Council's opinion.

Table 4 – Suggested Changes to the Main Modifications

The following changes to the Main Modifications are put forward for consideration by the Inspector. The reasons for the changes are explained in Table 3.

Text subject to suggested change(s) is shown in **bold**.

Ref	Policy / Paragraph	Main Modification	Current Main Modification text	Suggested amended Main Modifications text
MM21	CS29	Criterion on biodiversity	<p>New development will comply with the highest standards of sustainable design and construction possible. The following principles should normally be satisfied:</p> <p>(a) Use building materials and timber from verified sustainable sources;</p> <p>(b) Minimise water consumption during construction;</p> <p>(c) Recycle and reduce construction waste which may otherwise go to landfill.</p> <p>(d) Provide an adequate means of water supply, surface water and foul drainage;</p> <p>(e) Plan to limit residential indoor water consumption to 105 litres per person per day until national statutory guidance supersedes this advice;</p> <p>(f) <u>Plan to minimise carbon dioxide emissions;</u></p>	<p>New development will comply with the highest standards of sustainable design and construction possible. The following principles should normally be satisfied:</p> <p>(a) Use building materials and timber from verified sustainable sources;</p> <p>(b) Minimise water consumption during construction;</p> <p>(c) Recycle and reduce construction waste which may otherwise go to landfill.</p> <p>(d) Provide an adequate means of water supply, surface water and foul drainage;</p> <p>(e) Plan to limit residential indoor water consumption to 105 litres per person per day until national statutory guidance supersedes this advice;</p> <p>(f) <u>Plan to minimise carbon dioxide emissions;</u></p>

Ref	Policy / Paragraph	Main Modification	Current Main Modification text	Suggested amended Main Modifications text
			<p>Comply with CO₂ reductions as per Table 11;</p> <p>(g) Maximise the energy efficiency performance of the building fabric, in accordance with the energy hierarchy set out in Figure 16;</p> <p>(h) Incorporate at least one new tree per dwelling/per 100sqm (for non residential developments) on-site;</p> <p>(i) <u>Minimise impacts on biodiversity and incorporate positive measures to support wildlife;</u></p> <p>(j) Minimise impermeable surfaces around the curtilage of buildings and in new street design;</p> <p>(k) Incorporate permeable and lighter coloured surfaces within urban areas; and</p> <p>(l) Provide on-site recycling facilities for waste.</p> <p>Buildings will be designed to have a long life and adaptable internal layout. Applicants will therefore need to explain how:</p> <p>(a) they have considered the whole life cycle of the building and how the materials could be recycled at the end of the building's life; and</p> <p>(b) their design has been 'future proofed' to enable retrofitting to meet tighter energy efficiency standards and connection to decentralised community heating systems.</p>	<p>Comply with CO₂ reductions as per Table 11;</p> <p>(g) Maximise the energy efficiency performance of the building fabric, in accordance with the energy hierarchy set out in Figure 16;</p> <p>(h) Incorporate at least one new tree per dwelling/per 100sqm (for non residential developments) on-site;</p> <p>(i) <u>Minimise impacts on biodiversity and incorporate positive measures to support wildlife;</u></p> <p>(j) Minimise impermeable surfaces around the curtilage of buildings and in new street design;</p> <p>(k) Incorporate permeable and lighter coloured surfaces within urban areas; and</p> <p>(l) Provide on-site recycling facilities for waste.</p> <p>Buildings will be designed to have a long life and adaptable internal layout. Applicants will therefore need to explain how:</p> <p>(a) they have considered the whole life cycle of the building and how the materials could be recycled at the end of the building's life; and</p> <p>(b) their design has been 'future proofed' to enable retrofitting to meet tighter energy efficiency standards and connection to decentralised community heating systems.</p>

Ref	Policy / Paragraph	Main Modification	Current Main Modification text	Suggested amended Main Modifications text
			<p>For specified types of development applicants should provide a Sustainability Statement.</p> <p><u>Where new development cannot meet on-site energy or tree planting requirements, the applicant will be expected to make an appropriate financial contribution towards the Sustainability Offset Fund.</u></p> <p>The principles in this policy may be relaxed if the a scheme would be unviable or there is not a technically feasible approach, the principles in this policy may be relaxed. Where new development cannot meet on-site energy or tree canopy requirements, the applicant will be expected to make an appropriate financial contribution towards the Sustainability Offset Fund.</p>	<p>For specified types of development applicants should provide a Sustainability Statement.</p> <p><u>Where new development cannot meet on-site energy or tree planting requirements, the applicant will be expected to contribute towards sustainability offsetting if at all possible (see Policy CS30).</u></p> <p>The principles in this policy may be relaxed if the a scheme would be unviable or there is not a technically feasible approach, the principles in this policy may be relaxed. Where new development cannot meet on-site energy or tree canopy requirements, the applicant will be expected to make an appropriate financial contribution towards the Sustainability Offset Fund.</p>

