

CORE STRATEGY REPORT OF REPRESENTATIONS

PART 2

Contains:

- Annex B: Results
 - Number of Representations
 - Main Issues raised
 - List of Council Minor Changes to the Core Strategy

SUBMISSION DOCUMENT June 2012 This publication is **Part 2 of the Report of Representations for the Pre-Submission Core Strategy:** it contains the results of consultation on the Pre-Submission Core Strategy and proposed minor changes to the Pre-Submission Core Strategy. Together, the minor changes and Pre-Submission draft make up the Core Strategy which the Council is submitting to the Planning Inspectorate for examination.

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

Obtaining this information in other formats

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

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

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Table 1: Number of Representations Considered

- The sum of the objections (columns 5 9) in each row does not necessarily equal the total objecting in column 4. An objector may give more than one reason for their objection.
 Representations recorded against a section heading relate to the *whole* of that section

(A) From the Main Consultation

Core Strategy Reference		1		Number of Repres	entations			
	Total received	Total in support	Total objecting			Objections		
					saying the co	re strategy is		commenting
				not legally compliant	not justified	not effective	inconsistent with national policy	
Foreword	3	1	2	2	_	_	_	2
1. Summary of the Strategy	6	4	2	0	-	_	-	2
Text	44	26	18	1	-	_	-	20
Key Diagram	2	-	2	0	2	2	1	-
Part A – Context							<u>'</u>	
2. Introduction	_	_						
Text	3	1	2	2	1	1	2	-
Figures 1 & 2	-	-	-	-		'		
3. Borough Portrait	1	-	1	0	1	-	1	-
Text	14	11	3	0	2	_	1	1
Figures 3 - 6	-	-	-	-				
4. Challenges	-	-	-					
Challenge 1	3	1	2	0	2	2	2	-
Challenge 2	-	-	-					
Challenge 3	2	1	1	0	-	1	-	-
Challenge 4	2	1	1	1	-	-	1	-
Challenge 5	3	1	2	0	-	2	-	-
Challenge 6	2	1	1	0	-	1	-	-
5. Borough Vision	8	3	5	1	3	5	3	-
6. Strategic Objectives	19	10	9	3	4	4	7	-
7. Other Plans	-	-	-					
Text	1	-	1	0	1	-	-	-
Figures 7 & 8	2	-	2	0	-	2	-	-
Part B – The Strategy								
The Sustainable Development Strategy	1							
Strategic Objectives *[combined figure]	*	-	1	0	-	1	-	-
8. Promoting sustainable development	3*	2	-					
Text: 8.1-6	6	5	1	0	-	1	-	-

Core Strategy Reference				Number of Repres	entations			
	Total received	Total in support	Total objecting			Objections		
					saying the c	ore strategy is		commenting
				not legally compliant	not justified	not effective	inconsistent with national policy	
Figures 9 & 10	-	-	-					
Distribution of Development: 8.7-12	4	1	3	0	3	-	-	-
Table 1	12	5	7	2	4	3	2	2
Policy CS1	27	15	12	2	4	6	4	3
Location & Management of Devt: 8.13-16	3	1	2	0	2	-	-	-
Policy CS2	25	15	10	2	7	5	6	-
Policy CS3	23	9	14	5	9	7	8	3
Towns & Large Villages: 8.17-20	-	-	-					
Policy CS4	8	3	5	1	1	3	2	1
The Countryside: 8.21-26	7	5	2	0	-	1	-	1
- Green Belt: 8.27-32	6	2	4	1	3	1	-	-
Table 2	2	2	-					
Policy CS5	21	7	14	3	7	6	8	2
- Selected small villages (GB):8.33-34	2	-	2	0	2	2	2	-
Policy CS6	6	2	4	0	2	3	2	-
- Rural Area:8.35-36	-	-	-					
Policy CS7	6	2	4	0	1	3	3	-
9. Enabling convenient access	-	-	-					
Text: 9.1-11	5	3	2	0	-	2	-	-
Table 3	-	-	-					
Policy CS8	8	4	4	0	1	3	-	1
Policy CS9	4	2	2	1	1	1	-	1
10. Securing quality design	-	-	-					
Text: 10.1-5	4	2	2	0				
Successful urban design: 10.6-9	1	1	-					
Figures 11-13	-	-	-					
Quality of the built environment: 10.10-14	-	-	-					
Policy CS10	5	3	2	0	-	1	-	1
Policy CS11	4	2	2	0	-	1	-	1
Policy CS12	4	2	2	0	-	2	-	-
Quality of the public realm: 10.15-20	-	-	-					
Policy CS13	4	1	3	0	-	3	-	-
Strengthening Economic Prosperity	1	,	,					
Strategic Objectives	1	-	1	1	1	1	1	-
11. Creating jobs and full employment	1	-	1	1	1	1	1	-
Text: 11.1-9	-	-	-					
Table 4	1	-	1	1	1	1	1	-
Low Carbon Economy: 11.10-13	1	-	1	0	-	1	-	-
Maylands Business Park: 11.14	-	-	-					

Core Strategy Reference				Number of Repres	sentations			
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					saying the c	ore strategy is		commenting
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Supporting tourism: 11.15-17	3	-	3	1	1	3	1	-
Policy CS14	8	4	4	1	2	4	2	1
12. Providing for offices, industry, etc	-	-	-					
Text: 12.1-4	1	-	1	0	-	1	-	-
Offices: 12.5-10	-	-	-					
Industry, storage etc: 12.11-13	-	-	-					
Policy CS15	6	2	4	2	1	2	1	2
13. Supporting retailing and commerce	-	-	-					
Text: 13.1	-	-	-					
Retail hierarchy: 13.2-4	2	1	1	0	-	-	-	1
Table 5	4	2	2	0	2	1	2	-
Shopping areas: 13.5-6	1	-	1	0	-	1	1	-
Out of centre retail development: 13.7-12	2	-	2	0	-	1	1	1
Table 6	3	-	3	0	1	-	1	2
Policy CS16	5	1	4	0	1	2	3	1
Providing Homes and Community Services			•					
Strategic Objectives	1	-	1	1	1	1	1	-
14. Providing homes	1	-	1	1	1	1	1	-
Text: 14.1-8	2	1	1	0	1	-	-	-
Housing supply: 14.9-23	24	13	11	2	5	5	-	1
Table 7	-	-	-					
Table 8	10	-	10	2	7	4	6	-
Table 9	23	-	23	9	12	7	10	8
Policy CS17	33	5	28	7	17	13	14	4
Housing mix: 14.24-30	1	1	-					
Policy CS18	8	4	4	1	3	1	3	1
Affordable housing: 14.31-38	3	1	2	1	1	1	1	1
Policy CS19	14	4	10	3	5	6	4	2
Policy CS20	1	1	-					
Travelling communities: 14.39-46	-	-	-					
Table 10	-	-	-					
Policy CS21	-	-	-					
Policy CS22	3	1	2	2	1	2	1	-
15. Meeting community needs	8	-	8	3	7	-	-	1
Delivering community services: 15.1-17	13	10	3	0	2	1	1	-
Figure 14	1	-	1	0	-	-	-	1
Delivering leisure facilities: 15.18-25	1	-	8	0	4	4	1	1
Policy CS23	14	5	9	3	6	4	3	1
Looking after the Environment	•		•					

Core Strategy Reference				Number of Repres	entations			
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					saying the c	ore strategy is		commenting
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Strategic Objectives	1	-	1	0	-	1	-	-
16. Enhancing the natural environment	2	1	1	0	-	-	-	1
Text: 16.1	1	1	-					
Protecting/improving the landscape ¹	7	3	4	2	-	3	-	1
Map 2	1	-	1	0				
Green infrastructure ¹	16	11	5	0	-	4	-	1
Map 3	5	-	5	2	1	2	2	2
Biodiversity/geological conservation ¹	14	3	11	0	-	9	-	2
Figure 15	1	-	1	0	-	1	-	-
Policy CS24	3	2	1	0	-	-	1	-
Policy CS25	2	1	1	0	-	1	-	-
Policy CS26	6	3	3	1	1	-	-	2
17. Conserving the historic environment	2	2	-					
Text: 17.1-17	1	-	1	0	-	1	-	-
Policy CS27	5	2	3	1	1	-	1	1
18. Using resources efficiently	2	2	-					
Text: 18.1-11	6	5	1	1	1	-	-	-
Figure 16	-	-	-					
Renewable energy: 18.12-18	8	7	1	0	1	-	-	-
Map 4	1	1	-					
Table 11	3	-	3	0	3	3	3	-
Sustainable design/construction:18.19-26	16	10	6	3	1	4	-	1
Policy CS28	7	1	6	0	4	5	4	1
Policy CS29	14	3	11	0	4	7	4	2
Policy CS30	3	-	3	2	2	1	1	1
Sustainable resource managem't:18.27-41	30	23	7	2	1	4	-	2
Policy CS31	7	5	2	0	-	1	1	-
Policy CS32	6	3	3	1	1	2	-	-
Place Strategies								
19. Introduction to Place Strategies	1	1	-					
Text	2	1	1	0				
Common Local Objectives	3	1	2	0				
20. Hemel Hempstead	9	4	5	2	4	1	1	1
Context:20.1-5	3	1	2	0	-	-	-	-
The Visions	4	1	3	0	-	-	-	3
Local Objectives	-	-	-					
Delivering the town strategy: 20.6-11	3	-	3	1	2	2	2	1
Delivering the town centre: 20.12-13	3	1	2	0	-	-	-	2
Figure 17	5	2	3	0	1	-	1	2

Core Strategy Reference					Number of Repres	sentations			
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							ore strategy is		commenting
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Delivering East Hemel: 20.14-19		2	0	2	0	-	1	-	1
Figure 18		4	1	3	0	1	2	1	1
Policy CS33		7	2	5	1	-	1	1	3
Policy CS34		10	5	5	2	2	1	2	2
Proposal LA1		20	1	19	2	3	-	16	1
Proposal LA2		41	0	41	29	29	9	16	1
Proposal LA3		11	6	5	2	2	-	2	2
Figure 19: vision - built		4	0	4	1	2	2	3	1
Figure 20: vision - natural		4	0	4	2	1	1	1	1
Figure 21: the town centre		1	0	1	0	-	-	-	1
Figure 22: East Hemel		2	0	2	0	-	1	-	1
21. Berkhamsted		5	1	4	2	2	1	2	1
Context: 21.1	* [combined figure]	8*	1	1	1	-	-	-	1
The Vision		*	1	-					
Local Objectives		*	-	5	1	3	2	1	1
Delivering the Vision: 21.2-14		51	16	35	10	20	12	13	4
Strategic Site SS1		17	1	16	2	9	8	2	1
Proposal LA4		7	1	6	1	4	2	2	1
Vision Diagram (Fig 23)		8	2	6	2	4	2	1	1
22. Tring		11	1	10	5	8	-	-	2
Context: 22.1-2	* [combined figure]	5*	-	-					
The Vision		*	-	2	0	-	2	-	-
Local Objectives		*	-	3	1	-	1	1	1
Delivering the Vision: 22.3-9		20	-	20	8	2	12	3	4
Proposal LA5		20	2	18	4	7	7	8	3
Vision Diagram (Fig 24)		3	-	3	1	-	2	1	1
23. Kings Langley		3	1	2	0	1	1	-	-
Context: 23.1	* [combined figure]	3*	-	-					
The Vision		*	-	1	0	-	1	-	-
Local Objectives		*	-	2	1	-	1	-	1
Delivering the Vision: 23.2-6		1	-	1	1	-	-	-	1
Vision Diagram (Fig 25)		-	-	-					
24. Bovingdon		3	1	2	0	2	1	-	-
Context: 24.1	* [combined figure]	6*	-	-					
The Vision		*	1	-					
Local Objectives		*	-	5	3	5	3	-	-
Delivering the Vision: 24.2-5		13	-	13	10	11	9	-	2
Proposal LA6		8	1	7	3	5	6	1	1
Vision Diagram (Fig 26)		1	1	-					

Core Strategy Reference					Number of Repres	entations			
		Total received	Total in support	Total objecting			Objections		
						saying the co	ore strategy is		commenting
					not legally compliant	not justified	not effective	inconsistent with national policy	
25. Markyate		4	2	2	1	1	-	-	1
Context: 25.1-4	* [combined figure]	4*	-	-					
The Vision		*	1	2	0	-	2	1	-
Local Objectives		*	-	1	0	-	1	1	-
Delivering the Vision: 25.5-10		1	-	1	0	-	1	1	-
Strategic Site SS2		4	1	3	0	1	1	1	1
Vision Diagram (Fig 27)		2	-	2	0	-	1	1	1
26. Countryside		4	2	2	1	1	1	1	1
Context: 26.1-3	* [combined figure]	3*	1	-					
The Vision		*	-	-					
Local Objectives		*	1	1	0	-	1	-	1
Delivering the Vision: 26.4-18		3	1	2	0	1	2	1	-
Table 12		1	-	1	0	-	1	-	-
Vision Diagram (Fig 28)		1	-	1	0	-	1	-	-
Part C - Implementation and Delive	ery								
Strategic Objectives		-	-	-					
27. Delivery		1	1	-					
Text: 27.1-4		-	-	-					
Partnership Working: 27.5-8		-	-	-					
Key Projects: 27.9-10		-	-	-					
Flexibility & contingency: 27.11-14		4	4	-					
28. Infrastructure		-	-	-					
Text: 28.1-2		3	3	-					
Infrastructure requirements: 28.3-6		4	2	2	0	-	1	-	1
Developer contributions: 28.7-11		6	6	-					
Policy CS35		8	3	5	1	1	2	1	3
29. Monitoring		-	-	-					
Text		-	-	-					
Part D – Appendices									
1. Superseded Policies		-	-	-					
2. Housing Trajectory		2	-	2	1	2	2	2	-
3. Delivery Mechanisms		1	-	1	0	-	1	-	-
4. Glossary		1	-	1	0	-	1	-	-
Proposals Map									
General (including omissions)		-	-	-					
SS1: Shootersway		-	-	-					
SS2: Hicks Road		-	-	-					
Hemel Hempstead Town Centre		-	-	-					
East Hemel Hempstead Area Action	n Plan	_	-	-					

Core Strategy Reference		Number of Representations									
	Total received	Total in support	Total objecting	Objections							
					commenting						
				not legally compliant	not justified	not effective	inconsistent with national policy				
Conservation Areas	-	-	-								
Trunk Roads	-	-	-								
TOTAL	1,081	388	693	186	305	306	224	146			

Note: 1 Paragraph numbers are not shown. There is a discrepancy between numbers in the Council's consultation database and the printed version of the Core Strategy (which is not relevant here).

(B) From the Omissions Consultation

Number of Representations										
Total received	Total in support	Total objecting	Objections							
				saying the d	ore strategy is		commenting			
			not legally compliant	not justified	not effective	inconsistent with national policy				
1	-	1	1	1	1	1				
4	3	1	0	1						
2	-	2	1	1	1	1				
-	-	-								
1	1	-								
2	2	-								
1	-	1	0		1					
1	1	-								
1	1	-								
13	8	5	2	3	3	2	-			
	1 4 2 - 1 1 1 1 1 1	received 1 - 4 3 2 1 1 1 2 2 2 1 1 1 1 1 1	received objecting objecti	Total received Total in support Total objecting 1 - 1 <td> Total received Total objecting Saying the control object</td> <td> Total received Total in support received Total objecting Saying the core strategy is not legally compliant not justified not effective </td> <td> Total received Total objecting</td>	Total received Total objecting Saying the control object	Total received Total in support received Total objecting Saying the core strategy is not legally compliant not justified not effective	Total received Total objecting			

Total for complete consultation	1,094	396	698	188	308	309	226	146

Table 2: Main Issues raised

Table 2a: Main Issues raised - Part A - Context (Main Consultation)

Notes:	Nature of the Issue		Issue previously raised
			New Issue
		S	Significant New Issue

Nature of the Amendment

MC Minor Change (excluding editorial changes here) See Table 3

SC Significant Change None recommended

The column headed – Nature of the Issue – is intended for internal use by Dacorum Council.

New issue - i.e. it has not been raised in any comparable form before.

Significant issue: i.e. one which substantively challenges the direction, meaning or intention of a policy or proposal in the Core Strategy.

The remaining information is important for the Examination into the Core Strategy.

Amendments: the Council considered whether it thought changes were minor or significant.

Significant change: i.e. a substantive change to the direction, intention or meaning of a policy in the Core Strategy, requiring general public consultation before submission of the Core Strategy to the Secretary of State: the clarification, correction or postponing of the detail of policy to a later stage have not been construed as being significant changes.

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Foreword	2	The level of housing proposed will cause water supply issues.		No change. This issue is sufficiently covered by Policies CS29 and CS31.	
		The level of housing proposed will increase carbon emissions and air pollution.		No change to the Foreword. Policies CS28 to CS30 and CS32 seek to minimise these impacts. However a reference to carbon emission reductions in Objective 13 would be helpful.	MC6
		Loss of biodiversity through Green Belt development		No change. Biodiversity issues have been considered when choosing Local Allocations. Application of policies in Section 16 – Enhancing the natural environment will mitigate any impacts.	
		Lack of reference to renewable technologies.		No change. The issue of renewable technology is adequately covered in Sections 11 and 18.	
		Emphasise local food production and distribution, and the need for crops to be free from genetic modification.		No change to the Foreword. Reference to sourcing food locally is already included: a further reference will be added to the Borough Vision.	MC5
1. Summary of the Strategy	2	The level of new homes proposed is not compatible with maintaining quality of life in small market towns.		No change. The Strategy maintains an appropriate balance between new development and protection of local character, through Policies CS1, 2 and 10-13 and the Place Strategies.	
		Give priority to one-off (smaller scale) development over mass development.		No change. Development opportunities may be smaller or larger. What will be appropriate varies according to location and scale of need. Design policies will help ensure	

Core Strategy Reference)	Number of Objections	Issue	Nature of the Issue	Response	Amendment
					development sits with local character, whatever its scale.	
			Complexity of the consultation processes and need for an independent inquiry where the interest of local people are properly represented.		No change. Council has followed national regulations, Government advice and consultation policy in its Statement of Community Involvement. The process of examination allows for independent review and different views to be considered.	
			The Borough Vision should be more ambitious.		No change. The Vision strikes a realistic balance between ambition and delivery.	
Text 1.1-22	1.2	1	The Plan does not sufficiently reflect 'sustainable development' as a key driver		No change. The principles of sustainable development are explained in Section 8 and sufficiently articulated throughout the Core Strategy.	
	1.4	3	A lower housing option should be included to avoid contradictions between housing level and other requirements of the strategy.		No change. The housing target and strategy as a whole strike an appropriate balance between social, economic and environmental considerations.	
			The proposed level of new homes is not considered sustainable.		No change. The housing target strikes an appropriate balance between social, economic and environmental considerations.	
			Water supply is not sufficient to support the proposed number of new homes.		No change. The Council is closely liaising with the water undertaker and advisers. The Infrastructure Delivery Plan will identify when and where new infrastructure upgrades will be provided to deal with demands. The IDP will be updated regularly. Policy CS29 will control water consumption arising from new development.	
			How will flows in chalk streams be improved?		No change. Improvements will be delivered through the application of Policies CS29 and CS31 and through the work of partner organisations.	
			Use brownfield land before Green Belt sites for housing.		No change. Policy CS2 gives priority to the use of brownfield land and greenfield sites which are not within the Green Belt.	
	1.10	3	There is no reference to the need for a heritage centre / museum for Hemel Hempstead		No change. Cultural facilities are appropriately referred to In Section 15 and Policy CS23.	
			Delete all proposals that would involve a redesignation of Green Belt land for housing. Specific concerns were raised in respect of the proposed local allocation at West Hemel Hempstead: • The extent of the proposed Green Belt release • The loss of a valuable 'green lung' for the town. • The impact on Shrubhill Common LNR • The impact on area's footpath network and informal recreational		No change to this paragraph. Green Belt releases are required in order to provide for future local housing needs. Key development requirements for each of the local allocations are set out in the relevant Place Strategy. For West Hemel Hempstead this includes reference to creating a soft edge to the Green Belt; to the provision of additional open space; improving pedestrian linkages; new strategic	
			 space. Visual and landscape impact of development. The potential for increased pressure for a northern bypass. Poor performance against sustainability criteria in Sustainability Appraisal Report 		landscaping to mitigate visual impact and the extension of Shrubhill Common Nature Reserve. Detailed design and layout issues will be considered through site master plans. Site boundaries will be defined in the Site Allocations DPD. Figure 20 will be amended to show Shrubhill Common LNR. Also see also response to LA3.	
	1.11	4	Lack of reference to provision of basic community needs, especially places of worship.		No change. The paragraph refers generally to community facilities, which can include places of worship (as set out in	

Core Strategy Reference	Number of	Issue	Nature of the Issue	Response	Amendment reference
				Figure 14). Policy CS23 seeks both the retention of existing social infrastructure and the provision of new facilities.	
		Lack of reference to cultural facilities, especially any replacement for the Pavilion in Hemel Hempstead.		No change. The paragraph is intended as a summary of the strategy. Appropriate detail regarding new cultural and leisure facilities is covered in Section 15 and elsewhere.	
		Provide further information on the range of facilities the proposed new sports ground will support.		No change. The precise nature of the new facility has yet to be established. Refer to background technical study for information about its potential size and nature.	
		Explain the meaning of 'General Hospital' and the need for this hospital to provide an appropriate range of services.		No change. The Council has used the official term provided by the local Hospital Trust. The range of services provided at the hospital is a matter for the Trust.	
		Refer to the findings of the Two Waters and Station Gateway studies.		No change. These are background technical studies that will be used to help guide detailed development / redevelopment proposals in the Two Waters area. The Core Strategy provides an appropriate planning framework to guide any such development.	
	1.13 5	The need for additional indoor sports facilities in Berkhamsted and especially Tring is not identified.		No change. The Place Strategies identify new needs rather than refurbishment or replacement. Known proposals and specific requirements will be identified in the Site Allocations DPD.	
		State the sports that will use the new playing pitches proposed for Berkhamsted.		No change. This will be a matter for the site owners and managers and will depend on particular need/demand which may vary over time.	
		New sports facilities at Tring School should be available for public use.		Policy CS23 promotes the dual use of new and existing facilities.	
		Reduce the level of new development proposed for Berkhamsted to between 750 and 1,000 and avoid: undue pressure on local infrastructure (particularly water and sewerage) adverse environmental impact due to loss of Green Belt; and increased car usage and congestion.		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. Also see responses under paragraph 21.2.	
		The density of development proposed on Egerton Rothesay School site (SS1) is too high. Delete reference to Hanburys (LA4).		No change. It is important that effective use is made of land within the urban area, commensurate with its location and surroundings. The context is different from the Local Plan in that more homes are needed over a longer time period. The Council has considered a figure up to 240/250 (Emerging Core Strategy) and in the light of consultation and further consideration has reduced it. An increase of 80 homes on the Local Plan is considered reasonable: more open space will be provided. Also see response to Figure 23 (Berkhamsted Place Strategy) relating to urban design zones. No change. Local allocations are needed to meet the	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					housing target. The inclusion of Hanburys is required to help meet local housing needs arising within Berkhamsted.	
	1.14	1	Does Markyate need more sports facilities?		No change. The level of growth at Markyate is modest. The level of facilities is generally appropriate to the village, but any specific needs can be considered further through Site Allocations DPD.	
	1.16	1	Refer to the need to conserve and enhance the natural beauty of the AONB.		Although no change is needed to this paragraph, the Council acknowledges that it has a role to conserve and enhance the natural beauty of the AONB. Policy CS25 is aimed at achieving this. The role and responsibilities of the Council and the Chilterns Conservation Board will be explained in the glossary.	
	1.20	1	Lack of reference to a cultural centre for the Borough		No change. Local objectives for Hemel Hempstead include reference to new cultural facilities in the town centre.	
			Protect historic buildings, such as Ashlyns School, in accordance with 1990 Planning (Listed Buildings and Conservation) Act.		No change. Existing policies accord this protection.	
	1.21	1	The Community infrastructure levy (CIL) and other developer contributions should be set at a realistic level and used to meet specific infrastructure needs.		No change. These matters will be fully considered when drawing up charging schedules, setting CIL and considering development costs and viability in general. Expenditure from financial contributions will be directed towards areas of greatest need.	
Key Diagram	1	2	Amend the key to refer to refer to 'Centre for Regeneration and Change' rather than 'Main Centre for Development and Change'; and distinguish between large and small market towns.	S	No change. The proposed terminology accurately reflects the future role of the Borough's three towns. The supporting text provides appropriate explanation.	
			Amend the Green Belt boundary, showing the removal of the local allocations.		No change. Green Belt boundaries will be amended through the Site Allocations DPD to reflect the approach set out in Policies CS2 and CS3.	
Part A - Context		-				
2. Introduction Text: 2.1-13	2.1	1	Is the policy approach consistent with current national policy?		No change. The Council applies national policy to Dacorum, taking into account local circumstances. The Examination into the Core Strategy will consider the soundness of the Council's policies and their relationship to national policy.	
	2.2	1	The level of new homes is too high and should be reduced to 9,835 and LA4 (Hanburys) removed		No change. The housing target strikes an appropriate balance between social, economic and environmental considerations. Local allocations are needed to meet the housing target. The inclusion of Hanburys is required to help meet local housing needs arising within Berkhamsted.	
Figures 1 & 2 3. Borough Portrait		1	Para 3 of the vision is too restrictive in terms of housing provision at Hemel Hempstead.		No change. The level of new homes proposed for the town is appropriate when considered in the context of the settlement hierarchy, land availability, housing needs and demands and delivery of community benefits.	
Text: 3.1-22	3.5	1	Refer to the Chilterns AONB.		demands and delivery of community benefits. No change. The extent of the AONB is adequately covered in paragraph 3.21 of the Borough Portrait and elsewhere (e.g. Map 1).	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
	3.12	1	Reference to 'self containment' should be elaborated to reflect a high level of out-commuting (to work) from Berkhamsted.		No change. This is a Borough Portrait and the current text adequately summarises the borough-level picture.	
	3.22	2	Remove the reference to white clawed crayfish as these are now extinct within the county.		Agree.	MC2
			Amend text to include reference to:		A reference will be made to sites of wildlife interest in the borough. Further reference to Berkhamsted Castle is more appropriately made in the Berkhamsted Place Strategy.	MC2 MC82 MC83
Figures 3 - 6		-				
4. Challenges		-				
Challenge 1	4.2	2	Include an explicit commitment to provide better social infrastructure. Refer to meeting the needs generated within the Borough in Challenge 1, and others only as identified by the other challenges		No change. Social infrastructure is covered in Challenge 4. No change. The level of development proposed in the Core Strategy addresses all the challenges specified. It does not, nor should not, automatically mean that every one is met in full. In-migration must be recognised as a challenge, even if the housing demands it brings cannot reasonably be met for environmental and other factors.	
Challenge 2		-				
Challenge 3	4.5	1	Refer to culture and the need for a strategic plan for the centre of Hemel Hempstead.		No change. Culture is referred to in Challenge 4. A town centre master plan is being prepared in accordance with the framework set out in the Hemel Hempstead Place Strategy.	
Challenge 4	4.6	1	Include measurable targets for social, leisure and cultural facilities and be aspirational.		No change. Targets relating to social infrastructure are included under Policy CS23. Detailed standards for provision are more appropriate to supporting policy.	
Challenge 5	4.7	2	Emphasise careful land management that is supportive of traditional farming, forestry and food production and refer to the fact that the sources of challenge are greater than climate change and population growth		No change to the challenge regarding land management, which provides an appropriate summary of the issue. However, add reference to the impact of development pressure. Land management is elaborated elsewhere (especially in Sections 16 and 26).	MC3
			Refer to water supply.		No change. Water is covered by the reference to natural resources.	
Challenge 6	4.8	1	Refer to mitigation and adaptation in the context of climate change. Also refer to the other benefits of sustainable design and construction in Section 18.		Agree in part: refer to adaptation as well as mitigation. Other, suggested cross-references are not necessary.	MC4
5. Borough Vision	1.1	5*				
[* objections for water Text: 5.1-2	5.1		Lack of reference to the global context for sustainable development.		No change. This is adequately covered in the introduction to the Sustainable Development Strategy in Section 8.	
			Include reference to local food production in the vision.		Agree.	MC5
			How can the vision be delivered if the Council does not have responsibility for all of the areas referred to?		No change. The importance of joint working with partner organisations is recognised throughout the strategy.	
			Lack of reference to the need for new social and community infrastructure.		No change. Adequate reference is made to this issue within the vision and reflected throughout the strategy.	
Vision	,		Does the vision appropriately cover the relative roles of the three towns - a) Hemel Hempstead meeting both need and demand for new		No change. The vision clearly reflects the settlement hierarchy set out in Table 1. This is considered to	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		homes; b) the sustainability of Green Belt releases at Hemel Hempstead; c) the role of Berkhamsted as a location for locating strategic growth; d) the need for greater differentiation between the roles of Berkhamsted and Tring?		appropriately reflect the size, character, capacity and constraints of the Borough's towns. Also see the responses to issues raised under Table 1 and Policy CS1.	
6. Strategic Objectives [* objections for whole of Section]	9*	Lack of a specific objective relating to local food production.		No change. The strategic objectives are appropriate. Local food production is effectively covered by a number of strategic objectives – for example, by reference to rural enterprise, function of the countryside and leisure facilities. There are also references elsewhere to the specific principles of growing, processing and selling (food) locally.	
		The Strategic Objectives do not meet the vision set out for Berkhamsted as the level of planned new homes is insufficient.	S	No change. Strategic Objectives support the Borough Vision as written. The role of Berkhamsted supports that.	
Text: 6.1-2	-				
Objective 1	-				
Objective 2		Refer to: - reduction of greenhouse gas emissions; - reducing pressure on the environment, protecting biodiversity and reducing water stress; - mitigation of and adaptation to the impacts of climate change.	S	No change to Objective 2. Reference to carbon emission reduction is appropriate under Objective 13. When the strategic objectives are then read as a whole, all of the issues raised are covered.	MC6
Objective 3	-				
Objective 4	-				
Objective 5	-				
Objective 6	-				
Objective 7	-				
Objective 8	-				
Objective 9		Replace 'vibrant' with sustainable (and prosperous economy).		No change. Seeking a vibrant economy is not incompatible with the principles of sustainability.	
		Balance the pursuit of economic objectives with quality of life objectives.		The strategy aims to strike an appropriate balance between social, economic and environmental objectives. No change.	
		Replace 'maintain' with extend (commercial enterprise and employment opportunities in market towns and large villages).		No change. Existing wording appropriately reflects strategy. Whilst some intensification and small scale expansion of these activities is possible in the market towns and large villages, the majority of growth is expected to be at Hemel Hempstead.	
Objective 10		Amend in order to acknowledge and meet the shortfall in housing provision: i.e. to provide sufficient housing to meet the future needs of the Borough.		No change. The existing wording appropriately reflects the vision and strategy.	
Objective 11	-				
Objective 12		Reword to refer to the need to 'conserve and enhance'		No change. The strategic objective relates to wider issues than the AONB. However, the Council acknowledges that it and other organisations have a role and responsibility to conserve and enhance the natural beauty of the AONB. Also see response to paragraph 1.16, proposing a minor change to the glossary.	MC103

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
Objective 13	-				
Objective 14	-				
Objective 15		Wording needs to be strengthened to refer to a reduction in both the absolute levels of pollution and its effects on people and the environment.		No change. The wording sufficiently covers both impacts.	
Objective 16	-				
Objective 17	-				
7. Other Plans	-				
Text: 7.1-4 7.4	1	Lack of reference to tourism within the wider document.		No change. Tourism is adequately referred to elsewhere, with the detail more appropriate to supplementary policies.	
Figure 7	1	Refer to the Hertfordshire Green Infrastructure Plan and Dacorum Borough Green Infrastructure Plan		The former is an appropriate additional reference. Policy CS26 refers to the latter being adopted as additional guidance. Reference to the National Planning Policy Framework would also be appropriate.	MC7
Figure 8	1	Add Policy CS23 to the list of relevant Core Strategy policies influencing crime reduction.		Agree.	MC8

Table 2a: Main Issues raised - Part B (Main Consultation)