Ref	Policy / Paragraph	Main Modification	Current Main Modification text	Suggested amended Main Modifications text
MM24	CS33	New superstore	<p><i>Second paragraph</i></p> <p>The principles guiding development are to:</p> <ol style="list-style-type: none"> 1. use: <ul style="list-style-type: none"> (a) secure additional retail stores in the Marlowes Shopping Zone <u>including a new food store</u>; (b) deliver a mix of uses to support the prime retail function; (c) encourage an attractive evening economy along Waterhouse Street; (d) deliver a range of new homes; (e) create new offices; (f) deliver new leisure, education and cultural facilities, including a primary school and library; (g) keep a public sector presence; (h) restore the Water Gardens, and retain and create other public spaces; 2. movement: <ul style="list-style-type: none"> (a) secure an integrated public transport hub and circulation within the centre; (b) provide better east-west links, particularly for pedestrians; (c) continue the riverside walk from the Plough Zone to Gadebridge Park; (d) improve cycling provision; 	<p><i>Second paragraph</i></p> <p>The principles guiding development are to:</p> <ol style="list-style-type: none"> 1. use: <ul style="list-style-type: none"> (a) secure additional retail stores in the Marlowes Shopping Zone <u>and a new food store</u>; (b) deliver a mix of uses to support the prime retail function; (c) encourage an attractive evening economy along Waterhouse Street; (d) deliver a range of new homes; (e) create new offices; (f) deliver new leisure, education and cultural facilities, including a primary school and library; (g) keep a public sector presence; (h) restore the Water Gardens, and retain and create other public spaces; <p><i>Remainder of text as currently proposed.</i></p>

Ref	Policy / Paragraph	Main Modification	Current Main Modification text	Suggested amended Main Modifications text
			<p>3. design:</p> <ul style="list-style-type: none"> (a) emphasise pedestrian movement gateways through bold building design, height and landscaping; (b) provide active frontages; (c) apply a co-ordinated approach to building and streetscape design; (d) use high quality materials and public art to complement the existing palette of materials and features; (e) restore artwork and create new complementary pieces of art; and (f) deliver district heating and additional large-scale / high capacity renewable energy generation technologies. 	
MM28	New sub-section to Section 29	Partial review text	<p><u>29.8 The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs). Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully.</u></p>	<p><u>29.8 The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs). Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully.</u></p> <p><u>29.9 The Localism Act 2011 places a “duty to</u></p>

Ref	Policy / Paragraph	Main Modification	Current Main Modification text	Suggested amended Main Modifications text
			<p><u>29.9 The Localism Act 2011 places a “duty to co-operate” on local authorities and other specified organisations. Dacorum’s local planning framework should therefore be based on joint working and co-operation with neighbouring authorities to address larger than local issues. The obligation stretches from plan-making to implementation, and will be explained in successive Annual Monitoring Reports. The partial review of the Core Strategy will be undertaken in co-operation with neighbouring authorities, taking account of their progress with development plan documents.</u></p> <p><u>29.10 Through the partial review, the Council will assess:</u></p> <p><u>(a) household projections;</u></p> <p><u>(b) the role and function of the Green Belt affecting Dacorum, including long term boundaries and the potential to identify safeguarded land beyond 2031; and more significantly,</u></p> <p><u>(c) the role that effective co-operation with</u></p>	<p><u>co-operate” on local authorities and other specified organisations. Dacorum’s local planning framework should therefore be based on joint working and co-operation with neighbouring authorities to address larger than local issues. The obligation stretches from plan-making to implementation, and will be explained in successive Annual Monitoring Reports. The partial review of the Core Strategy will be undertaken in co-operation with neighbouring authorities, taking account of their progress with development plan documents.The Council will aim to adopt the review by 2017/18.</u></p> <p><u>29.10 Through the partial review, the Council will assess:</u></p> <p><u>(a) household projections;</u></p> <p><u>(b) the role and function of the Green Belt affecting Dacorum, including long term boundaries and the potential to identify safeguarded land beyond 2031; and more significantly,</u></p> <p><u>(c) the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum. This</u></p>

Ref	Policy / Paragraph	Main Modification	Current Main Modification text	Suggested amended Main Modifications text
			<p><u>local planning authorities could play in meeting any housing needs arising from Dacorum. This element will include St Albans district and relevant areas lying beyond the Green Belt.</u></p> <p><u>The outcome of the review cannot be prejudged.</u></p>	<p><u>element will include St Albans district and relevant areas lying beyond the Green Belt.</u></p> <p><u>The outcome of the review cannot be prejudged.</u></p>

Table 5 – Responses not considered in the Report of Representations

(a) List of those making No Comment

- Mr Richard Sears, British Film Institute.
- Mrs Sheila Pilkington

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

None.