- Sustainable Development Strategy

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
Part B – The Strategy		-				
The Sustainable Development Strate	gy	-				
Strategic Objectives		1	Add strategic objective to ensure sufficient housing is developed to meet the borough's housing requirement.		No change. The appropriate strategic objectives are included and the principles of sustainable development introduced in paragraphs 8.1-8.6. The strategic objectives give the direction for the policies that follow. A strategic housing objective (rather than a sustainable development objective) is included under 'Providing Homes and Community Services'.	
8. Promoting sustainable developme	nt	-				
Text: 8.1-6	8.6	1	Does the consideration of sustainability concentrate too much on carbon emission reductions and climate change mitigation to the detriment of other matters, such as the protection and enhancement of ecosystems?		No change. Paragraphs 8.1-8.6 introduce sustainability in the round. The approach is expanded throughout the Core Strategy and ecology/biodiversity is covered extensively, including in Section 16 and in Section 18 (and further minor changes have been made there).	
Figures 9 & 10		-			-	
Distribution of Development: 8.7-12	8.7	3	Should settlements be allowed to adapt and grow?		No change. In general, new investment should be allowed to provide for the needs of the borough and individual settlements. This means new community facilities, services, homes and workplaces. Declining average household size implies a need for new dwellings to maintain population and provide the lifeblood for communities. Quality of life is in part related to prosperity. As new businesses grow they need more space. Shops and facilities close without sufficient custom. The Council considers that the real issue is not about adaptation and growth but the scale and pace of change. Policy CS1 and Table 1 in particular provide a strategic overview of that change, and they guide development to the more appropriate places. In reality the developed area or building footprint of all towns and villages grows a little.	
Table 1		7	Define Hemel Hempstead as a centre for Regeneration and Change.	S	No change. Hemel Hempstead is appropriately defined. The term, 'Development and Change', which the Council has used, derives from the Regional Spatial Strategy. Hemel Hempstead is the focus for new development in the borough: this can be clarified by a minor wording change in Policy CS1. It is also acknowledged that the regeneration of two key areas in the town is an important policy ambition. The role of Hemel Hempstead as a New Town dominates the settlement hierarchy. In comparison, all other settlements in the borough have grown organically and, being smaller, are more obviously set in countryside.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Facilitate mixed use at Hemel Hempstead. Should there be greater differentiation between Berkhamsted (large market town) and Tring (small market town)? [Berkhamsted would be a location for housing/employment growth and regeneration, with a strategic new development to the south of the town.]		No change. The table is appropriately worded. Mixed use can be appropriate anywhere. No change. Berkhamsted and Tring are both towns, located within the Green Belt and adjoined by the Chilterns AONB. They are of different sizes, and will naturally accommodate different levels of development. There are constraints on outward expansion because of local infrastructure, character of the towns and their surroundings. In terms of a broad hierarchy the difference in scale between each market town is not that located. The constraints for general development in	
		Should there be greater differentiation between the market towns (areas of moderate growth) and large villages (areas of modest growth)?		is not that large. The opportunity for general development is more limited in these places compared to Hemel Hempstead. No change. The large villages are surrounded by Green Belt and/or the Chilterns AONB. The large villages are different in size to the market towns, and will naturally accommodate different levels of development to them. There are constraints on outward expansion because of local infrastructure, character of the towns and their surroundings. In terms of a broad hierarchy the difference in scale between the large villages and market towns is not that large. The opportunity for general development is more limited in all	
		Alternatively, should all market towns and large villages accommodate their own natural growth, plus that for the rural settlements they serve?	S	these places compared to Hemel Hempstead. No change. All these settlements have planning constraints: it would be inappropriate to provide for the significantly higher rates of development which accommodation of natural growth would imply. Also see above responses.	
		Refer to the strategic site at Berkhamsted.		No change. The table is appropriately worded and the strategic sites referred to sufficiently in the Core Strategy – in particular Sections 14 (Housing) and 21 (Berkhamsted Place Strategy).	
		Refer to the small villages as the least sustainable locations for new development (i.e. other than local needs).		No change. In the context of accommodating general development, which is what the table and Policy CS1 guide, the small villages are the least sustainable locations.	
Policy CS1	12	Should Berkhamsted be identified as an area of strategic development opportunity (allowing the town to meet its own development needs and expand to the south)?		No change. The scale of development suggested through representations about land south of Berkhamsted is considered excessive and with significant impacts (for example on a large area of the town's Green Belt hinterland). The scale of development is not needed at Berkhamsted and not needed to meet the Core Strategy housing target.	
		Should the scale of development at Tring be increased (from 4%) to 10% of the housing target?	S	No change. The scale of development suggested is not needed at Tring and not needed to meet the Core Strategy housing target.	
		Should Berkhamsted and Tring be more clearly distinguished, and/or the market towns be more clearly distinguished from the large villages?		No change. Berkhamsted and Tring are both towns, located within the Green Belt and adjoined by the Chilterns AONB. They are of different sizes, and will naturally accommodate different levels of development. The large villages are surrounded by Green Belt and/or the Chilterns AONB. The	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				large villages are different in size to the market towns, and will naturally accommodate different levels of development to them. There are constraints on outward expansion of all these settlements because of local infrastructure, their character and their surroundings. In terms of a broad hierarchy the difference in scale between the large villages and market towns is not that large. The opportunity for general development is more limited in all these places compared to Hemel Hempstead, and given the clear focus on Hemel Hempstead there is no reason why the general approach to the market towns and large villages should not be similar.	
		Add criterion to Hemel Hempstead to encourage mixed use.		No change. The policy is appropriately worded. Mixed use can be appropriate anywhere. Mixed use is generally referred to in Policy CS4.	
		Define neighbourhood concept (criterion i). Refer to necessary infrastructure (criterion ii).		It is defined in the Glossary. No change. No change. Development should provide or contribute to the provision of its own infrastructure needs. A minor wording change can make that clear. The word, necessary, would be superfluous. Contributions to infrastructure will be guided by Policy CS35 and subordinate guidance, itself according with Government advice.	MC9
		Amend criterion (a) for market towns and large villages: each should accommodate the natural growth of its town population and those of the surrounding settlement(s) each serves.	S	No change. The amended wording would have the effect of increasing the level of development at many settlements, contrary to the preferred settlement hierarchy and long standing policy (whereby development is focused at Hemel Hempstead).	
		Amend criterion (d) for market towns and large villages: refer to the Chilterns Area of Outstanding Natural Beauty.		No change. The AONB is covered by criterion (c) relating to the character of the adjoining countryside. Criterion (d) refers to the uses and functions controlled by Green Belt and Rural Area policy.	
		Does the policy prevent the development of a small site for housing at: - Kings Langley; or - Chipperfield?		General development is inappropriate in the Green Belt, and so the policy discourages this. However, it would be reasonable to consider the appropriateness of development of small sites through the Site Allocations DPD.	
Monitoring/Delivery					
Location & Management of Devt: 8.13-16 8.14	2	Changes to settlement boundaries involving Green Belt land should not be supported.		No change. Some is necessary to meet the Core Strategy's housing target.	
Policy CS2	10	Should the policy be deleted or amended to give greater flexibility and emphasis to meeting housing demand?		No change. The policy is relevant whether the housing target is higher or lower. The policy provides a logical approach for selection of development sites in accordance with sustainability principles. The current Local Plan includes a similar approach for a lower annual housing target.	
		Should the policy be more flexibly worded to allow Green Belt sites (B in the policy) to come forward earlier than sites in settlements (A), or stronger to ensure Green Belt sites are the last resort?		No change. The policy is appropriately worded. The supply of development sites includes greenfield land within settlements (A in the policy). It is only the local allocations –	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				hitherto Green Belt land - that are being held back to help manage the housing supply and ensure housing is provided together with relevant infrastructure. The local allocations will be defined through the Site Allocations DPD and are not needed to come forward at present. The Council also wishes to ensure that sufficient encouragement is given to regeneration opportunities.	
		Should any sequencing be removed or limited to greenfield sites around Hemel Hempstead?	S	No change. See above responses.	
		More than one local allocation can be justified at Tring.		No change. Tring is a constrained location, for which the Council has carefully balanced considerations of housing need against various impacts. A second local allocation is not needed to meet the town's housing objective or borough housing target. Also see responses under Tring Place Strategy.	
		Allow changes to the Green Belt boundary, if minor changes would create a more rational defensible boundary.		No change to policy. The Council acknowledges this may be possible through the Site Allocations DPD. The possibility of minor changes, in addition to local allocations, is referred to in paragraph 8.28.	
		Should criterion (c) refer to: - Use of land which meets local needs and is responsive to household growth: or - The choice of land enabling Green Belt to remain for future generations?	S	No change. Both factors are relevant in considering levels of development, choice of sites, use of land and permanence of the Green Belt. However the criterion itself needs no qualification.	
		Add criterion to encourage mixed use schemes.		No change. The policy covers the selection of development sites (whatever the use) and is appropriately worded.	
Policy CS3	14	Delete the policy or amend it to be more flexible and governed by housing market conditions. [Representations also relate to objections to the overall level of housing supply and any prospective deferral of delivery.]		No change. The approach helps to manage housing supply (in particular) over a long period. This is important in a borough constrained by Green Belt and Chilterns AONB, and avoids unnecessary release of Green Belt land and assists regeneration. There are a number of criteria which will help guide the release of the local allocations. Housing market conditions will be relevant because they will guide the type and rate of delivery, which will be monitored through policy CS17. It may be decided that there are circumstances warranting release of local allocations earlier than specified in the Site Allocations DPD.	
		Local allocations at Berkhamsted and Tring should come forward in the short term.		No change. The allocations are not needed in the short term to meet local housing objectives or the borough housing target. Also see above response.	
		More than one local allocation can be justified at Tring.		No change. Tring is a constrained location, for which the Council has carefully balanced considerations of housing need against various impacts. A second local allocation is not needed to meet the town's housing objective or borough housing target. Also see responses under Tring Place Strategy.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Site Allocations need to consider lead in times and give certainty.		No change to policy. The principle is however accepted.	
		Criterion (a): refer to existing or proposed infrastructure.		No change. The criterion appropriately addresses the issue of the availability of infrastructure when it is needed. It is consistent with Policy CS35. The additional words are unnecessary and potentially misleading.	
		Criterion (b): add reference to need being based on natural population growth.	S	No change. The criterion is appropriate. The need is not simply related to population growth. It could concern the accommodation of affordable housing, for example, and how that supply is coming forward across the borough. In the same context, it could also refer to other uses which are needed.	
		Criterion (c): refer to specific types of benefit (e.g. social infrastructure).		No change. The criterion is appropriate. The addition is unnecessary.	
		Insert criterion referring to the housing land supply.		No change. The criteria in the policy cover the relevant factors. Housing supply is a consideration lying behind the release date to be decided in the Site Allocations DPD. It is also relevant to criterion (b). Policy CS17 covers the management of the housing supply. If housing supply falls short, the Council will take remedial action. This could involve the early release of a local allocation, but not necessarily.	
Monitoring/Delivery	-				
Policy CS4	5	Should the policy refer to urban extensions at Hemel Hempstead and Berkhamsted or local allocations?		No. Policy CS4 is concerned with what happens within towns and large villages – land use and broad settlement character. Unlike Policies CS2 and 3 it is deliberately not concerned with urban extensions. When the local allocations are delineated in the Site Allocations and the Green Belt boundary is formally redrawn, local allocations will become part of the urban area. Each local allocation will be a specific proposal and completed. After the local allocations are completed, Policy CS4 will apply to any future planning applications, as it does to other land within towns and large villages.	
		The policy does not sufficiently accommodate natural population and household growth.		No change. See responses under Policy CS17.	
Monitoring/Delivery		Refer to the character of the residential area (to amplify reference to compatibility of non-residential development with its surroundings). Take a more positive stance to the accommodation of residential, retail and business uses in town centres, particularly at Hemel Hempstead.		No change. The policy is appropriately worded. Urban design and residential character are covered in Section 10. No change. Policy CS4 encourages a range and mix of uses. More detailed, subordinate policies will help ensure a variety is achieved. That will involve some control of uses: for example, to encourage ground floor shopping and commercial uses in a shopping area; to ensure there are opportunities for appropriate community uses; to ensure the retail shopping hierarchy is maintained.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
The Countryside: 8.21-26	8.23	2	Refer to the setting of Berkhamsted Castle.		No change to this paragraph, which appropriately refers to the main role of the Green Belt and countryside on the edge of towns and large villages. However further reference to the castle can be made under Berkhamsted Place Strategy.	
	8.24		Ensure there is a clear boundary between the town and the A41.		The principle of a green swathe between the town and the A41 is accepted. It is effectively proposed in the Core Strategy already. Amend text in Berkhamsted Place Strategy accordingly.	MC82
- Green Belt: 8.27-32	8.28	4	Do not amend the Green Belt boundary at Berkhamsted.		No change. The paragraph is appropriately worded. The housing target proposed requires some release of Green Belt land.	
	8.29		Amend the reference to inappropriate development, which should only be accepted under very special circumstances.		Amend sentence to explain that development in the Green Belt will only be permitted in limited circumstances.	MC10
	8.31		Should criterion (d) refer to community benefits as well?		Paragraphs 8.30-32 can be simplified. Social benefits may be a reason in support of redevelopment or infilling.	MC11 MC12 MC13
Table 2	l l	-				
[objections for Policy CS5 and Mo	onitoring/Delivery]	14	Release all local allocations now, amending the key diagram to illustrate the amended Green Belt boundaries.		No change. All local allocations will be released from the Green Belt and development permitted. Delineation of sites and detailed policy principles will follow through the Site Allocations DPD. The key diagram cannot delineate sites. Phasing of development in conjunction with infrastructure needs and maintenance of a sensible housing land supply is an important consideration. The housing land supply is varied: there is some greenfield land already identified, which can come forward now. The Council's approach on the release of Green Belt land is reasonable.	
			Should the policy refer to local allocations being released from the Green Belt?		No change. The policy appropriately does this.	
			Review the Green Belt boundary: a) generally to allow for more housing; or b) specifically to release additional sites for development: - at Lock Field, Northchurch - south of Berkhamsted - adjoining Longbridge Close, Tring (Waterside Way) - at East Hemel Hempstead. [At East Hemel Hempstead, the issue could be referred to the Area Action Plan.]		No change. There is no need for any further general review of the Green Belt boundary. Sufficient land is provided to meet appropriate development needs, with the local allocations indicated on the key diagram and in Table 9, Section 14. The Council has considered a number of alternatives, including other suggestions raised in objections to Table 9. The Council is satisfied that the level of housing and selection of local allocations proposed are reasonable. The plan period has 18 years to run and it is not necessary to release more land from the Green Belt than currently proposed. In the longer term, the first, logical option to meet development needs would be at Wood End Farm, East Hemel Hempstead – see also response at paragraph 20.17.	
			Should land release imply development now or safeguarding until some point in the future?		No change. There is no need for further review of the Green Belt and release of land beyond the local allocations. See response above also.	
			Allow for the infill development area at Kings Langley School to be		The school is acknowledged as a major developed site. The	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
		reviewed. Does Policy CS5 unnecessarily change national Green Belt policy or provide a justified local policy? Does reference to national policy create	S	infill boundary will be reviewed in the Site Allocations DPD. The Green Belt is a very important planning area first defined in the 1950s in Dacorum (and Hertfordshire). Local policy	MC14
		 inherent contradictions for local interpretation? Detailed points include: Under (a): are appropriate facilities for appropriate uses acceptable? Under (b): should replacement buildings be permitted? Can they be materially larger, rather than 'like for like'? Under (c): should reference be made to the original building and to proportionate extensions being acceptable? Under ii: what is the purpose of the phrase, 'maintenance of the wider countryside' and 'if relevant'? Final sentence: should previously developed sites (excluding temporary buildings) be referred to instead of major developed sites? 		has continued to amplify Government policy, and it is appropriate that this approach is continued. Draft CS5 proposed to continue Green Belt policy in the adopted Local Plan. To substantially change that will undermine the long term approach towards the planning and management of the Metropolitan Green Belt (and South Bedfordshire Green Belt) in Dacorum. The Council acknowledges that further harmonisation with the main principles of the National Planning Policy Framework would be appropriate: this is why a minor change is proposed to cover the main classes of development regarded as appropriate in any green belt. "Appropriate development" should rationally be subject to other criteria which are pertinent to the area, hence reference to the impact on the countryside. The point of accepting new development is that it should individually and collectively help towards the maintenance of communities, land and open uses in the countryside and the enjoyment of the countryside itself – what the Council terms as the maintenance of a living countryside. Further guidance is and will be added to Policy CS5, particularly on replacements, extensions, existing developed sites and changes of use. Saved Local Plan policy also applies. The NPPF defines 'original building'.	
		Should planning applications be determined on their own merits with regard to very special circumstances?		Planning applications should be determined in accordance with stated policy and other material considerations.	
		Should the uses in Policy CS7: Rural Area (e.g. farming, forestry, countryside recreation) be covered by Policy CS5?		No change. They are, as uses defined as appropriate in the Green Belt in national policy. Paragraph 8.22 covers the countryside in general, both the designated Green Belt and the Rural area beyond it.	
Monitoring/Delivery	*	Do not refer to the Countryside Management Service, if not funded by the Council.		The CMS is currently not core-funded by the Council. That may well change over the plan period. The efforts of the CMS can still help to deliver countryside initiatives and in principle this is supported. A very minor change is suggested.	MC15
- Selected small villages (GB):8.33-34	8.33 1	How would a facility identified in a village appraisal or neighbourhood plan be delivered? [Council land could be provided and market housing help fund a facility.]		No change. It depends on the facility and what is justified. The Infrastructure Delivery Plan will pick up key issues. The delivery of a new facility is possible through a variety of means, including local community fund raising and tapping in to grant aid.	
	8.34 1	Is the definition of where infilling can take place too restrictive? [Market housing can help to deliver affordable housing in new developments and through financial contributions to off-site development.]		No. The paragraph text provides appropriate advice as a guide to what infilling means in the context of a village constrained by Green Belt designation. The Countryside Place Strategy includes a local housing objective, to which a small amount of development at the Green Belt villages will	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Should the matter [definition of infilling] be left to individual planning applications?		contribute. Policy CS6, as a continuation of Local Plan policy, is intended to help support local needs. It is not intended to provide large amounts of development whether for affordable housing or not. The approach is to limit development in the Green Belt. The policy identifies locations where least harm will be done and most benefit can occur. The definition provided is considered necessary in the light of experience. The Council considers market housing normally to be inappropriate in the Green Belt. No change. To a degree this will always be the case. The paragraph text provides some guidance.	
Policy CS6	4	Should infilling be restricted to satisfying local needs (i.e. affordable housing for local people) or should it include market housing? (Item (b))		No change. Market housing is inappropriate development in the Green Belt. A general policy encouraging market housing will raise expectations of value: it will not necessarily bring forth any more affordable housing to address local needs and may actually inhibit it. The Council has the options of identifying specific schemes through the Site Allocations DPD or on an exceptions basis working with the local parish councils, where necessary.	
		Should a new item be added: - residential development for sale on the open market, where this will help to deliver affordable housing or other facilities for which there is a proven local need?	S	No. The Countryside Place Strategy includes a local housing objective, to which a small amount of development at the Green Belt villages will contribute. Policy CS6, as a continuation of Local Plan policy, is intended to help support local needs. It is not intended to provide large amounts of development whether for affordable housing or not. The approach is to limit development in the Green Belt. The policy identifies locations where least harm will be done and most benefit can occur. The definition provided is considered necessary in the light of experience. The Council considers market housing normally to be inappropriate in the Green Belt. Also see above response. Local facilities do not need to be provided through market housing in the way suggested.	
		If too many conversions of large dwelling houses into flats are carried out, there could be a strain on local infrastructure. (Item (c))		No change. This is highly unlikely. However monitoring will observe trends and liaison with infrastructure providers will be maintained. Policy will be kept under review through Annual Monitoring Reports.	
		Refer to the Chilterns AONB in criterion ii.		No change. This is not necessary. Policy CS24 will apply to the design of any development within the AONB. The presence of the AONB may be another reason for maintaining tight control of development. Paragraph 8.21 already refers to the AONB.	
Monitoring/Delivery	-				
- Rural Area:8.35-36	-				
Policy CS7	4	Is housing precluded from the Rural Area?		No, but it is directed towards selected villages. Reuse of buildings may involve residential use: saved Local Plan policy applies. No change.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			Allow limited market housing to help: - fund affordable housing or new community facilities; - bring forward a vacant site.	S	Housing should normally be directed to the selected villages, not the open countryside. There may be circumstances where housing is an appropriate use in conjunction with mixed use, reuse or appropriate redevelopment outside villages (as well as inside): these will be limited. Opportunities can be taken to support rural businesses.	MC16 MC27
			Should item (g) refer to all rural businesses?	S	No. The policy encourages businesses which help to support the countryside and its open, intrinsic character. However, the types of small scale development can more logically be similar to those in the Green Belt. Saved Local Plan policy supports rural businesses through the reuse of buildings. Like new housing, new businesses (employment development) are encouraged at the selected villages.	MC16
			Should the criteria (i and ii) in Policy CS5 also apply to development in the Rural Area? Should it also refer to village character?		The last paragraph of Policy CS1 applies. However it may also be helpful to relate the clauses in Policy CS5 which relate to the open countryside to Policy CS7 in addition. Development at the villages is adequately managed by Policy CS1.	MC16
			Cross refer to Policy CS24: The Chilterns Area of Outstanding Natural Beauty.		No change. This would be unnecessary. The Core Strategy should be read as a whole, and paragraph 8.21 already refers to the AONB.	
Monitoring/Delivery		-				
9. Enabling convenient access Text: 9.1-11 9.	9.3	1	Refer to the control of parking spaces in order to minimise problems of unregulated roadway parking and verge and pavement parking (including work vehicles).		No change. The policy approach is appropriately framed and need not refer to these particular problems. The Council and County Council do however recognise there are issues, the solution to which is difficult. It rests with influencing behaviour and journey mode, and the availability of space management and enforcement. The approach to car parking is and will be covered in much more depth through the local transport framework and other, planning policy advice.	
	9.11	1	Should more detail on local transport planning, in particular Berkhamsted Urban Transport Plan and the issues it should tackle, be provided?		No change. It is the function of the local transport framework to provide the detail on integrated transport strategy, works and investment. The local planning framework will be complementary	
Table 3	•	-				
Policy CS8		4	Commit to cheap, frequent, safe and secure bus services and the transfer of vehicles to cleaner fuels.		No change. In principle this is the position now. What can be achieved is constrained by resources and the amount of available subsidy.	
			Reduce parking at new development.	S	No change. Parking standards were based on survey work commissioned by the County Council and included in the Local Plan. They can be reviewed through the Development Management DPD. The broad approach is currently to accommodate car parking at residential developments (limited at the most accessible locations) and constrain car	

Qualify the last paragraph: - Contribute to the Local Transport Plan and Urban Transport Plan where possible; or - Demonstrate improvements to the local transport network. S No cl frame chan quality appropriate to the local transport network.	estricting off street residential parking tends to encourage in street parking. o change to Policy CS8. The local transport planning amework will be subject to consultation and evolve: a minor hange to paragraph 9.11 will clarify. However, the utilitications suggested unnecessarily weaken the policy oproach and are inappropriate. It is important that the anning and transport framework dovetail. The Council is uided by the local highway authority (and other frastructure providers) on infrastructure needs and rovision. The Council advises infrastructure providers on the level and location of development. The Infrastructure elivery Plan will take its lead from the local highway authority on most transport infrastructure matters. The	MC18
Qualify the last paragraph: - Contribute to the Local Transport Plan and Urban Transport Plan where possible; or - Demonstrate improvements to the local transport network. S No classical frame chan quality appropriate improvements to the local transport network.	o change to Policy CS8. The local transport planning amework will be subject to consultation and evolve: a minor hange to paragraph 9.11 will clarify. However, the ualifications suggested unnecessarily weaken the policy oproach and are inappropriate. It is important that the anning and transport framework dovetail. The Council is uided by the local highway authority (and other frastructure providers) on infrastructure needs and rovision. The Council advises infrastructure providers on the level and location of development. The Infrastructure elivery Plan will take its lead from the local highway authority on most transport infrastructure matters. The	MC18
Coming relati	ommunity infrastructure Levy will incorporate an element elating to transport. Development proposals will therefore partribute to the delivery of local transport plans.	
Policy CS9 2 What are small scale road improvements? This with the would plant A received in the policy of the policy CS9.	his phrasing is a continuation of Local Plan policy agreed ith the local highway authority. Small scale improvements ould normally be prioritised through the local transport anning process. Junction improvements would be typical. recent example, delivered through development, is a short local in central Apsley and closure of the Storey Street nction with London Road.	
highweight Hem include recer part of dever around the state of the sta	o change. This proposal has been agreed with the local ghway authority. It has been tested through the Hemel empstead Transportation Study and Plan (1990s) and cluded in the Local Plan. It has been considered by the ecent Hemel Hempstead traffic model and is expected as eart of the transport improvement to accommodate new evelopment at East Hemel Hempstead. The route runs round Maylands Business Park (not the town) and requires empletion.	
for ne of cri	o change. The policy is appropriately phrased. Alternatives or new development have been assessed against a variety criteria. The delivery of infrastructure could be a benefit if was needed in the first place. Invariably a new road would a condition of the development itself.	
Monitoring/Delivery -		
10. Securing quality design -		
Text: 10.1-5 10.4 1 Add the impact of light pollution on natural environments to the list of examples. No clopolicity policity the h	o change. The list covers sufficient examples. Saved policies cover the subject. A reference in Policy CS32 will be a hook for updating the saved policies through the evelopment Management DPD.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
Figures 11-13	-				
Quality of the built environment: 10.10-14	-				
Policy CS10	2	Refer to stepping stones and other ecological linkages ((criterion (g)).		No change. The criterion is appropriately phrased. Wildlife corridors are identified on the vision diagrams. More is said about biodiversity in Section 18. Changes there help to reinforce the importance of biodiversity and ecological links.	MC62 MC64
		Add criterion to protect the historic street pattern and legibility of the settlement.		No change. The policy is appropriately worded. All development should follow the three step approach to urban design. Understanding character and urban design are essential to Policies CS10-12 and CS13. Figure 11 includes street pattern as a consideration. The character identified and its significance are the basis for decisions. Historic street pattern is specifically protected where most important through Policy CS27.	
Policy CS11	2	Amend criterion (a): conform to the typical density and graining.		No change. The criterion is appropriately phrased. Density – i.e. the number of dwellings per hectare - is an imperfect measure, but is used as a guide. Spacing between buildings and general character (e.g. building scale and coverage) are more important and are also covered in the criterion.	
		Refer to Character Area Assessments in addition to the SPD on Urban Design.		No change. The Council intends that the (residential) Character Area Assessments prepared in the 1990s will be updated, as necessary, and absorbed into the Urban Design SPD. The settlement vision diagrams, which are derived from Urban Design Assessments, provide a basis for this.	
		Add criterion to make a positive contribution to the character of the historic environment.		No change. This is not a separate consideration, but integral to the understanding of urban design. Age and history are facets of character. Also see response to Policy CS10.	
Policy CS12	2	Include a criterion that relates to ecological issues		No change to Policy CS12. However a suitable criterion will be included in Policy CS29.	MC64
		Amend criterion (d) to refer to suitable numbers and locations and benefit to ecological connectivity.		No change. The level of detail suggested is unnecessary. Minor changes to Section 18 will cover the main concerns.	MC62 MC64
		Amend criterion (e) to refer to appropriate species and locations and		No change. The level of detail suggested is unnecessary.	MC62
		benefit to biodiversity and ecological connectivity. Alternatively, amend criterion (e) to assimilate development into its setting and improve appearance at the settlement edge.		Minor changes to Section 18 will cover the main concerns. Agree in part. Assimilating rather than screening development is more appropriate within settlements. The relationship of settlements with the countryside suggests there should be a soft edge, continuing current Local Pan policy.	MC64 MC19
Quality of the public realm: 10.15-20	-				
Policy CS13	3	Should criterion (f) be extended to refer to: - brown/green roofs: and/or - wildlife value and ecological connectivity?		No change. The level of detail suggested is unnecessary. Minor changes to Section 18 will cover the main concerns.	MC62 MC64

- Strengthening Economic Prosperity

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Strengthening Economic Prosperity		-				
Strategic Objectives		1	Strategic objectives should include encouraging tourism and employment generation through heritage initiatives and projects.		No change. The principles are covered in Objectives 9, 11 and 12.	
11. Creating jobs and full employmen	t	1	See under Monitoring/Delivery			
Text: 11.1-9		-				
Table 4		1	Refer to the role of sustainable tourism and heritage projects for Dacorum.		No change. Table 4 sets out the economic development strategy objectives contained in the published Economic Development Strategies for Hertfordshire and Dacorum.	
Low Carbon Economy: 11.10-13	11.11	1	Refer to the planning system giving preferential treatment to repair and servicing enterprises.		No change. The Use Classes Order does not allow the planning system to give preferential treatment to repair and servicing enterprises and there is no overriding economic reason to single out these particular uses.	
Maylands Business Park: 11.14		-				
Supporting tourism: 11.15-17		2	Refer to Hemel Hempstead's industrial paper making heritage and organisations such as the Paper Trail Trust.		No change to paragraph text. However, further reference to the paper making heritage is proposed in the Hemel Hempstead Place Strategy.	MC69
			Provide a creative vision for the role of tourism and/or coherent tourism policy.		No change. The level of existing coverage is considered accurate and appropriate for the Core Strategy. The Council will provide further detail in a tourism policy statement.	
	11.16	1	Give more weight to sustainable tourism, with good access by public transport and measures to reduce car traffic.		No change. Paragraph11.16 already deals adequately with this point.	
Policy CS14		4	Waste management facilities are appropriate in General Employment Areas with general industry and storage and distribution uses.		Agree. Amend text in Section 18 on waste management accordingly.	MC67
			Promote a sustainable economy that supports renewable technology and local production.		No change. The policy already supports the transition to a low carbon economy and more detailed guidance on sustainability is provided in Policies CS28-30. It is not possible to use planning policies to require local production, though the policies within the plan seeking to encourage a strong local economy enable this.	
			State that employment will be well paid, with full workers' rights and recognition of trade unions.		No change. The points raised are covered by national legislation and are not planning matters.	
			Give support for setting up co-operatives and a mixture of manufacturing, farming, allotments and services.		No change. The Core Strategy encourages a variety of businesses, not any one particular model. Rural enterprise is generally encouraged. However, setting up co-operatives is not a planning matter. Schemes involving a mixture of manufacturing, farming, allotments and services may require Green Belt sites: such schemes would need to comply with Green Belt policy.	
			State that a flexible approach to economic development will be taken where there is no demand for office floorspace.		No change. Technical evidence indicates that the demand for office space will increase during the plan period and provision has been made to accommodate this whilst also allowing flexibility to reflect changing market conditions. Detailed requirements regarding the types of employment uses permissible in different General Employment Areas will	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
				be determined through the Site Allocations DPD.	
		Is the target of 10,000 additional jobs between 2006 and 2031 realistic?	S	No change. The policy refers to approximately 10,000 jobs. Paragraph 11.2 explains that this figure was recommended by the Council's employment consultants, whilst paragraph 11.3 stresses that the forecast growth in jobs is an estimate, not a precise target. The Council will monitor take-up, market conditions and economic prospects and review the target in a few years time.	
		Refer to engagement with landowners and developers to ascertain what is possible.		No change. Partnership working with organisations that represent landowner and developer interests is already referred to.	
		Should working hours be reduced in order to achieve nil unemployment?		No change. This is a matter for employers. The points raised are not planning matters.	
Monitoring/Delivery *[the number of objections is covered under Policy CS14 and Section 11 heading]	*	Explain how the Council might use its own resources and other funds, including Section106 obligations and community infrastructure levy, to encourage new business initiatives and investment.		No change. The principle of partnership working is already covered. This can include access to funding. The approach to developer contributions is set out in Section 28. Further detail will follow in supplementary guidance including the CIL charging schedule.	
		Amend monitoring indicator 3, because B classes alone cannot provide all the economic development and jobs needed.		No change. Monitoring floorspace change in the B classes is essential. Paragraphs 12.5 and 12.13 already imply that well over half the 2006-2031 job growth is expected to be in non-B jobs. There are two other indicators, which refer to jobs and unemployment.	
12. Providing for offices, industry, etc	-				
Text: 12.1-4 12.1	1	Remove reference to the Hicks Road site in Markyate as a General Employment Area (GEA) and allow redevelopment of the site to be guided by the Hicks Road Masterplan and the site specific policy in Strategic Site Allocation SS2.	S	The reference to Hicks Road GEA is correct, and some employment land will remain. However, the principal GEAs are located in the three towns.	MC20
Offices: 12.5-10	-				
Industry, storage etc: 12.11-13	-				
[objections include Monitoring/Delivery]	4	Is there an over-supply of office accommodation in relation to demand?		No change. The response to issues at Policy CS14 above refers to the technical evidence that the demand for office space will increase. Paragraphs 12.3 and 12.4 give appropriate flexibility for non-B classes on GEAs where appropriate.	
		Acknowledge that the protection of B-class uses on GEAs may include waste management facilities: this would be compatible in areas with B2 and B8 (industry and storage) uses.		Amend text in Section 18 to state that waste management is appropriate in compatible GEAs.	MC67
		A more flexible approach is needed, so that employment sites no longer suitable for such use or not viable for B-class development can be developed for other uses.		No change. The response to issues regarding Policy CS14 refers to the technical evidence that the demand for office space will increase. Paragraphs 12.3 and 12.4 give appropriate flexibility for non-B classes in GEAs where appropriate.	
		Amend the policy to state that mixed uses will be encouraged in GEAs, especially where residential development could make a scheme viable and deliverable.		No change. Specific GEAs can be reviewed through the Site Allocations DPD. Mixed use (with residential) and redevelopment is appropriate in some circumstances (for	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			Amend final paragraph to state that: "New office uses and other	S	example in the Heart of Maylands, live work units). However, residential is not necessarily a suitable use in a GEA for reasons of amenity and traffic/parking generation. A blanket approach to encouraging residential use also runs the risk of undermining the supply of employment/commercial land in the short and long term. The Council's consultants, Roger Tym, have reviewed Local Plan allocations for employment use: their advice is that the amount of land and sites is needed. The Council will take a flexible approach to employment development depending on economic circumstances. This will involve the Council in monitoring take-up (of sites, premises and development opportunities), market conditions and economic prospects and potential review of floorspace targets in a few years time. No change. A high standard of design is expected in all	
			employment uses (where necessary) will be allowed in core office locations and Hemel Hempstead town centre subject to high standards of design."		locations. Town centres are locations where a broad range of uses is encouraged, including the prime retail/commercial function. Specific GEAs can be reviewed through the Site Allocations DPD. Directing new offices to particular locations does not rule out compatible uses, but it does help set the 'tone' for that area. The Council will take a flexible approach to employment development depending on economic circumstances.	
Monitoring/Delivery			Explain how the Council might use its own resources and other funds, including Section106 obligations and community infrastructure levy, to encourage new business initiatives and investment.		No change. The principle of partnership working is already covered. This can include access to funding. The approach to developer contributions is set out in Section 28. Further detail will follow in supplementary guidance including the CIL charging schedule.	
13. Supporting retailing and commerce		-				
Text: 13.1	_	-				
Retail hierarchy: 13.2-4	13.3	1	Emphasise the importance of local centres with a neighbourhood shopping function and stress the essential nature of the shops, services and facilities provided.		Add a sentence to underline the importance of accessible shops and services, stating that the Council will support their provision and retention where it can.	MC22
Table 5		2	Jarman Fields should be deleted from Table 6 and identified in Table 5 as a local centre with a district shopping function.		No change. Jarman Fields clearly functions as an out of centre retail and leisure location, rather than as a local centre with a neighbourhood shopping function.	
			Include South Berkhamsted as a "Local Centre with a neighbourhood shopping function."	S	No change. The Core Strategy proposes that the South Berkhamsted remains in the Green Belt, so there is no need for a new local centre.	
Shopping areas: 13.5-6	13.5	1	Add: "The Main Shopping Frontages of the town centre equate to the Primary Shopping Area as defined by PPS4."		No change. Main shopping frontages are the primary frontages referred to in current and previous Government policy and mixed frontages, the secondary frontages. The terms used by the Council are straightforward and maintain continuity of policy.	
Out of centre retail development: 13.7-12	13.7	2	Delete text stating that new retail development will not be allowed in out of centre locations. Instead, state that any proposals for new retail	S	No change. The paragraph does not rule out all out of centre retail development - it says that significant new retail	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			development must comply with the tests of PPS4		development will not be allowed. This wording, together with paragraph 3 in Policy CS16, is considered appropriate given paragraphs 23-27 in the National Planning Policy Framework (NPPF), which has replaced PPS4.	
	13.9		The sequential approach should require new retail development to be delivered to primary shopping areas within defined centres first. Therefore point 1 should refer to "Locations within the main shopping frontages of existing town centres and within the centre boundaries of the smaller district and local centres."		Amend the sequence to refer to shopping areas in (town and local) centres first, followed by other locations in centres and edge of centre locations.	MC23
Table 6		3	Jarman Fields should be deleted from Table 6 and identified in Table 5 as a local centre with a district shopping function.		No change. Jarman Fields clearly functions as an out of centre retail and leisure location, rather than as a local centre with a neighbourhood shopping function.	
			Consider the provision of sustainable out of centre retail and leisure locations outside Hemel Hempstead.	S	No change. It is considered that future significant retail and leisure developments should be sited in sustainable locations in existing centres.	
Policy CS16		4	Identify the PPS4 thresholds for new retail developments being considered against the sequential approach and impact assessments (2,500 sq metres and above).	S	No change. The Council will consider location, scale and impact for all retail development. No size threshold has been set for requiring a retail impact assessment. The Council will consider this matter further in the context of adding detail to its Core Strategy policies.	
			State that the floorspace figures quoted are neither absolute nor maximum figures. [Proposals above these figures could be accepted where compatible with tests in PPS4 and Government policy.]		No change. The policy provides a broad indication of potential future demand. The figures will be used to guide the scale of land allocations for retail development in the Site Allocations DPD.	
			Delete sentence 1 in paragraph 1 and all of paragraph 3. Replace by "New retail development will be assessed in accordance with national policy, as set out in PPS4. It will be required to satisfy the key policy tests of the sequential approach and impact, where necessary."	S	No change. The existing wording is considered appropriate in the context of paragraphs 23-27 in the National Planning Policy Framework, which has replaced PPS4.	
			Meeting growth projections between 2009 and 2021 is the priority: long term projections to 2031 should be treated with caution and should be subject to monitoring and review.		Amend paragraph 13.2 to state that the level of new development may reach the demand forecasts in Policy CS16 and that these forecasts will be more reliable for the shorter term (i.e. to 2021).	MC21
Monitoring/Delivery		-				

- Providing Homes and Community Services

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Providing Homes and Commu	ınity Services	-				
Strategic Objectives		1	Refer to priority being given to previously developed sites for housing.		No change. The Core Strategy needs to be read as a whole. It gives priority to previously developed land under the Strategic Objectives (Section 6) and Sustainable Development Strategy (Section 8 and Policy CS2).	
14. Providing homes		1	Refer to the flexible use of s106 contributions to take account of scheme viability and delivery.		No change. The Core Strategy acknowledges the issue, for example under Policy CS19 and Section 28 (paragraphs 28.9 - 28.11). The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The CIL charging schedule will be subject to specific Examination (like the Core Strategy). The Council will approach the issue of charging on a reasonable basis and avoid setting charges at a rate which hinders or prevents development. Charging will be related to needs.	
Text: 14.1-8	14.7	1	Housing need and demand are overestimated.		No change. The Core Strategy has taken a balanced view of a range of factors in setting the housing target, and not just the extent of unmet housing need. Unmet need is significant. The Council is reviewing the housing register and undertaking a local housing needs and market demand survey (effectively updating the Strategic Housing Market Assessment).	
Housing supply: 14.9-23	14.9	1	Reduce the housing target to 9,835 new homes and delete the local allocations in Table 9.		No change. See responses under Policy CS17 and Table 9 below.	
	14.16	2	Housing need and demand are overestimated.		No change. See response under paragraph 14.7.	
			The increase in home extensions (which reduces garden space) justifies a reduction in the allocation of new greenfield sites.		No change. Home extensions meet the needs of existing households. They do not meet the needs of new household. Forecasts take account of the rate of household formation.	
			Preserve the existing Green Belt boundaries.		No change. While the Council is concerned to maintain the character of the Green Belt that is retained, it cannot meet the housing target without some release of land from the currently defined Green Belt.	
	14.17	1	Refer to the Development Management DPD when determining major new proposals which are not in the Core Strategy.		No change. Any new proposal will be judged against all the relevant policies set out in the Local Planning Framework, including the Development Management DPD.	
	14.19	3	Using greenfield land in urban areas will undermine biodiversity and local character.		No change. The paragraph refers to sites that are already planned for within the housing supply e.g. local allocations, sites with planning permissions, existing local plan housing proposals etc. If new sites were to come forward then they would rightly need to be assessed against their contribution to local biodiversity and character.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Building in the Green Belt decreases biodiversity.		No change. The Core Strategy has taken into account a range of factors in judging the suitability of land to be released from the Green Belt, including biodiversity (in particular the Assessment of Local Allocations and Strategic Sites (May 2011) and Sustainability Assessments). Not all land in the Green Belt is necessarily of high biodiversity value.	
		Amend paragraph: local allocations <i>may</i> (not will) require small-scale Green Belt boundary changes.	S	No change. The text is accurate. The Green Belt boundary will be changed through the Site allocations DPD. The timing of development is covered by Policy CS3.	
		The proposed growth in housing, including windfalls, will place unacceptable pressure on existing infrastructure and risks changing the character of towns such as Berkhamsted and Tring.		No change. No absolute infrastructure constraints have been identified (in respect of the development proposed in the Core Strategy). Nevertheless, new development will address its impact on infrastructure and will invariably be required to provide physical or financial contributions (Policies CS23 and CS35). The scale of housing has been considered carefully and should not present undue impacts.	
		Do not include housing in the Green Belt land in the housing objective/projections for Berkhamsted.		No change. The housing supply involves a significant contribution from within its settlement boundaries including some greenfield land. In order to ensure a longer term supply, the Council considers a small release of Green Belt land is justified (Proposal LA4).	
		The housing projections for Berkhamsted have resulted in too high a density for Strategic Site SS1.		No change. The Council is concerned that land is effectively used and has weighed up relevant issues. See responses under Berkhamsted Place Strategy SS1.	
	4.20 2	The allocation for Berkhamsted is not sufficient to meet local needs and should be increased.		No change. The allocation of housing to Berkhamsted reflects a balanced view of a number of factors, including its size, its role in the settlement hierarchy relative to other places, its character, local housing need, availability of sites, and previous completion rates in the town. The figure proposed in the Core Strategy is considered reasonable.	
Table 7 Table 8	10	Should the total requirement or target be reduced to 9,835 dwellings, removing the need for local allocations?		No change. The overall target is sufficient to meet need and demand in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example). Simply relying on an urban capacity approach would significantly fall short of the level of growth signalled by population and household projections. Judicious use of local allocations will help to provide a steady and sufficient supply of housing over the plan period and to address housing needs. It is acknowledged that there are environmental consequences and infrastructure threshold issues within individual settlements. Local allocations do therefore need to be restricted. See also responses to Policy CS17.	
		Alternatively, should the total requirement be increased to 13,500 or 14,000 dwellings to accord with household projections?		No change. See above response and responses to Policy CS17.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		Increase the number of dwellings distributed to Hemel Hempstead to 11,070, identifying a new local allocation at Shendish.		No change. The overall housing target and share to Hemel Hempstead do not need to be increased. The overall target is sufficient to meet need and demand in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example). The focus on Hemel Hempstead is appropriate: it includes a significant level of local allocations (Table 9). Land at Shendish is neither needed nor considered a good choice for a local allocation.	
		Should Hemel Hempstead's share of the housing requirement increase in the light of the concentration of houses and jobs there?		No change. The overall housing target and share to Hemel Hempstead do not need to be increased. The overall target is sufficient to meet demand and local need in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example). The focus on Hemel Hempstead is appropriate: it includes a significant level of local allocations (Table 9).	
		The number of houses allocated to Berkhamsted should be reduced to 750 in order to ensure population stability and locally generated needs.		No change. The distribution of housing is indicative and reflects a balanced view on a number of factors, including Berkhamsted's size, its role in the settlement hierarchy, the role and character of Berkhamsted and other places, infrastructure capacity, housing need, availability of sites and previous completion rates - not just household growth. Also see response below.	
		Alternatively, the level of housing for Berkhamsted should be 1,990, with an additional 881 being accommodated at Hemel Hempstead. [Table 8 (giving a prospective distribution of housing) is opposed along with Table 9 and Policy CS17. Reasons and linked concerns are set out more fully under a similar representation to Policy CS17.]		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. The impact on the Green Belt and green swathe between the town and the A41from proposals within the Core Strategy would be relatively modest: the impact of a new neighbourhood would be substantial. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected happens to approximate to past average delivery rates and is considered reasonable. Also see above response.	
		 Increase the number of dwellings distributed to Tring to: at least 630 by increasing the capacity of local allocation LA5; a minimum of 939 dwellings by identifying additional sites (including land at Waterside Way, Tring); and/or enable housing needs being met. 		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Tring. It has considered alternative levels against housing forecasts and the role of Tring in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of the town, its infrastructure and its surroundings. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				maintaining the population level and is considered reasonable. Alternative sites have been assessed. On balance the Council prefers LA5, and concludes it is sufficient. Also see responses relating to the growth of the town under Tring Place Strategy and LA5.	
14.2		Increase the number of dwellings to be delivered in Berkhamsted through site allocations, including land at Lock Field, New Road.		No change. The indicative level of growth (Table 8) is reasonable to meet the objectives of the town given a number of factors including the character of Berkhamsted, the availability of housing sites, and pressure on school places. Alternative sites have been assessed and on balance LA4 is preferred. Additional sites are not needed. See detailed responses raised to growth of the town and the need for an additional housing allocation (including that at Lock Fields, New Road) in the Berkhamsted Place Strategy.	
14.2	2 1	New development can <i>help</i> address shortfall rather than finance existing infrastructure deficits.		No change. The paragraph is appropriately worded.	
Table 9	23	Delete all local allocations (and set the housing target at 9,835 dwellings).		No change. Judicious use of local allocations will help to provide a steady and sufficient supply of housing over the plan period and to address housing needs. See related response under Policy CS17.	
		The local allocations raise potential technical concerns over access.		No change. Selection of local allocations has considered this issue. Joint discussion with the local highways authority will resolve any detailed matters, particularly through a master planning process.	
		Identify more local allocations at Hemel Hempstead.		No change. The overall housing target and share to Hemel Hempstead do not need to be increased. The overall target is sufficient to meet need and demand in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for example). The focus on Hemel Hempstead is appropriate: it includes a significant level of local allocations (in Table 9).	
		Identify a new local allocation on land at Shendish (for 900 units): • there are insufficient allocations to accommodate the housing requirement; and • local allocation LA3 is unsuitable.		No change. The housing target is sufficient to meet need and demand across the borough and in Hemel Hempstead taking a balanced view of relevant factors and local strategic objectives (Hemel Hempstead Place Strategy). The focus on Hemel Hempstead is appropriate as is. Land at West Hemel Hempstead is a logical development, can be delivered, and has active landowner interest behind it. Alternative housing sites have been assessed and on balance the Council prefers LA3 (together with LA1 and LA2). The Council considers the impacts of developing a new neighbourhood here to be unnecessarily damaging on the Green Belt and Apsley.	
		Designate a new local allocation at Lower Road, Nash Mills to provide additional dwellings and deliver more affordable housing.		No change. See above two responses. The Council considers the impacts of developing here to be unnecessarily damaging, particularly on the role of the Green Belt and functioning of the town.	

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		Identify land at the Paper Trail, London Road, Apsley as a local allocation for housing.		No change. Local allocations are by their nature sensitive Green Belt sites. The suitability of this urban land for housing is more appropriately dealt with through the Site Allocations DPD. It is not needed to meet the housing target, but if considered appropriate it could contribute.	
		The description of local allocation LA3 should allow for a greater number of units, by deleting <i>up to</i> (900).		No change. The impact of the proposed development needs to be controlled. Also see response to LA3 in the Hemel Hempstead Place Strategy.	
		Delete local allocation LA4 and reduce the capacity of strategic site SS1. [The housing figure for Berkhamsted is excessive to maintain population stability.]		No change. The local allocation is required to meet the local housing objective and help continue supply in the longer term. SS1 is excluded from the Green Belt, should be effectively used and is also needed to meet the local housing objective. Also see fuller responses under LA4 and SS1 in the Berkhamsted Place Strategy.	
		Designate a new local allocation on land south of Berkhamsted (for 800 dwellings). [Table 9 (listing strategic sites and local allocations) is opposed along with Table 8 and Policy CS17. Reasons and linked concerns are set out under a similar representation to Policy CS17.]		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. The impact on the Green Belt and green swathe between the town and the A41from proposals within the Core Strategy would be relatively modest: the impact of a new neighbourhood at south Berkhamsted would be substantial. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. This particular development suggestion is not needed; it would approximately double the level of development to come (to 2031). The pace of change would be damaging to the town's character – its traffic movement and central area, its green hinterland, its form and even options for growth beyond the plan period.	
		Designate land at Home Farm, Pea Lane, Berkhamsted as a local allocation.	S	No change. See above responses for a general commentary on the level of housing at Berkhamsted. This particular site is unsuitable for housing given its setting within the Chilterns Area of Outstanding Natural Beauty.	
		Local infrastructure is insufficient to support Strategic Allocation SS1.		No change. The infrastructure providers advise there are no absolute constraints to the delivery of proposed development. There are issues of course to address, and the Council continues to work closely with infrastructure providers. See detailed responses in the Berkhamsted Place Strategy and to SS1.	
		Include The Old Orchard in the site description of LA4 and increase the capacity to 65-75.		No change. The dwellings capacity is approximate and can be more precisely defined in the light of further assessment and master planning connected with the Site Allocations DPD.	

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		Designate land at Station Road as an additional local allocation(s). [Note that representations on the Core Strategy have been made to land both south and north of Station Road. The housing supply in Tring is too reliant on local allocation LA5 and windfall sites.]	S	No change. The Council acknowledges that levels of completions in the town are likely to vary over the lifetime of the Plan. However, the housing supply in Tring is robust and not overly reliant on windfalls (some contribution is reasonable). LA5 can be readily delivered and has active landowner interest behind it. The character of Tring and its surroundings and the capacity of local infrastructure are sensitive to the level of development. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to maintaining the population level and is considered reasonable. Various sites have been assessed. On balance the Council prefers LA5, and concludes it is sufficient. Using this particular location would extend the town significantly eastwards. Also see responses relating to the growth of the town under Tring Place Strategy and LA5.	
		Designate land at Land at Dunsley Farm, Tring as a local allocation instead of or in addition to local allocation LA5.		No change. See above response. This location and its farming activity is considered very important to the character of the town. Identifying future Green Belt boundaries and the logical extent of development would be problematic.	
		Designate land at Waterside Way Land at Waterside Way, Tring (300 dwellings) as an additional local allocation.		No change. See above two responses. This particular location would breach a very significant Green Belt boundary. Identifying the future boundary and logical extent of development would be problematic	
		Increase the capacity of local allocation LA5 at Tring to make better use of potential land available and better meet housing needs.		No change. The ultimate capacity of the potential built area may be greater than 150 new homes <i>plus</i> employment land, cemetery extension, play space and other facilities. It is also accepted that an effective use of land should be achieved. This will entail further consideration of height of buildings and density together with sensitive landscape design and assimilation into the landscape. Timing of development will be particularly important in terms of school infrastructure capacity. The dwellings capacity of LA5 is set at what is reasonable for the plan period. The Council wants to collaborate on more detailed investigations with the landowners: this may affect current conclusions.	
		Designate land at Bovingdon Airfield as a local allocation.	S	No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Bovingdon. It has considered alternative levels against housing forecasts and the role of Bovingdon and other places in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of the village, its constrained infrastructure and its surroundings. The overall target is sufficient to meet need and demand in the Borough taking a balanced view of relevant factors (summarised in paragraph 14.16 for	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				example) and local objectives (Bovingdon Place Strategy). The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Alternatives have been assessed and on balance LA6 is preferred: the impact on the Green Belt would be relatively modest. The new suggestion would be larger in scale, further from village services (than LA6) and have a more significant impact on the Green Belt	
[objections include Monitoring/Delivery]	28	Should the housing target be: a) reduced to 9,835 dwellings: or b) increased to between 12,084 and 15,750 dwellings (at a rate of 500-630 dwellings per annum? Reasons given for reducing the target: • give priority to empty properties; • give priority to previously developed land/brownfield sites; • prevent housing being built in the Green Belt. Reasons given for increasing the target: • to enable Dacorum to fulfil a sub-regional role, meet projected levels of need and to deliver the economic aspirations of the plan and a larger workforce; • to support jobs growth, given an ageing population and reducing household size; • to meet projected requirements, in-migration and to take account of sites not coming forward; • to properly reflect the evidence base (e.g. the SHMA); • to overcome deficiencies in the evidence base and properly relate decisions on sites against PPG3 [PPS3] • to meet housing need, provide new infrastructure, and to provide greater flexibility in supply; • to ensure the aims and objectives of the Core Strategy are achieved; • to exclude an allowance for windfalls contrary to PPS3 • to justify increased capacity within individual settlements / identified sites or to justify new allocations; • to accompany a local review of the Green Belt.	S	No change. Housing growth should not be met at any cost. The housing target has been set to ensure objectively assessed demand and local need are met as fully as is possible taking a balanced view of competing factors, including household growth and supporting new jobs. Higher levels of growth are more difficult to accommodate satisfactorily and have implications, particularly environmental impacts and growing pressure on infrastructure (e.g. school places). The housing target meets an appropriate level of demand, and can help deliver reasonable levels of new infrastructure and assist with regeneration. The Employment Land Update (July 2011) demonstrates that there is a good balance between jobs and the level of new homes, also bearing in mind the subregional role of the Maylands Business Park. The methodology behind the jobs growth figure is provided in the Employment Land Update (July 2011). The Council accepts that the current recession will tend to dampen jobs growth in the short term, irrespective of the level of housing set. The Council accepts that there could be an element of net outward migration of households, but this would be justified given Green Belt and other environmental constraints. The housing supply is robust and sites have been tested through the SHLAA process, against developer interest and in a number of cases with landowners. It is regularly updated through the Annual Monitoring Report process, but inevitably there will be fluctuations in housing supply over time. The Council can take action to ensure supply is maintained (see response below to delivery mechanism). It is appropriate to take account of long term windfalls given past rates of contributions. If full account is taken of windfalls they can increase the overall level of supply (Table 8). Some Green Belt release is necessary. Local allocations will help ensure a steady and sufficient supply of housing over the plan period and to address local housing needs within individual settlements. This has involved significant small-scale	

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				from further housing development (Policy CS5). A major review of the Green Belt is not justified. The level of vacant homes is very low in the borough (particularly within Council housing stock). They would contribute little to the overall housing supply nor dramatically offset the need for local allocations. The existing mix of urban capacity sites, strategic sites, and local allocation is sufficient to enable reasonable opportunities to deliver a mix of housing. Detailed arguments as to how the target was selected will be set out in a Housing Background Paper (May 2012). Also see separate comments for responses to housing at individual settlements, allocations and suggested new sites.	
		Identify additional housing locations: a) at Station Road, Tring; b) at Shendish, Hemel Hempstead; c) at Grange Farm, Bovingdon.	S	No change. For locations a) and b) see responses under Table 9 above. For location c) at Grange Farm, Bovingdon, see response under Bovingdon Airfield in Table 9. In all cases local allocations help to meet the housing target and local housing objectives. The selected local allocations have all been assessed against alternatives and are preferred. Grange Farm is an open greenfield site and a future defensible green Belt boundary would be difficult to define	
		Identify the strategic sites in the policy.		No change. Identifying such sites in the policy is not needed to ensure their support or delivery. Policy CS17 seeks only to provide an overview of housing land supply and not to detail individual allocations. Strategic sites are already identified within the relevant Place Strategy.	
		Refer to the release of local allocations and/or the identification of additional sites over and above those already included in the Core Strategy to ensure housing delivery across the plan period is maintained.	S	No change. The Core Strategy supports the release of identified local allocations subject to definition in the Site Allocations DPD and timing. Although the Council does not expect to release any additional local allocations, monitoring could theoretically identify a need. In those unlikely circumstances, the Council would then use Policies CS2, CS3 and CS17 to allow appropriate sites to come forward in order to maintain delivery.	
		Refer to opportunities to exceed the housing target over the lifetime of the plan.		No change. If the full supply of housing is taken into account, there is leeway to exceed the target (see paragraph 14.12 and Table 8). However, the target is not open ended and that supply and should be managed effectively, taking account of environmental and infrastructure constraints.	
		Should the review mechanism be: a) amended to: - provide sufficient clarity as to the mechanism and manner of the "action" to be taken; - refer to ensuring a five year supply of housing land; - clarify that there is still an obligation to ensure a five year housing supply; and - provide greater flexibility; or b) deleted because it operates against the effective and early	S	No change to the policy. The policy is appropriately framed. It sets a clear threshold as to when the Council should intervene in the housing programme and underlines the importance of maintaining a five year housing land supply. The Council is committed to maintaining a rolling supply of housing land (see paragraph 14.14 of the Core Strategy) and this will be regularly monitored through the Annual Monitoring Reports. The Council is committed to bringing housing sites forward at the appropriate time and in taking	

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		delivery of housing supply?		positive steps to support housing delivery. There may be much the Council can do to stimulate the local housing market in terms of its own landownership, working closely with developers, landowners and other partners, to be more flexible in relation to viability / contributions, and to help overcome blockages. Releasing local allocations is another option, not necessarily the first choice.	
		Should the policy be reworded to give greater clarity to Policy CS3 and the specific actions will be taken to increase housing supply?		No change to the policy - see above response. However some further clarification in the paragraph text to explain possible actions and the reasons for managing and phasing land supply would be helpful.	MC24 MC25 MC26
		How limited are the Council's powers to influence the delivery of housing?		No change. The Council recognises its influence will vary across individual sites. However, it does have planning, estates and housing powers it can use in appropriate circumstances to influence delivery.	
		Some scenario testing is essential to ensure the Council has explored "worst case" scenarios for housing supply and has a delivery mechanism in place to respond.		No change. The Council has adequately tested a number of scenarios in setting its housing target (see housing background paper (May 2012)). It is satisfied it has a robust delivery mechanism in place to respond to changes. Also see responses above.	
		There is no evidence that adjoining authorities, including Dacorum and Aylesbury Vale, have liaised with each other, as required under the duty to cooperate.		No change. The Localism Act places a new "Duty to Cooperate" and requires a statement setting out how the Council has worked with adjoining authorities. The statement will be provided as part of the Submission documents. It will explain cross-boundary working, collaboration with a variety of partners and areas of continuing discussion.	
		Greater clarity is required between the policy and the Housing Land Availability Paper (July 2011).		No change. The Housing Land Availability Paper (July 2011) seeks only to explain the housing land supply position in relation to meeting a variety of housing scenarios. It does not aim to set the details of the policy.	
		All new housing should have renewable technology and be energy efficient.	S	No change. The principle is broadly accepted, although there are issues about the timing of change in respect of Government policy, development costs and viability to consider. Policies CS28 and 29 address the issue	
Monitoring/Delivery		Refer to implementation through a Development Management DPD.		No change. All proposals will be judged against all the relevant policies set out in the Local Planning Framework, including the Development Management DPD.	
Housing mix: 14.24-30	-			·	
Policy CS18	4	The mix of housing on a site should also be guided by its viability.		No change. Agree. The policy needs to be read in conjunction with Policy CS19. This specifically refers to viability as an important factor in considering the level and mix of affordable housing.	
		The release of more land from the Green Belt will help deliver a more varied mix of housing types and tenures than previously developed land.		No change. The housing programme identifies a contribution from a range of sizes of sites from both greenfield and previously developed land. This includes a proportion of proposed Green Belt releases (i.e. local allocations). The	

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					diversity of sites provides adequate opportunity to support a mix of housing types over the plan period without additional Green Belt releases.	
Monitoring/Delivery		-				
Affordable housing: 14.31-38	14.32	2	The section would benefit from additional information on past rates of affordable housing delivery.		No change. The section is chiefly concerned with future requirements rather than previous delivery rates. This information is already reported on an annual basis through the Council's Annual Monitoring Report.	
			The policy is an aspiration built on very weak foundations.		No change. The policy is realistic and robust and reflects a balanced approach to delivering affordable housing taking into account the Core Strategy evidence base.	
			The proposed 35% target on qualifying sites is insufficient to meet a reasonable level of need.		No change. The target is reasonable given evidence in the Affordable Housing and Section 106 Viability Study (November 2009), balanced against the need to deliver on housing over the plan period.	
Policy CS19 *[objections include Monitoring/Delivery	below CS20]	10*	Setting a lower housing target would remove the need for development in the Green Belt, including affordable housing.		No change. This would not sufficiently address the need for affordable homes. Also see response under Policy CS17 to the size of the housing target.	
			Alternatively, increasing the area of land released from the Green Belt, particularly around Hemel Hempstead, would better meet the affordable housing requirement.		No change. The housing programme already identifies a contribution from a range of sizes of sites on both greenfield and previously developed land. The former also includes a proportion of proposed Green Belt releases (i.e. local allocations). This diversity of sites provides adequate opportunities to support sufficient levels of affordable housing over the plan period without additional Green Belt releases.	
			The 35% contribution to affordable housing should be an aspiration rather than mandatory.		No change. The policy sets out the Council's general expectation. However, the policy makes clear that there is flexibility in its application as the level of contribution will be judged against a range of criteria.	
			No thresholds are needed. Only a formal viability assessment is required to determine appropriate levels of affordable housing/contributions.		No change. It is important that the Core Strategy provides developers with clarity as to how the policy will be applied and what the general expectation will be. Levels of on-site or off-site affordable housing will be subject to viability in all cases.	
			A financial contribution toward social housing and infrastructure is not justified or effective for urban schemes of less than 10 dwellings or less than 3 dwellings in rural areas. The policy threshold should only apply to sites of 0.3ha or 10 dwellings or	S	No change. This is an appropriate approach given the scale of unmet need and the cumulative impact of small schemes on infrastructure. The threshold on balance is generous. It is reasonable for smaller development to contribute proportionately and the Affordable Housing and Section 106 Viability Study (November 2009) points to smaller schemes being generally viable. The Council is intending to operate a sliding discount for affordable housing contributions on smaller sites which will lessen the impact on viability. The methodology will be detailed in the Affordable Housing SPD. No change. See above response.	

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		more: a financial contribution should be sought on sites below these thresholds.			
		Social housing projects of 10 dwellings or more containing shared ownership housing should contribute pro rata to local and strategic infrastructure.		No change. Social housing schemes will need to contribute to infrastructure in accordance with Government policy.	
		Include a 35% mix of market housing in larger social housing schemes.	S	No change. It is important that opportunities for affordable housing are maximised where they arise, given previous undersupply and recognised scale of need. Market housing schemes will still continue to make a significant contribution to overall supply. The majority of housing schemes will directly or indirectly provide a mix of tenure and opportunity.	
		The minimum 75% affordable rent requirement should be reworded so that this is a target and not an absolute.		The policy sets out the Council's general expectation. However, the policy makes clear that there is flexibility in its application as mix will be judged against a range of criteria. A minor change will clarify that the criteria relate to tenure.	MC27
		The policy must be underpinned by investment in additional infrastructure/ public realm improvements from smaller housing schemes.		No change. The Core Strategy (e.g. Policies CS23 and CS35) seeks to ensure that all development, including affordable housing schemes, proportionately meets its demands either directly or financially towards infra in accordance with Government policy.	
		Remove reference to higher levels of affordable housing being sought on sites which are specified in a development plan document.		It is important that opportunities for affordable housing are maximised when they arise, given past undersupply and the recognised scale of need. There are circumstances where higher levels are justified in viability and planning terms, particularly through the release of a large greenfield site. The Council intends that in this circumstance, it will be specified in the development plan. Not all large sites however will suit a level of affordable housing in excess of 35%. A minor change will help clarify the Council's intentions.	MC27
		Include details of how levels of contributions will be calculated.		No change. Core Strategy policies should be kept concise. This level of detail will be dealt with in a supporting planning document –i.e. through the Affordable Housing SPD.	
		The requirement that on rural sites the development should be 100% affordable is unnecessarily restrictive, particularly in that it would encourage more greenfield development.		The policy reflects the Core Strategy's normal expectation as to the type of development encouraged and fits with Policies CS5-7 (relating to Green Belt and the Rural Area). It would not preclude a minor element of market housing if circumstances justified it – but this is not the norm. A minor qualification is considered reasonable, allowing particular sites to be identified in the Site Allocations DPD if appropriate. The policy would not necessarily exclude opportunities on previously developed land, but it is recognised that opportunities in rural areas are more likely to	MC27
		Refer to neighbourhood plans and other delivery mechanisms to reflect the requirements of the Localism Act.		stem from edge of settlement greenfield sites. No change. Neighbourhood plans are covered in Sections 2 and 19.	
		The policy should be redrafted to reflect an up to date viability		No change. Viability work is ongoing and takes account of	

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		assessment for different parts of the borough and different types of sites.		matters other than affordable housing – for example potential charges from the community infrastructure levy. Within the policy, there is sufficient flexibility to respond to current economic circumstances and the potential difficulties of delivering previously developed sites. The policy allows for judgements to be made taking into account the specific circumstances of a site. The thresholds are more generous than those recommended in the Affordable Housing and S106 Viability Study (AHSVS) and do broadly reflect opportunities across the borough. The AHSVS reflects the longer term upward trend in house prices and not simply the impacts of the credit crunch (para. 6.30-6.33). The Affordable Housing SPD will also be able to reflect current land values in relation to viability testing/commuted sums for different types of sites, and aims to introduce a sliding scale of contributions. These factors should ensure delivery on smaller and previously developed sites is not stifled.	
Policy CS20 Monitoring/Delivery	-	Refer to the flexible and pro-active use of s106 contributions to reflect viability of schemes and to ensure delivery is achieved.		No change. Policy 19 and Section 28 in particular acknowledges the issue of viability. All charges will be set in subordinate documents. The community infrastructure levy charging schedule will be subject to specific Examination (like the Core Strategy). The Council will approach the issue of charging on a reasonable basis and avoid setting charges at a rate which hinders or prevents development. Charging will be related to needs.	
Travelling communities: 14.39-46	_			will be related to fleeds.	
Table 10	_				
Policy CS21	_				
Policy CS22	2	The policy should contain the number of plots/pitches to be delivered and over what time scale.		The Council's approach to provision for Gypsies and travellers has been carefully developed in the light of assessments and consultation with the local Gypsy community, local residents, key stakeholders and other parties. The policy has been the subject of targeted consultation with the local Gypsy community. The paragraph text and monitoring section clearly indicate targets, although it is acknowledged they could vary in the light of any new assessment. The targets are to be delivered within the plan period, just as other targets are. New pitches are expected to be provided alongside large-scale planned developments, such as the local allocations. The timing and identification of sites will be progressed as part of the Site Allocations DPD process. This will not preclude other sites being identified in the Site Allocations DPD and/or coming	

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		How will working arrangements across Hertfordshire deliver transit pitches and accommodation for travelling showpeople?		forward through the development management process. No change. This is not simply a matter for the Core Strategy. Policy CS22 includes criteria to assess a potential transit site or pitches. It is more generally an issue to be discussed with other Hertfordshire authorities. There is no identified demand either in the Borough for travelling showpeople or in south and west Hertfordshire, hence the absence of specific details on delivering new accommodation for this group.	
		Delete criterion (a).	S	No change. This sets out the Council's general expectation for accommodating new sites and will help integration. It is important that sites are dispersed to ensure need is met across the borough and to avoid placing undue pressure on individual settlements and their infrastructure. Consultation with the travelling community has also identified that they favour some form of dispersal of new sites, as does the settled community. The policy does not preclude an exception being made in the case of smaller sites if circumstances justified.	
		Amend criterion (b) to refer to sites being reasonably accessible to facilities.		No change. The existing wording is a reasonable interpretation of guidance provided in Planning Policy for Traveller Sites (March 2012), paragraph 54 of Circular 01/06 and paragraph 3.2 of the Designing Gypsy and Traveller Sites Good Practice Guide.	
		Delete criterion (d).	S	No change. The policy seeks to ensure that when sites come forward that their full potential is realised and properly planned for over time. This is logical and reasonable given the difficulties of securing new sites. It would allow sites to grow, for example, to accommodate the future needs of families and residents.	
		Amend criterion (e) because it is too prescriptive.		No change. The wording is a reasonable interpretation of guidance set out in the Planning Policy for Traveller Sites (March 2012) and the Designing Gypsy and Traveller Sites Good Practice Guide. It is reasonable for a new site to be designed to a high standard, sensitively delivered and fit in with its surroundings, particularly if located as part of a larger residential development	
		New sites should not be provided in the Green Belt. Proposals should be judged on a similar basis to mainstream housing		No change. No realistic brownfield opportunities for new sites have been identified: hence the focus is on greenfield sites on the edge of settlements. Evidence is provided in the Stage Two South West Hertfordshire Identification of potential Gypsy and Traveller sites (September 2006). The Council recognises that future sites will have to be fully justified in terms of their impact. If exceptional circumstances are evident, pitches can be permitted in the Green Belt, particularly through a boundary change, or as an a rural exceptions site. No change. The policy reflects the reality of delivering sites.	

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			and against the policy criteria and not with reference to the Proposals Map or need.		It is reasonable and logical to ensure that need is directed to sites which are actually being identified and planned for. This helps provide certainty. Need is an important factor in justifying future provision, especially in Green Belt locations because new sites are recognised as inappropriate development. New sites are likely to have to be justified against need as an exception to normal restraint policies applying in the countryside, given the lack of available urban sites.	
			Will Policy CS22 be used to assess proposals for travelling showpeople?		No change. Any proposal for a new site would be judged against relevant criteria in the Core Strategy and national policies.	
Monitoring/Delivery		-				
15. Meeting community needs		8	Refer to the need to update the 2008 Open Space Study in the light of shortfalls in facilities and increased levels of participation in Tring.		No change. See response under paragraph 15.18.	
			The length of the document obscures its key themes and involves repetition.		The Core Strategy is of an appropriate length given its coverage of topics and achieving a reasonable balance between detail and conciseness.	
Figure 14		1	There should be greater consistency over the use of the terms social, leisure, cultural and community facilities. [An all-embracing definition of community facilities is recommended as an alternative.]		Social infrastructure is the term used by the Council to describe the range of facilities and services covered in Figure 14 and in this section. A series of minor amendments is proposed to aid consistency and adhere to the Council's intended definition in Figure 14.	MC28 MC29 MC30 MC31 MC32 MC33 MC35 MC36
Delivering community services: 15.1-17	15.7	1	The identification of the Education Zones is contrary to national policy and should be deleted.	S	No change. Government policy requires authorities to plan positively for schools. There are exceptional circumstances, particularly in Berkhamsted, where a departure from standard Green Belt policy is necessary to give greater certainty to and flexibility in school planning. The approach responds to an identified growth in school places highlighted by the Local Education Authority. Policy CS23 balances control with flexibility to respond to proven education needs.	
	15.12	1	Greater clarity of policy on healthcare provision is required.		No change. The responsibility of health care provision lies with the relevant health agencies. The role of the Core Strategy is not to determine health care policy itself, but to reflect and respond to it in spatial planning and land use terms.	
Delivering leisure facilities: 15.18-25	15.18	4	Refer to the need to update the 2008 Open Space Study in the light of shortfalls in facilities and increased levels of participation in Tring.		No change to paragraph 15.18. It is acknowledged that the studies were completed at particular points in time, and some review or updating will be appropriate from time to time. The Council considers it is important that sporting issues are fairly reflected both across Dacorum and at Tring. The Core Strategy includes the relevant strategic objective and policy (CS23). Specific issues at Tring are addressed	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
					under 22. Tring Place Strategy. See the response there and the minor changes proposed.	
	15.21	1	Refer to the Green Belt and countryside policies in the case of new schools being proposed outside of existing settlements. [It is assumed that indoor sports facilities would be included.]		No change. The Core Strategy should be read as a whole. Such facilities would normally need to comply with countryside/ Green Belt policies and standards. Some school sites benefit from designation as a major developed site in the Green Belt (Policy CS5/Table 2) which would allow flexibility to accommodate some development. Two education zones are currently proposed at Berkhamsted.	
	15.22	1	Refer to the need for the Council and the Cultural Forum to support tourism.		No change. The Core Strategy already makes clear how it will support development opportunities for tourism and how it will also work with the public and private sectors to promote tourism. This does not preclude working with other community organisations. The Council is also developing a tourism policy statement.	
			Refer to tourism being strongly linked to the cultural assets of Dacorum and its people.		No change. The Core Strategy already sets out that tourism and culture are interlinked.	
	15.23	1	Refer to increasing awareness and participation in countryside activities, local food production provision and opportunities for cultural celebrations.		Agree.	MC34
	15.24	2	The Council should set out a clearer role as to how it will support cultural activities.		No change. The Core Strategy explains how it will support cultural activities through development and land use policies. The details of any role can reasonably be pursued outside of the Core Strategy in conjunction with the public, business and community sectors.	
			Refer to the provision of a new performing arts venue.		No change. A generalised reference to cultural activities can include performing arts. However, the Council can only seek to accommodate what is realistic in terms of resources and opportunity. Current efforts are focussing on improvements to the Old Town Hall, not a new purpose built theatre, and the production of various forms of entertainment across Hemel Hempstead.	
Policy CS23		9	The underlying evidence base in relation to sports facilities is not sufficiently robust to justify the proposals in the policy and should either be: • updated; or • the Core Strategy amended to refer to a formal commitment to prepare a revised assessment within an agreed timescale.		No change. Current technical information is considered to be adequate to support the Core Strategy. In addition, in Hemel Hempstead, a more up to date audit was carried out of indoor and outdoor sports facilities through the Town Stadium Study (2009). A facilities improvement strategy is also due for completion. The Council will consider when to update the sports facilities studies to support future planning documents, and will explore whether CIL monies could be directed towards new sports provision.	
			Should any new school be built on brownfield sites, or can Green Belt land be used?		No change. Government policy requires authorities to plan positively for schools. There are exceptional circumstances, particularly in Berkhamsted, where a departure from standard Green Belt policy is necessary to give greater certainty to and flexibility in school planning. The approach responds to an identified growth in school places highlighted by the Local Education Authority. Policy CS23 balances	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				control with flexibility to respond to proven education needs. In most cases school places can be accommodated on school sites within the urban area. However, in some settlements demand can only be met on schools sites within the Green Belt given the location of the catchment area, and the restricted number and nature of existing sites within the urban area. See response under paragraph 15.7 also.	
		Should reference to education zones be removed?	S	No. The identification of the zones reflects close and recent working with the County Council as to how best current identified demand can be met within existing school sites in the Green Belt. It would not rule out other sites being brought forward with the support of the County Council if there is clear evidence of need and if circumstances justify.	
		Should planning constraints on schools in the Green Belt be any less robust than those for housing?		No change. See responses above. There are controls on the extension and development of schools in the Green Belt (and elsewhere). Any development within the Green Belt, including in the education zones or on major developed sites will be subject to normal planning considerations in terms of design, layout and access.	
		The need for children to travel greater distances to school will increase because of the level of housing provided.		No change. See responses to Policy CS17 for arguments regarding the level of housing growth. Travel will not necessarily increase. School planning is the responsibility of the County Council. The Council is working closely with them as to how new school places can be provided in relation to housing growth over the plan period. The role of the Core Strategy is to plan positively, and to relate education infrastructure provision with demand.	
		Multiple use of a performing arts venue should not undermine its ability to provide facilities for major touring companies.		No change. See response to paragraph 15.24 above.	
		The policy is unduly prescriptive by requiring multifunctional use of space and the dual use of new and existing facilities.		No change. This is a reasonable approach to planning for new social infrastructure. The policy encourages effective use of community space, particularly larger scale premises, for a variety of activities. The policy reflects the demand for and the difficulties of securing this type of facility. It seeks to encourage multipurpose and dual use of buildings; it is not mandatory; and individual circumstances need to be considered. The Council understands, for example, that dual use of some places of worship is not practical.	
		Any financial contributions under the policy should be subject to viability and deliverability of the development and independent verification. Refer to the need of West Herts College to deliver a new facility within		No change. An appropriate level of contribution to help provide social (or other) infrastructure is reasonable. The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The community infrastructure levy charging schedule will be subject to specific Examination (like the Core Strategy). No change. Policy CS23 and Section 15 adequately	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
		the town centre.		introduce and cover social infrastructure. Greater detail on specific development opportunities is and will be provided elsewhere in the local planning framework. West Herts College campus is covered in the Hemel Hempstead Place Strategy.	
		A more flexible approach is needed to alternative use and redevelopment of surplus or redundant land, including the importance of providing other uses as enabling development.		No change. Development should normally contribute towards social infrastructure. This may, for example, be through the community infrastructure levy (or similar) or by retention of a facility in a mixed use scheme. The ability to deliver social infrastructure will vary across schemes: each will be judged individually.	
Monitoring/Delivery	-				

- Looking After the Environment

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Looking after the Environment		_				
Strategic Objectives		1	Refer to maintenance and suitable management.		No change. The objective and supporting strategy provide the right direction.	
16. Enhancing the natural environment		1	See under Monitoring/Delivery		- To right through	
Text: 16.1		_	l l l l l l l l l l l l l l l l l l l			
Protecting/improving the landscape: 16.2-8 ¹	16.2	1	Use correct name for the Chilterns character area		Agree.	MC37
	16.3	1	Recognise the Chilterns Area of Outstanding Natural Beauty (AONB) as an asset of green infrastructure (GI)		No change. The AONB is appropriately identified.	
	16.5	2	Refer to Landscape Character Assessment (LCA)		Agree.	MC38
			Refer to landscape assessment and mitigation.		No change. This is adequately covered elsewhere, including through the use of the LCA.	
Map 2	•	1	Select consistent landscape descriptions.		No change. Descriptions are appropriate to Dacorum	
·			Correct map and show Aldbury Nowers as a scarp slope.	S	Agree.	MC39
Green infrastructure: 16.9-16 ¹	16.10	1	Is biodiversity adequately reflected in the description of GI?		Yes. See paragraph 16.17 for example. No change.	
	16.13	2	Add farming and forestry to the list of GI support systems.		No change. Detail is more appropriate to supporting policy.	
			Extend definition of wildlife corridors.		No change. Detail is more appropriate to supporting policy.	
			High level and local GI links should mesh.		The planning framework as a whole will aim to do this.	
	16.14	1	Discuss levels of GI deprivation or standards for accessible natural		No change. Adequately covered in evidence such as the	
			greenspace.		Urban Nature Conservation Study.	
			Refer to the management of GI sites.		No change. Careful land management is a key principle already. Supporting policy and future guidance will elaborate.	
	16.16	1	Refer to the local food initiative.		No change. Adequate reference is made to the principle of local food production elsewhere.	
Map 3	-U	5	Correct inconsistencies between map and key.		Agree.	MC40
•			More accurately depict the Tring – Wendover GI link.		Agree	MC40
			Add GI south of Berkhamsted, which would be provided as a result of a new housing development.		No change. The map has sufficient detail. Furthermore, housing is not proposed by the Core Strategy.	
			Include the AONB.		No change. The AONB is appropriately identified in other maps and diagrams. The map shows GI, including aspects of the AONB, at a district scale.	
			Include long distance paths.		No change to Map 3. However all relevant paths, including Icknield Way, will be shown in Figure 28.	MC101
			Include Hemel GI heritage project		No change. This will be a significant project, together with others covered in supplementary guidance (ref Policy CS26)	
			Are local wildlife corridors at Tring appropriately covered?		Yes. Selected corridors are shown on Map 3 as a link with strategic corridors and areas of biodiversity opportunity. Figure 24 has local detail. More will be said in supplementary guidance (ref Policy CS26).	
			Should a strategic wildlife corridor be identified at Gaddesden Row (north of Hemel)?		Yes. Evidence is provided in the Urban Nature Conservation Study prepared by the Council's ecological adviser. Hence, no change.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
			Discuss Chilterns Beechwoods and SSSIs further.		No change to Map. However, see response under paragraph 16.17 below and proposed changes.	
Biodiversity/geological conservation:16.17- 24 ¹	16.17	3	Should geology be considered outside GI, or are biodiversity and geology essential components of GI?		Agree latter principle.	MC41
			Discuss Chilterns Beechwoods and SSSIs further.		Reference will be made to the most important of the recommendations from the Habitats Regulations Assessment (2010) and the principles to be applied when considering impacts on wildlife sites. Statutory designations will be referred to in the Glossary. Saved policies in the Local Plan are also relevant to the protection of important wildlife sites.	MC41 MC42 MC51 MC102 MC105 MC106
	16.18	1	There is no overlap between Wildlife Sites and SSSIs any more.		Amend text accordingly.	MC44
	16.19	1	Can the wording be improved?		Some change is appropriate. Refer to Figure 15 designations and to streams suffering from over-abstraction.	MC45
	16.20	2	Are the stated locations of the main habitat fragmentation accurate?		Amend reference. The east of the Borough and Hemel Hempstead are the most affected areas.	MC46
			Mention the Living Landscapes Project (which encourages broader scale land management).		It is appropriate to refer to broad scale initiatives, both current and potential.	MC47
			Doubt expressed about water supply and the health of the chalk streams. Hence restrict development until new supplies are provided.		No change. The aims and approach of the Core Strategy are appropriate. They have been derived from consultation and collaboration with the water utilities and advisers.	
	16.21	1	Extend reference to key biodiversity areas to encompass a variety of current and potential large scale biodiversity initiatives.		Agree. Refer to broad scale initiatives, both current and future action, and how these might be taken forward.	MC47 MC51
	16.22	1	The Sustainability Offset Fund should be used for a variety of habitat improvements.		A general reference to habitats is appropriate.	MC48
	16.23	1	Refer to a wider range of large scale biodiversity initiatives.	S	Agree.	MC47
	16.24	1	More research on geology is available: two additional sites of geological importance (RIGGSs) have been identified.		Amend text to reflect updating. Also amend the Countryside Vision diagram to show the appropriate RIGGSs.	MC43 MC49 MC101
Figure 15		1	Should the designations be simplified into three tiers, and/or should local informal descriptions, such as wildlife corridor, be included?		The figure refers to the appropriate, specific designations. However minor modification would be helpful.	MC50
Policy CS24		1	Add "and enhanced" to the first sentence.		Although no change to the policy is needed, the Council acknowledges it has a role to conserve and enhance the natural beauty of the AONB. Policy is aimed to achieve this. The role and responsibilities of the Council and Chilterns Conservation Board will be included in the Glossary.	MC103
Policy CS25		1	Can development be expected to conserve and enhance the landscape? Or should it be seeking to limit harmful impacts?	S	No change. The first sentence of the policy is an important strategic statement. The location, design and management of development can and should be approached positively. Even the consideration of impacts can be considered constructively.	
Policy CS26		3	Include biodiversity in the title.		This is not necessary. No change.	
			The policy should state it supports monitoring and updating of the biological record.		No change. This is effectively supported by monitoring and delivery actions with the policies.	
			Insert clause preventing harm to geological conservation.		No change. There are four RIGGSs. Their conservation is adequately covered by the policy and through supporting	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
				policies, e.g. the saved Local Plan and future supplementary guidance. Policies CS24 and 25 are also important because they relate to landform.	
		Refer to the strategic GI status of the Chilterns AONB (here or elsewhere).		No change. The AONB is appropriately covered by Policy CS24 and through other policies of the Core Strategy.	
Monitoring/Delivery *[the number of objections is covered under Section 11 heading]	*	Monitor the condition of wildlife sites, especially statutory sites, as well as their extent.		No change. Monitoring indicators are necessarily selective. They have been agreed with the Council's ecological adviser, reflecting what is reasonable to assess the success of Policies CS24-26 and what is likely to be available.	
17. Conserving the historic environment	_			of Folicies C324-20 and what is likely to be available.	
Text: 17.1-17 17.5	1	Refer to poorly designed buildings (instead of characterless).		No change. The current reference is appropriate.	
Policy CS27	3	Refer to heritage (rather than historic) assets.		Amend in the Policy and paragraph text and define the term in the Glossary in accordance with Government advice.	MC52 MC53 MC54 MC55 MC104
		Refer to ongoing appraisals informing future designations and management plans. Features in the New Town are cited as an example.		Agree in principle. Changes are more appropriate to the text and delivery paragraphs rather than the policy. The approach would apply district-wide, including the New Town.	MC52 MC55
		Does the policy adequately cover undesignated heritage assets with archaeological interest?		Yes, as a strategic policy. The Local Plan also contains relevant saved policies which will be reviewed and updated.	
		Do not give undesignated heritage assets blanket protection.	S	No change. The policy does not give blanket protection to all historic/heritage features. However, conservation of assets, which are features of particular value, is favoured.	
		Should development be considered as a positive force or simply not be negative?		No change. The Council considers the general attitude and approach should be positive.	
		Should development be capable of conserving and enhancing conservation areas, or are the two mutually exclusive?		No change. This is a strategic policy and in general development should perform both functions. An individual development could achieve either or both: the two are not mutually exclusive.	
M		Does the policy give sufficient guidance to the possibility of different design approaches?		No change. The policy is appropriate and refers to further guidance being provided. There are also relevant saved policies in the Local Plan.	
Monitoring/Delivery 18. Using resources efficiently	-				
Text: 18.1-11	-				
Figure 16	_				
Renewable energy: 18.12-18 18.13	1	Also refer to the Chilterns Area of Outstanding Natural Beauty (AONB) and constraints on the harnessing of wind power.		Update and amend accordingly.	MC59
Map 4	-				110-5
Table 11	3	Table 11 introduces a "local building byelaw". Is the rate of progress to achieve zero carbon buildings appropriate? Would the increased rate overburden housebuilders?		Retain Table 11. The Council is under a responsibility to promote sustainable development. It must assess its draft policies to ensure that its policies are as sustainable as they can reasonably be. Some modification to refer to stages of change towards the achievement of zero carbon buildings would however be appropriate. Further explanation of the	MC56 MC57 MC58 MC60 MC61 MC64

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
					stages of change and the way the Council will interpret its approach towards zero carbon buildings would be beneficial. There should also be clearer reference to supplementary advice.	
			Should the additional 5% reduction requirement for carbon emissions on large developments be removed?		No. See response to Policy CS29.	
			Is the concept of district heating opportunity areas sound?		Yes, in locations suggested by the evidence of the Low and Zero Carbon Study (see Map 4). Further advice will be necessary to fully implement the policy approach.	
Sustainable design/construction:18.19-26	18.19	1	Design housing with living areas most used upstairs.		No change. This level of detail is not appropriate to the Core Strategy. Architects can however consider the option as part of their designs, e.g. in meeting policy CS29.	
	18.23	2	Is there an overemphasis on carbon emissions compliance? Refer to sustainability statements covering a range of issues, including habitats and ecosystems.		The reduction of carbon emissions is an important issue. Paragraphs 18.19-18.23 are all relevant to what is covered in a sustainability statement. However, elaboration of the text would help. The criteria in Policy CS29 cover a range of matters. A criterion relating to biodiversity would be a relevant addition.	MC62 MC64
			Do not require small developments to provide a sustainability statement and carbon compliance check.		No change.	
			Use the sustainability offset fund for a range of sustainability improvements, including enhancing biodiversity.		No change. Policy CS29 explains when payments in to the Sustainability Offset Fund will be sought. Policy CS30 guides the use of the Fund. It is appropriate that any payments should be used for the reason they were raised. It is accepted that new tree planting, for example, should be in appropriate places.	
	18.24	1	Is there an overemphasis on carbon emissions compliance?		No. See responses above.	
	18.25	1	Is there an overemphasis on carbon emissions compliance?		No. See responses above.	
	18.26	1	Correct reference to sustainability offset fund.		Update and amend paragraph 18.25 accordingly.	MC63
Policy CS28		6	Should the policy refer to viability considerations and testing? Avoid stifling economic development. For example, if development at Maylands Business Park is not freed from additional financial burdens, the area will become uncompetitive with other office locations.		No change. This is appropriately covered by Policy CS29. Agree in principle. See response to Policy CS29.	MC58
			Is the rate of progress to achieve zero carbon buildings appropriate? Would the increased rate overburden housebuilders?		The range of change is appropriate in Dacorum. Monitoring of applications is in place as a check. There are safeguards in the policy to ensure development is viable.	
			Should the additional 5% reduction requirement for carbon emissions on large developments be removed?		No. See response to Policy CS29.	
Policy CS29		11	Is the Core Strategy sufficiently flexible? Should timescales for the introduction of new standards (as in Table 11) be given?		The Council is under a responsibility to promote sustainable development. While it is reasonable to progress at a faster than minimum pace to zero carbon buildings, the exact timetable set by the Government (which the Council will use as a prompt) may vary compared to that currently expected. The Government's intentions towards the achievement of carbon neutral development will be clarified and evolve over the lifetime of the plan. The Core Strategy must be	MC56 MC57 MC58 MC60 MC63 MC64

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				sufficiently flexible to deal with that. The Council is required to assess its draft policies to ensure they are as sustainable as they can reasonably be. Some modification to refer to stages of change towards the achievement of zero carbon buildings would be appropriate. Further explanation of the stages of change and the way the Council will interpret its approach towards zero carbon buildings would be beneficial. There should also be clearer reference to supplementary advice.	
		Should the policy refer to viability considerations and testing? If so, how? Would costs be excessive?		The policy refers to viability. Minor changes to clarify the test in the policy and to ensure a sensitive approach to viability would be beneficial.	MC58 MC64
		Will community infrastructure levy be additional to sustainability payments?		This will be determined through the preparation of further guidance. The Council's intention is not inhibit development, but to ensure it is of the highest standard and provides the appropriate contribution towards infrastructure. The Council's approach to viability is to take account of all additional costs and financial contributions, and the character of the development.	
		Is the rate of progress to achieve zero carbon buildings appropriate? Would the increased rate overburden housebuilders?		The range of change is appropriate in Dacorum. Monitoring of applications is in place as a check. There are safeguards in the policy to ensure development is viable.	
		Avoid stifling economic development. For example, if development at Maylands Business Park is not freed from additional financial burdens, the area will become uncompetitive with other office locations.		The principle is accepted. A change to the paragraph text would be appropriate.	MC58
		Should the additional 5% reduction requirement for carbon emissions on		No. This is a modest target which experience has so far	
		large developments be removed? Should any or all of the criteria (a) to (k) be deleted?	S	shown can be met. No. The criteria are all important considerations in assessing development proposals and their contribution to sustainability.	
		Should reference to Table 11 be deleted?		What the Council intends by minimising carbon emissions can be better explained in Table 11 and the text in paragraphs 18.11 – 18.18.	MC56 MC57 MC58 MC63 MC64
		Should a site waste management plan (or similar) be referred to?		Yes. Also see response under paragraph 18.39.	MC61
		Use the Building Regulations for fabric insulation and water usage?		No change. While the Building Regulations are highly pertinent, they are not the sole reference.	
		Should all reference to applicants explaining how their proposal has been 'future-proofed', including reference to life time of the building, recycling of materials and retrofitting to enable higher future standards to be met, be deleted?	S	No. The policy is long term and it is reasonable that applicants think about the impact of their proposals. New development should potentially be able to cope with newer practices. If not, designs will be obsolete very quickly and development will fail to deliver all the potential sustainability benefits.	
		Should the policy refer to possible connection to a decentralised heating system?	S	Yes. The policy is long term and must be able to cope with newer development and practices: more decentralised	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					heating systems are envisaged in the future and good use should be made of them.	
			Is relaxing the principles of the policy technically feasible?		Yes. It may be necessary in order to allow development.	
			Do not pay into the sustainability offset fund if scheme is unviable.		This may be a logical outcome. The need for offset payments should be considered before the question of viability. Payments could then be set aside if they rendered a scheme unviable. A change in policy wording would help understanding.	MC64
			Should Policy CS29 (and CS28) take precedence over urban design and historic environment policies?	S	No. The policies should be weighed up together.	
Policy CS30 *[includes objection to Monitoring	/Delivery]	3*	Is the Core Strategy sufficiently flexible? Should timescales for the introduction of new standards (as in Table 11) be given?		No change to Policy CS30. See response to Policy CS29 above.	
			Use the sustainability offset fund for a range of sustainability improvements, including enhancing biodiversity.		No change. Policy CS29 explains when payments in to the Sustainability Offset Fund will be sought. Policy CS30 guides the use of the Fund. It is appropriate that any payments should be used for the reason they were raised. It is accepted that new tree planting, for example, should be in appropriate places.	
Monitoring/Delivery			Correct reference to the waste strategy.		Agree.	MC65
Sustainable resource managem't:18.27-41	18.29	1	Need out-of-area water supply.		No change. The responsibility for new supplies rest with Veolia. Other measures affecting the water environment can help – for example water efficiencies in new development, reduction of leakage and retention of rainfall within the local, natural environment. It is therefore important that the Council continues to work closely with the water utilities and advisers.	
	18.34	1	How will water supply and sewerage cope with additional development?		No change. The aims and approach of the Core Strategy are appropriate. They have been derived from consultation and collaboration with the water utilities and advisers. Additional infrastructure will be needed and will be planned with the relevant providers. Water efficiency in new development and other measures will help.	
	18.35	1	Refer to sewerage network investigations in other parts of "the study area" (i.e. south/west Herts).		Agree.	MC66
	18.37	1	Address existing water cycle issues.		No change. The paragraph does not refer to development but the aims of actions to be taken with other agencies. It is highly relevant.	
	18.38	1	Refer to light zones and other guidance in the Core Strategy, or refer to supplementary guidance on the control of light pollution.		No change. Saved policies cover the subject fully. The reference in CS32 will be the hook for updating the saved policies through the Development Management DPD.	
	18.39	1	Refer to site waste management plans.		Amend text under sustainable design and construction accordingly.	MC61
	18.40	1	Correct waste planning references.		Agree.	MC68
Policy CS31		2	Will new development undermine the policy?		No change. The policy is concerned with the water environment and how water is managed in that environment. It will be relevant whether development targets are higher or	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				lower. The first part of the policy is strategic and sets out the agreed ambitions of the authorities involved in the water environment, particularly the Environment Agency. The second part will help assess the effects of new development and limit its impact.	
		Amplify criterion (a).		No change. The policy is appropriately worded.	
Policy CS32	3	It will be relevant whether development targets are higher or lower. Will new development undermine the policy?		No. The policy will help assess the effects of new development and avoid pollution. It will be relevant whether development targets are higher or lower.	
		Add detail on light pollution.		No change. Saved policies cover the subject fully. The reference in CS32 will be the hook for updating the saved policies through the Development Management DPD.	
Monitoring/Delivery	-				

Note:
The paragraph numbers are as stated in the printed version of the Core Strategy. Unfortunately, there was an error in setting up Objective, the Council's consultation database, where paragraph 16.6 was incorrectly subdivided (and subsequent paragraphs all out by one). Despite this numbering error, all submissions are with the correct text in Objective; all issues are attributed to the correct paragraph in the printed version of the Core Strategy; and any minor changes (in Table 3) are with the correct Core Strategy text.

- Place Strategies

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
Place Strategies		-				
19. Introduction to Place Strategies		-				
Text	19.7	1	Delete reference to the local allocations.		No change. They are a significant element of particular place strategies.	
Common Local Objectives		2	Fifth objective: conserve, not maintain, and enhance the various assets listed.		No change. The objective is broad based and appropriately worded.	
			Eighth objective: refer to horse riders and carriage drivers.		No change to objective which is appropriately worded. However the principle of equine/equestrian activities deserves fuller mention in the Countryside Place Strategy.	MC99
20. Hemel Hempstead		5	Provide more cultural facilities and revitalise the town centre.		No change. These are aims of the Council and are being pursued. What is deliverable will depend on resources available to the Council and other parties, and economic circumstance.	
			Refer to the Council's evidence base, in particular the retail study update.		No change. The evidence base helps to justify the policies and does not need to be repeated in the Core Strategy.	
			Reallocate Frogmore Road (Apsley) for housing.		No change. This can be considered through the Site Allocations DPD.	
			Provide space for more than one primary school in the town.		This is being planned for, and is referenced under the Local Objectives. No change to the Core Strategy is needed.	
			Draft a new policy for Apsley, promoting Apsley Mills as a mixed use area.	S	No change. It is not necessary for a new policy for Apsley. Apsley Mills can be considered through the Site Allocations DPD.	
			Give more weight to the heritage of paper making and the canal at Apsley.		Include reference to the paper making heritage in the strategy for the town. Otherwise sufficient reference is made in the Core Strategy to both.	MC69
			Support housing/business expansion into St Albans (particularly east of Spencers Park and Maylands Business Park): this should not have been dismissed as an alternative due to lack of co-operation between Dacorum and St Albans Councils.		No change. See response under paragraph 20.17.	
			Should the principle of Dacorum's development needs being met in St Albans be agreed through the Core Strategy?		No change. See response under paragraph 20.17.	
Context:20.1-5	20.4	1	Mention noteworthy features of the New Town which can contribute to regeneration.		No change. The Council's regeneration ambitions are covered appropriately.	
	20.5	1	Add references to historic/architectural distinctiveness.		No change. The Council's regeneration ambitions are covered in appropriate detail.	
The Visions	•	3	Do not refer to more development because local infrastructure cannot cope.		No change. The vision sets out how things should be.	
			Meet borough housing requirements and plan for the growth of the town centre.		No change. The town vision is appropriately expressed. It should tackle housing and economic challenges rather than simply meet borough housing requirements. There is a more detailed vision for the town centre.	
			Refer to a transport assessment being made of the North East Hemel Hempstead relief road.		No change to vision, which is appropriate in intent and level of detail. However amend text concerning East Hemel Hempstead to cover the principle raised: refine paragraph	MC17 MC76

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
					text in Section 9 which covers transport assessments. Also see response under Policy CS34.	
Local Objectives	00.0	-	Oh annua tha laval and manuation of new house	0	No shares. The Oscardilla act are said a said labor.	
Delivering the town strategy: 20.6-11	20.6	2	Change the level and proportion of new homes.	S	No change. The Council is not proposing any higher development figure at Hemel Hempstead.	
	20.9	1	Reinstate bus service connecting Old Town with the main station and town centre.		No change. This is a matter for the urban transport plan.	
Delivering the town centre: 20.12-13	20.12	1	Insert statement on archaeology – the presence of heritage assets being a constraint in two zones.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. The Town Centre Master Plan can include suitable reference. This is sufficient.	
	20.13	1	Refer to zones contributing different values and complementing each other: ensure development in one zone is sensitive to the adjacent zone(s).		Agree.	MC70
Figure 17		3	Old Town Zone: add text on the public realm and sensitive improvements.		Agree in principle. Reference should also be made to the protection of open land which is part of the setting for Gadebridge Park, the old town and its High Street. As the Council has included this area within the Master Plan, Figures 17 and 21 should be amended accordingly.	MC71 MC80
			Original Old Marlowes Zone: add text, particularly noting its role as a link between the old and new town.		Agree in principle.	MC72
			Jellicoe Water Gardens Zone: emphasise the significance of this public space and its sensitivity to large scale development.		Agree in principle.	MC73
			Gade Zone: broaden the range of uses permissible in the zone to enable delivery of a new college.		While the town centre is a mixed use area, it is large and serves a number of different purposes. The policy quite reasonably gives some guidance on opportunities for particular types of use and character of development. More detailed policy and action will come through the Town Centre Master Plan. The appropriate range of primary uses is given for the Gade Zone.	
Delivering East Hemel: 20.14-19	20.14	1	Insert statement on archaeology – the presence of heritage assets being a constraint in some zones.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. The Action Plan can include suitable reference. This is sufficient.	
	20.17	1	Support housing/business expansion into St Albans (particularly east of Spencers Park and Maylands Business Park): this should not have been dismissed as an alternative due to lack of co-operation between Dacorum and St Albans Councils.	S	No change. The development needs identified in the Core Strategy can be met within Dacorum. The Council is working with St Albans Council over the planning of East Hemel Hempstead. It agrees with that authority that there is no good reason at present to roll the Green Belt boundary back to the M1. The issues that need to resolved using land in St Albans are mostly compatible with Green Belt designation. The Council considers that what is planned to 2031 should allow for possible future extension of the town in the Wood	

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				End Farm area. If and when Hemel Hempstead is required to expand, this area would be the Council's first choice. To that extent it agrees with the objector.	
		Should the principle of Dacorum's development needs being met in St Albans be agreed through the Core Strategy?	S	No change. The Council is doing this with St Albans Council.	
Figure 18	3	How far will the principles in Figure 18 restrict development?		No change. See response under Policy CS34.	
		Is the Maylands Master Plan preferable to Figure 18?		No change. See response under Policy CS34.	
		Allow greater flexibility for B1(c), B2 and B8 (industry and storage) uses in the Face of Maylands.		No change. See response under Policy CS34.	
		Allow offices in Service Centre (Boundary Way East near Buncefield)		No change. The character of this area is broadly set in Figure 18. While Maylands Master Plan adds detail and allows for office redevelopment, the character of the area will be guided by the normally predominant use – storage, distribution and warehousing	
		Refer to park and ride facilities being subject to transport assessment.		No change to Figure 18, which is appropriate in intent and level of detail. However amend text concerning East Hemel Hempstead to cover the principle raised: refine paragraph text in Section 9 which covers transport assessments. Also see response under Policy CS34.	MC17 MC76
Policy CS33	5	Refer to a performing arts venue.		No change. The generalised reference to cultural facilities could include a performing arts venue. However, the Council can only seek to accommodate what is realistic in terms of resources and opportunity. Current efforts are focussing on improvements to the Old Town Hall, not a new purpose built theatre.	
		Add text referring to heritage assets.		No change. The policy covers use, movement and design in sufficient detail already. This detail is more appropriate to the Town Centre Master Plan.	
		Add a movement criterion: enhance public transport links between the town centre, main station and Maylands.		No change. This is one of the local objectives. Securing public transport facilities in the town centre and at Maylands will contribute towards the achievement of that objective.	
		Reinstate the reference to the provision of a bus station.	S	No change. Criterion (a) is appropriate. A purpose built bus station is not necessarily required.	
		Undertake additional traffic modelling to assess the impact of proposals in the town centre.		An access and movement study is being carried out as part of the work on the Town Centre Master Plan.	
		Is the policy sufficiently flexible to respond to development opportunities?		Yes. While the town centre is a mixed use area, it is large and serves a number of different purposes. The policy quite reasonably gives some guidance on opportunities for particular types of use and character of development. More detailed policy and action will come through the Town Centre Master Plan.	
Policy CS34	5	How far will the principles in Figure 18 restrict development? Is designation of the Maylands as a green business park too restrictive?		The Council will take a considerate approach to the needs of business. The purpose of policy is to give some guidance on opportunities for particular types of use and character of development. It is important to set the principles for key areas. The badging of Maylands as a green business park	

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				sets a character and ethos which is intended both to encourage business and set the Council's intention to pursue sustainable economic development. This will be interpreted sensitively and tempered by the need to secure jobs. The alternative is 'laisser faire' which would be difficult to manage, and can have unpredictable effects.	
		Should the policy adapt to the continuing needs of business?		No change to Policy CS34. Policy is intended to be broad based and flexible to different economic circumstances – propriety as well as recession. Supporting the delivery of infrastructure and new housing (at Spencers Park and the Heart of Maylands for example) will ultimately help businesses. Also see response above.	
		Is the Maylands Master Plan preferable to Figure 18? Allow greater flexibility for B1(c), B2 and B8 (industry and storage) uses		No change. The Master Plan provides additional guidance for the time being and is not an alternative. No change. This is not precluded and is a possibility	
		in the Face of Maylands.		particular in less prominent areas, including the northern end of Maylands Avenue. The Master Plan provides additional guidance for the time being.	
		Diversify employment uses in the Gateway.		While it is important to give a general direction in Policy CS34, the Council will respond positively to this matter through revisions to the Gateway development brief. A minor change to Figure 18 will allow further flexibility.	MC77
		Allow vacant office floorspace to be converted to housing in appropriate locations.		No change to Policy CS34. The more practical opportunities are likely to fall within the main centres. Some diversification is encouraged in Maylands, particularly around the 'Heart of Maylands', and areas closer to existing residential areas.	
		Should criterion (c) on district heating/renewable energy technologies be retained? Will they impact on the viability of proposals hindering economic development?		No change to Policy CS34. However the issue of viability is an important one. It is referred to in Policy CS29 and amendments to that policy and text in Section 18 will underline the importance of a sensitive approach which does not undermine development.	MC58 MC64
		Add a movement criterion: enhance public transport links between the town centre, main station and Maylands.		No change. This is one of the local objectives. Securing public transport facilities in the town centre and at Maylands will contribute towards the achievement of that objective.	
		Refer to the impact of the extra jobs on the primary road network (M1/A414) being subject to transport assessment.		No change to Policy CS34, which is appropriate in its coverage. However amend text concerning East Hemel Hempstead to cover the principle raised. Also refine paragraph text in Section 9 which covers transport assessments. The issues can be considered further in the context of the East Hemel Hempstead Action Area Plan. Modelling work undertaken by both the local highway authority and Highways Agency can help in this regard. The Council agrees it is important to plan East Hemel Hempstead up to 2031and beyond. Park and ride and additional lorry facilities are intended to manage existing traffic rather than attract extra. The North East Hemel Hempstead relief road is	

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				current Local Plan, and will be delivered alongside the development of Spencers Park.	
Monitoring/Delivery	-				
Proposal LA1	19	Delete the local allocation: various general reasons are put forward - examples: - Impact on the Green Belt - Impact on the Gade Valley - Loss of the separation of the town from Piccotts End.		No change. Local allocations are needed to meet the housing target. This location was recommended by the Planning Inspector who conducted the inquiry on the Local Plan. The definition of the site, the scale and siting of development and the quality of the accompanying landscape strategy will help to limit the impacts.	
		Delete the local allocation: various detailed reasons are put forward – examples: - Height of buildings - Effect on the landscape and need for more tree planting - Impact on a historic park/garden - Effect of vehicular access into Grovehill.		No change to development principles. The matters listed and other potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). These matters will all be subject to consultation.	
Proposal LA2	41	Delete the local allocation: various general reasons are put forward - examples: - Impact on the Green Belt and Gade Valley - Loss of the separation of the town from Piccotts End - Loss of leisure/green space - Impact on the Old Town conservation area.		No change. Local allocations are needed to meet the housing target. This site is likely to be the lowest priority of the three at Hemel Hempstead. The scale and siting of development and the quality of the accompanying landscape strategy will help to limit the impacts.	
		Defer consideration of LA2 until the Site Allocations DPD.		The Core Strategy is the appropriate place to reach the initial decision. Detailed consideration will then be made at the Site allocations stage.	
		Delete the local allocation: various detailed reasons are put forward – examples: - Height of buildings - Control over the type and character of building - Effect on the landscape and need for more tree planting - Effect of traffic on the historic High Street - Effect on the gateway to the Old Town - Flood risk from run-off - Potential for archaeological finds - Effect on residential amenity.		No change to development principles. The matters listed and other potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). These matters will all be subject to consultation.	
Proposal LA3	5	Delete the local allocation because of the impact on the Green Belt, for example.		No change. Local allocations are needed to meet the housing target. The definition of the site, the scale and siting of development and the quality of the accompanying landscape strategy will help to limit the impacts.	
		Is the housing target appropriately expressed? Should it be lower?		No change. The level is appropriate to the area and has the scale to create a new neighbourhood. It is however important there is a limit because there are issues to address in order to assimilate the new development.	
		Refer to the proximity of the Chilterns AONB.		No change. This is unnecessary.	
		Avoid three storey building in the north west field. Insert criterion seeking a transport assessment of the impact of	S	Agree. This will be covered in more detailed guidance with the Site Allocations DPD. No change to LA3. This is a detailed and possibly	MC17

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		development on Junction 20, M25.		unreasonable request: it can however be considered further through the Site Allocations DPD. A change to Section 9 will cover the issue of transport assessments more generally and apply to all development sites as relevant.	
		Reduce the affordable housing provision to about 35%.		No change. It is important that the largest sites deliver appropriate levels of affordable housing.	
		Ensure educational provision is proportionate to the development.		No change. This will be assessed at a later stage. The County Council currently advises that a two form entry school will be needed.	
Figure 19: vision - built	4	Identify Jarman Fields as a local centre with a district shopping function.	S	No change. Jarman Fields is, in fact, an out of centre retail and leisure location, which the Core Strategy recognises.	
		Add new local allocations – Nash Mills and Shendish.	S	No change. These are not proposed in the Core Strategy. They are not needed to meet the housing target.	
		Show the boundary of the Chilterns Area of Outstanding Natural Beauty.		No change. The addition of new open space does not justify the proposed development. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
Figure 20: vision - natural	4	Show the boundary of the Chilterns Area of Outstanding Natural Beauty.		No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
		Remove Open Land designation from land at Woodhall Lane.		No change to the diagram. Open Land is a long standing policy introduced in the Local Plan (adopted in 1995) and subject to consultation. The issue raised is a detailed point and should be considered through the Site Allocations DPD.	
		Include listed buildings and areas with archaeological potential (and retitle the diagram accordingly).		No change. The level of detail is inappropriate to a diagram, which combined with Figure 19 describes urban design for the town. The Proposals Map shows archaeological sites.	
		Include Shrub Hill Common LNR.		Agree – an element of urban green infrastructure.	MC79
		Correct the boundary of pingos on Boxmoor (a RIGGS)		Agree - a linked element of urban green infrastructure.	MC79
Figure 21: the town centre	1	Include the area around Two Waters Way as part of the town centre.	S	No change. The extension of the town centre would elongate the centre further and is not justified.	
Figure 22: East Hemel	2	Refer to land shown in St Albans as an indicative study area or similar, and explain what should be covered.		Amend diagram and paragraph text to address these points.	MC75 MC81
		Extend the boundary eastwards to the M1.	S	No change. The level of development proposed does not warrant rolling back the Green Belt in this way. See response to paragraph 20.17.	
21. Berkhamsted	4	Defer any further housing development until new water sources are provided, the chalk stream (River Bulbourne) is restored, flows in the stream and Canal are protected and water in them is of a good quality.		No change. Although some variation of flow in the Bulbourne is inevitable, this is recognised as an issue. The aims and approach of the Core Strategy are appropriate, both generally and in respect of Berkhamsted. They have been derived from consultation and collaboration with the water utilities and advisers. The responsibility for new water supplies rest with Veolia and the natural water environment with the Environment Agency. the implementation of measures affecting the water environment can help – for example water efficiencies in new development, reduction of leakage and retention of rainfall within the local, natural	

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				environment. It is therefore important that the Council continues to work closely with the water utilities and advisers. If additional water infrastructure is needed at Berkhamsted, it will be planned with the relevant providers.	
		Does the identification of the strategic site and local allocation provide the most appropriate strategy for Berkhamsted against alternatives? [Land south of Berkhamsted is suggested as a strategic development opportunity and new local allocation. Changes to the paragraph text under Delivering the Strategy are needed – this includes new paragraphs to explain aspects of the suggested development. Changes to existing paragraphs are considered under the relevant paragraph below.]	S	No. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. The impact on the Green Belt and green swathe between the town and the A41from proposals within the Core Strategy would be relatively modest: the impact of a new neighbourhood at south Berkhamsted would be substantial. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. This particular development suggestion is not needed; it would approximately double the level of development to come (to 2031). The pace of change would be damaging to the town's character – its traffic movement and central area, its green hinterland, its form and even options for growth beyond the plan period. The suggested local allocation is not accepted by the Council and the suggested paragraph text is therefore not needed.	
		Designate the potential extension of a housing site in Bank Mill Lane for housing (the extension is in the Green Belt). Designate Lock Field, New Road, Northchurch for housing – the merits of this site having been overlooked by the Council.		No change. This will be considered through the Site Allocations DPD. No change. The site is not needed to meet the housing objective for Berkhamsted. The Council considered the	
				merits of the site and its impacts through different stages of the Core Strategy.	
Context: 21.1	1	Mention Northchurch as a separate entity.		The town being planned for is Berkhamsted. Northchurch is a separate parish, both in the urban area and in the countryside. It has a small local centre within the town. Northchurch is referred to where appropriate.	
The Vision	-				
Local Objectives	5	Too many new homes will place burdens on roads and other local infrastructure: the condition of the public realm is worsening.		No change. The Council is working with the infrastructure providers to support new provision and investment in maintenance. Investment will be needed whether or not the number of new homes increases. The Council is proposing a modest level of growth. See response under paragraph 21.2 about the number of new homes.	
		Amend first objective to provide around 750 or 2,871 new homes.	S	No change. See response under paragraph 21.2.	
		Insert a new objective promoting an urban extension south of Berkhamsted.	S	No change. This is neither desired nor proposed in the Core Strategy.	
		Berkhamsted. Amend third objective to refer to a new primary school delivered with an		Strategy. No change. The amendment is inappropriate as it relates to	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			urban extension south of Berkhamsted.		an urban extension which is not part of the Core Strategy.	
			Amend last objective to increase employment provision with jobs appropriate for and accessible to the local population		No change to Berkhamsted Local Objectives. As there is no new employment area proposed, it is considered that the objective is appropriately framed.	
			Insert new objective supporting local food production and consumption.		No change to Berkhamsted Local Objectives. This is a detailed point, yet could apply more widely. The strategic and common local objectives are appropriately framed. Though not explicitly stated, they embrace the principle of local food production and consumption as far as considered practical. Strategic objectives 1, 9, 11 and12 are relevant. A change to the Borough Vision is sufficient.	MC5
Delivering the Vision: 21.2-14	21.2	8	Is the proposed dwellings level of 1,180 reasonable:	S	No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Berkhamsted. It has considered alternative levels against housing forecasts and the role of Berkhamsted in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of a relatively busy town and its infrastructure. The impact on the Green Belt and green swathe between the town and the A41 is relatively modest. The Council has inevitably assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected happens to approximate to past average delivery rates and is considered reasonable.	
	21.3	3	Remove LA4.		No change. The local allocation is required to meet the local housing objective and help continue supply in the longer term. Also see response under LA4.	
			Reduce the number of dwellings on SS1.		No change. The site is excluded from the Green Belt and is needed to meet the local housing objective. Also see response under SS1.	
			Undertake a full transport assessment before SS1 can be considered.		No change. The development will be subject to a transport assessment and agreement with the local highway authority on necessary highway works and contributions to transport infrastructure.	
			Identify land south of Berkhamsted as a local allocation to meet housing need/demand and provide social and transport infrastructure for the town. [A description of a 'new' local allocation is given together with amendments and additions to text under Delivering the Vision.]		No change. The impact of a development of this scale is unwarranted. It is not needed to meet the local housing objective – also see response to paragraph 21.2. The provision of social and transport does not justify the level of development proposed.	
	21.4	3	Remove education zones from the Green Belt.	S	No change. Also see response to paragraph 21.5.	
	21.4	3	Refer to the development of land south of Berkhamsted providing a new	3	No change. The provision of a primary school does not	
			primary school.		justify the proposed housing development.	
			Oppose the location of a new primary school in the education zone to the north west of the town.		No change. See response to paragraph 21.5 below.	
	21.5	4	Take into account a review of the town's education system – more places		The Council has discussed the options with the County	
	21.0	-	and a possible change from the current three tier system to two tier		Council. The Core Strategy policy framework allows for the	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			(which exists in most of the county).		necessary investment in school infrastructure whatever the outcome of the review of the town's education system. It is important that the identified education zones in the Green Belt are retained, because there are no practical options for a new school within the town. Although two local schools could be expanded in situ, there are constraints and the County Council has indicated its first priority as a new 'primary school' to the north west of the town.	
			Explain the delivery of new school facilities more fully.		No change. The County Council has provided sufficient information to justify the statements in the Core Strategy. No further text is necessary. The actual delivery of new school places and its timing will evolve over the plan period: it will be shown in the Council's infrastructure delivery plan.	
			Provide more school places before the delivery of more housing, particularly SS1.		No change. The Council will be guided by the County Council on the timing of school facilities in relation to housing development. The provision of new school places will be necessary to support SS1.	
	21.6	2	Refer to archaeology being a potential constraint on the extent and/or design of development.		No change. Historic character is referred to here, and the detail requested is unnecessary. Section 17 and saved Local Plan policies more than adequately cover archaeological issues.	
			Retain the existing playing field at SS1.		No change. See response below. New space will be provided in accordance with the Council's planning policies, for example on lighting and ancillary building. Overall there will be more space publicly accessible.	
	21.7	3	Reverse the decision to remove land/school playing field from the Green Belt at SS1.		No change. There are no exceptional circumstances justifying the reinstatement of land removed from the Green Belt. The playing fields were identified as an appropriate location for housing through the previous Local Plan Inquiry.	
			Refer to public open space being increased.		No change. Paragraph 21.7 is accurate and appropriately expressed. It is however agreed that there will also be more space publicly accessible.	
			Identify development south of Berkhamsted as securing improvements to green infrastructure and around 24ha of publicly accessible open space.		No change. The addition of new open space does not justify the proposed development.	
	21.8	1	Should the last sentence, referring to protection of the historic character of the canal including wharfage, be more positively expressed?		No change. The intention is appropriately expressed.	
	21.9	3	Identify the former Royal Mail sorting office as a development opportunity (for commercial use and shoppers' car parking).		No change. This can be considered through the Site Allocations DPD and/or planning application.	
			Will the development of SS1 be detrimental to the town?		It is difficult to see why this would be detrimental to the functioning of the town centre. The effects would be relatively small – some additional traffic and trade, and possibly employment. No change to paragraph.	
			Identify a new local centre to be provided as part of the development of south Berkhamsted.	S	No change. It is not needed, because the Core Strategy does not propose housing development here.	
	21.10	1	Refer to increased employment opportunities in the town and on SS1		No change. Sections 11-13 consider employment matters, together with different aspects of the Berkhamsted Place	

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					Strategy. This provides sufficient detail. There will be some employment on the SS1 site – construction, maintenance and the school in particular.	
	21.12	1	Make further reference to Berkhamsted Castle.		Additional reference to this historical asset and its landscape setting can be made.	MC82 MC83
	21.13	4	Make parking at the stations cheaper.		No change. This is a matter for the operator that can be raised when considering the Urban Transport Plan.	
			Does the proposed development of SS1 contradict statements on sustainable travel?		No change. Objections to SS1 do not undermine the statement in paragraph 21.13.	
			How will sustainable travel options (including bus travel for SS1) be delivered?		No change. This is an important issue which is continually addressed by the County Council as local highway authority, and will be a matter for the Urban Transport Plan. What can be achieved in the short term will be different to the longer term. Modal shift (encouraging less car usage) will take time. Development sites will make financial contributions to sustainable transport measures and will also be designed to accommodate appropriate physical measures.	
			Refer to the potential provision of a new link road to the south of the town as part of a South Berkhamsted development.	S	No change. It is not needed, because the Core Strategy does not propose housing development here.	
	21.14	2	Complete the road link between Springfield Road and New Road: provision could be linked to low cost housing on Lock Field, with no vehicular crossing of the canal bridge.		No change. The Council has given full opportunity for the issues to be aired. It commissioned work through the County Council to help reach a conclusion on whether a road link should be provided. The potential development of Lock Field was considered both separately from this issue and together with it. The road link is not considered necessary by the highway authority in traffic terms nor needed to improve air quality in Northchurch High Street.	
Strategic Site SS1		16	Delete the strategic site if possible		No change. There are no exceptional circumstances justifying the reinstatement of land removed from the Green Belt. The school and playing fields were identified as an appropriate location for housing through the previous Local Plan Inquiry. This area has been accepted as an urban site.	
			Object to the strategic site: various general reasons are put forward - examples: - Brownfield sites within the town should be developed to a much higher density (to a minimum height of three storeys, with underground car parking). - The impact on the Green Belt and Bulbourne Valley - Consider 'alternative' sites at New Lodge and Hilltop Road - Impact on the character of the town - Environmental impact - Accessibility of site in relation to travel and proximity to the town centre and other facilities - Insufficient school places and availability of other infrastructure.		No change. See above response. Brownfield sites are used to the level that is compatible with the character of their location in the town: sites within the town form the majority of the housing supply. The use of some green field land is considered necessary to meet the local housing objective for Berkhamsted. Alternative locations have been appraised. None is free from issues. New Lodge is identified already as a housing proposal site in the Local Plan and is part of the committed housing supply. The more important need for Hilltop Road is education use. Design, layout and landscape strategy will mitigate the impact of development on site SS1. A substantial area of additional genuinely public space will be provided together with appropriate links through the site.	

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		examples: - Flood risk from run-off - Loss of public amenity space - There would be more car travel because of the location: cycling and walking into town would be inhibited because of the valley side slopes - There is no transport assessment and no site travel plan: plan to reduce car journeys - Effect of traffic on the town centre, including availability of parking - Effect of traffic on Shootersway and Kingshill Way/Kings Road - Maximum use of new open space will entail floodlighting and light pollution/impact Sewerage is inadequate - Water supply upgrade may be needed		run-off) and others through more detailed discussion with infrastructure providers at the planning application stage: also see response to infrastructure issues below. The effects on the town centre will be relatively small and probably balanced – some additional traffic and trade, and possibly employment. The approach to sustainable transport affects the site (and what it can reasonably contribute) and the rest of the town as well: the urban transport plan will address this matter across the whole town. An aim of this plan could be to secure more managed parking space in the town centre. Specific traffic impacts are being addressed. Minor amendments to some of the principles will help.	
		Should the proposal refer to 180 new homes – or from 100 upwards to around 180? Various reasons are put forward for a reduced figure. The issues raised above broadly apply. Consistency with the density of neighbouring housing is also referred to.		No change to the proposal. It is important that effective use is made of land within the urban area, commensurate with its location and surroundings. The context is different from the Local Plan in that more homes are needed over a longer time period. The Council has considered a figure up to 240/250 (Emerging Core Strategy) and in the light of consultation and further consideration has reduced it. An increase of 80 homes on the Local Plan is considered reasonable: more open space will be provided. Also see response to Figure 23 relating to urban design zones.	
		Should delivery of the site be delayed in order to let the infrastructure issues raised be resolved and new urban transport plan be completed? Amend principle 1 such that the 40% affordable housing requirement is		No change to SS1 delivery section. Infrastructure issues will continue to be discussed with the providers and landowners. No irresolvable issues are evident. The development will meet the requirements of the infrastructure providers. While the timescale of delivery of the housing is considered realistic, it is possible that timescales could slip as a result. The delivery of housing is not dependent on the urban transport plan. The highway authority is fully aware of SS1 and the earlier Local Plan proposal. No change. Policy CS18 covers the point for all housing	
		subject to viability. Should principle 4 on transport and highway works clear be the same as for LA4? (The transport principle with SS1 does not refer to the possible need to take land at LA4 in order to improve the Kingshill Way junction)		development proposals. The principle can be presented along similar lines to principle 4 in LA4. The junction design at Kingshill Way and need to contribute to other minor junction works will be agreed with the local highway authority. See also response to LA4.	MC84
		Should principle 4 be replaced with a criterion for there to be a net positive effect on the environment? (This would mean that average per capita greenhouse gas emissions should be reduced.)		No change. Existing principle 4, as amended (see above), is both necessary and appropriate. The new principle suggested is not capable of effective monitoring although the Council will be undertaking most of the assessment requested – firstly through sustainability appraisal on the Core Strategy and secondly through a sustainability	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
				statement and carbon compliance check in accordance with Policy CS29.	
		Should principle 8 be revised removing the generation of funds for school refurbishment?		Agree in part. Development should be planned to enable refurbishment of the school.	MC84
		Refer to the proximity and sensitivity of the Chilterns AONB.		No change. While landscape issues are relevant, the AONB is a significant distance away.	
		Refer to liaison with Sport England and safety of people crossing Durrants Lane.		Agree with points, which will be covered in the master plan. Hence no change to the principles.	
		Should 2.5 storey buildings be accepted?		No change to proposal. Some part of the site could accommodate an element of building at this scale without detriment. It is more appropriately covered in the master plan.	
		Amend delivery point 3: issues - delete "generating funds for the school" - deliver school playing fields alongside the first phase of housing.		This can be suitably rephrased.	MC85
Proposal LA4	6	Delete the local allocation: various reasons are put forward - examples: - Impact on the Green Belt - Impact on the valley landscape, views and habitats - Impact on local neighbourhoods.		No change. Local allocations are needed to meet the housing target. The location of the site and the scale of development will help to limit the impacts. Alternatives have been assessed and on balance this location is preferred.	
		Include The Old Orchard in the site description.		No change. A general description is most appropriate at this stage. A site will be delineated and more precisely defined through the Site Allocations DPD: the Council accepts The Old Orchard is a small area and can reasonably be included in the <i>definition</i> of the site then. The Council is currently discussing planning issues with the landowners concerned.	
		Increase the dwellings capacity to 65-75		No change. The dwellings capacity is approximate and can be more precisely defined in the light of further assessment and master planning connected with the Site Allocations DPD.	
		Is principle 4 on transport and highway works clear? Should it be the same as for SS1? (The transport principle with SS1 does not refer to the possible need to take land at LA4 in order to improve the Kingshill Way junction)		The principle can be presented better and along similar lines to principle 4 in SS1. The junction design at Kingshill Way will be agreed with the local highway authority. Specific reference to land take will be removed. It is not necessary on highway grounds for LA4 to be brought forward.	MC86
		Should principle 4 be replaced with a criterion for there to be a net positive effect on the environment? (This would mean that average per capita greenhouse gas emissions should be reduced.)	S	No change. Existing principle 4, as amended (see above), is both necessary and appropriate. The new principle suggested is not capable of effective monitoring although the Council will be undertaking most of the assessment requested – firstly through sustainability appraisal on the Core Strategy and secondly through a sustainability statement and carbon compliance check in accordance with Policy CS29.	
		Delete principle 5 – no access from Shootersway.		No change. This is the only logical access accepted in principle by the local highway authority.	
		Programme development to enable the Kingshill Way junction improvement to precede or accompany the development of SS1		No change. It is not necessary on highway grounds for LA4 to be brought forward.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
Vision Diagram (Fig 23)	6	Reclassify SS1 from semi-urban to peripheral urban design zone.		No change. Design zones should reflect what is proposed and not necessarily maintain the character of past development. Although the upper slopes are more sensitive in longer distance views, the lower land occupied by the school can more readily take higher building density. Detailed planning for the site will look more closely at this issue. The reduction of the dwelling capacity from 240/250 in the Emerging Core Strategy to 180 will help.	
		Show Berkhamsted Castle.		No change. This is unnecessary to what is effectively an urban design diagram.	
		Show the boundary of the Chilterns Area of Outstanding Natural Beauty Show a new local allocation for land south of Berkhamsted.	S	No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here. No change. The Core Strategy does not include this	
22. Tring	10	Plan infrastructure carefully: pressure from additional development affects the ability to obtain school places and doctors' appointments', adds to local congestion, pressure on class sizes and water supply and affects parking availability in the town centre.		proposal. No change. Linking infrastructure provision and development is a principle the Council supports. The level of development at Tring has been considered against infrastructure constraints. The modest level of change proposed is consistent with maintaining a stable population. The Council has been collaborating with infrastructure providers, including the education and highway authorities, the Primary Care Trust and water undertakers. While there are issues, particularly the capacity of Tring School, there are no overriding problems.	
		Give greater emphasis to provision for sporting facilities in Tring. This requires the following changes: - Refer to the town supporting a thriving sporting community (paragraph 22.2); - Refer to demand from the local community and schools for sports facilities being met (Vision); - Delete reference to playing fields at LA5 (paragraph 22.3 and LA5); - Insert new paragraphs seeking replacement of Tring Sports Centre and new playing fields.	S	It is important that sporting issues are fairly reflected both across Dacorum and at Tring. The Core Strategy includes the relevant strategic objective and policy (CS23). The vision for Tring is appropriately expressed. Some simplification of Tring Objective 2 will broaden its extent and cover open space. The reference to playing fields under LA5 should remain, although other space can be provided elsewhere. Dual use of any new education playing fields may be relevant. A new paragraph can better cover the Council's approach to Tring and give greater emphasis to the local sports community and its wishes.	MC1 MC88 MC89 MC90 MC91
		No housing in the Green Belt (or on greenfield sites).		No change. It would not be possible to accommodate the housing target without some greenfield land take.	
		Insert statement on archaeology – the potential presence of heritage assets and their protection		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. This is sufficient.	
Context: 22.1-2	-				14007
The Vision	2	Recognise the farming heritage of the countryside around Tring.		In this case a minor change would be appropriate and would take account of the issues and debate over new development at Tring. Much of the land is in the Chilterns	MC87

	Conserve (not retain) built and natural heritage, and refer to the proximity of the Chilterns Area of Outstanding Natural Beauty. 3 Qualify 3 rd objective relating to Tring School: make provision if required. Amend 5 th objective: increase the level of employment provision. Add objective: provide new/improved sports and leisure facilities. 12 Should the housing objective be reduced from 480:		AONB. Tring's agricultural heritage includes a farmers market, apple festival and former livestock market. No change. Proximity of the AONB is adequately covered in this section. Simplify objective. No change to Tring Local Objectives. As there is no general population growth proposed at Tring, it is considered that the	MC88
	of the Chilterns Area of Outstanding Natural Beauty. 3 Qualify 3 rd objective relating to Tring School: make provision if required. Amend 5 th objective: increase the level of employment provision. Add objective: provide new/improved sports and leisure facilities. 12 Should the housing objective be reduced from 480:		this section. Simplify objective. No change to Tring Local Objectives. As there is no general	MC88
	Amend 5 th objective: increase the level of employment provision. Add objective: provide new/improved sports and leisure facilities. 12 Should the housing objective be reduced from 480:		No change to Tring Local Objectives. As there is no general	MC88
Delivering the Vision: 22.3-9 22.3 12	Add objective: provide new/improved sports and leisure facilities. 12 Should the housing objective be reduced from 480:			
Delivering the Vision: 22.3-9 22.3 12	12 Should the housing objective be reduced from 480:		objective is appropriately framed.	
Delivering the Vision: 22.3-9 22.3 12	9 ,		Simplify 2 nd objective to refer to open space which is the key issue. The common local objectives otherwise apply.	MC88
	- In order to eliminate any development in the Green Belt (and therefore LA5); and - because services will not be able to cope? [Note - also see LA5. If the capacity of LA5 were increased, so presumably should the figure for the housing objective.] Should additional facilities be provided to cope with the new housing? Examples given:		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Tring. It has considered alternative levels against housing forecasts and the role of Tring in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of the town, its infrastructure and its surroundings. The impact on the Green Belt is relatively modest. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to maintaining the population level and is considered reasonable. Also see responses to LA5. No change. While some new infrastructure will be appropriate (e.g. more open space, school places and other	
	- another supermarket - extra school places - another doctors' surgery - increased leisure facilities for young people.		community facilities), this issue should be kept in proportion with the level of development proposed over 25 years. Retail studies show shopping floor space requirements in Tring to be low. See responses under paragraphs 22.4 and 22.9 for schooling and health respectively.	
	Is land at Dunsley Farm (north of London Road) a better alternative for development than LA5? Or suitable, if additional land is required?		No change. The character of Tring and its surroundings and the capacity of local infrastructure are sensitive to the level of development. Additional local allocations are not needed at Tring to meet the Core Strategy housing target or local housing objective. Alternatives to LA5 have been assessed, considered and subject to consultation. On balance the Council prefers LA5.	
	Is land north of Station Road a better alternative for development than LA5?	S	No. Alternatives to LA5 have been assessed, considered and subject to consultation. On balance the Council prefers LA5.	
	Is the delivery of new housing sufficiently explained?		No change. The Core Strategy contains sufficient explanation. Evidence is presented in other documents – particularly those on housing land availability.	
	Refer to the maintenance of viable farming around the town.		Agree - amend paragraph 22.5 appropriately. Also see	MC92

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			conserved and enhanced, with no housing or employment development proposed in the AONB as part of LA5, and in general locate development so that it has minimal impact on the AONB.		embraced by the Core Strategy. There is no intention or proposal to build in the AONB west of Tring through the local allocation. Some development will inevitable occur at places within the AONB and will be visible from the AONB (even if located outside). Where development is necessary, the Council will follow the principles in Policy CS24, and consider the layout and design very carefully, e.g. using the Chilterns Buildings Design Guide.	
	22.4	6	Does the paragraph wording adequately reflect the County Council's approach to education?		The Core Strategy has resulted from careful liaison with the County Council. Minor changes can better reflect the overall approach to open space and flexibility needed for education planning at Tring. The Council agrees with HCC that contributions to education infrastructure will be secured through all appropriate development schemes, including LA5.	MC1 MC90
			Will the level of housing proposed cause problems for school capacity and provision?		The level of housing development and its timing are important matters for school infrastructure. The level of housing proposed for Tring reflects discussions with the County Council as a service provider. Local allocations are intended for development later in the plan period in order to help ensure that existing infrastructure can adapt and provide the necessary capacity. Policy CS35 supports the close linking of infrastructure provision with new development: in some cases it may be necessary to delay development. The more significant issue is for Tring School: however, there is no intention that Tring children should be expected to travel to Berkhamsted to school. Also see response above.	
			Will the provision of detached playing fields be a workable policy for Tring School?		Yes. This is proposed by the County Council as and when necessary. Any detached playing fields would add to space retained for this purpose on the existing site. The School should be able to plan the use of detached playing fields to suit its curriculum demands and timetabling.	
			Should a new primary school be provided?		No change. Liaison with the County Council suggests extra places, but no need for a new school at the scale and timing of development proposed in the Core Strategy.	
	22.8	1	Remove traffic from and 'traffic calm' Miswell Lane.		No change. Access to and from the local allocation will the subject of further consideration, although the local highway authority has advised there are no particular problems. All appropriate development (including LA5) will contribute towards sustainable transport measures. The urban transport plan for Tring can address any relevant concerns about Miswell Lane.	
	22.9	1	Provide new health care facilities (or relocate LA5 to where there is spare capacity).		No change. Additional or different infrastructure can be provided by the usual agencies. However, there is understood to be sufficient capacity for doctors at Tring, and so no particular need.	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Proposal LA5	18	Should the local allocation be deleted, because, for example, of the		No change. The local allocation is needed to meet the local housing objective and housing target in the Core Strategy. The scale of development is reasonable for the size of the town: it will be limited in extent and therefore help to maintain the compactness of the town. Alternatives to LA5 have been assessed, considered and subject to consultation. On balance the Council prefers LA5. The scale, design and layout of development coupled with a landscape strategy will help the extension blend in with the town and its landscape setting: the built area will not be within the AONB. The Council has been collaborating with infrastructure providers, including the education and highway authorities, the Primary Care Trust and water undertakers. While there are issues, there are no overriding problems.	
		Should the local allocation be deleted for other more detailed reasons? Examples: - dangerous/difficult access and effect of traffic on Miswell Lane - impact on wildlife - impact on footpath across area - loss of green area - visual and landscape character impact on areas outside Dacorum - effect on school capacity.		No change. More detailed consideration of the site through the Site Allocations DPD will address all these matters. All are capable of mitigation or resolution. See response above also.	
		Should the dwellings capacity be reduced, increased or retained? Should the dwellings density be set at 30-40 dwellings per hectare?	S	No change. The ultimate capacity of the potential built area may be greater than 150 new homes <i>plus</i> employment land, cemetery extension, play space and other facilities. It is also accepted that an effective use of land should be achieved. This will entail further consideration of height of buildings and density together with sensitive landscape design and assimilation into the landscape. Timing of development will be particularly important in terms of school infrastructure capacity. The dwellings capacity of LA5 is set at what is reasonable for the plan period. The Council wants to collaborate on more detailed investigations with the landowners: this may affect current conclusions. A dwellings density of 30-40 dwellings across the built area would be insensitive.	
		Should employment land be retained as part of the proposal?		Yes. This will allow for relocation out of the town into more suitable premises as well as opportunities for new business. It was recommended through the Employment Space Study. Employment provision should be available in the long term.	
		Refer to potential provision of detached playing fields in principle 2.		The contribution to education facilities can include both buildings and space: both are probably required.	MC93
		Refer to a more natural transition from the town to the AONB in principle 4.		Building is not proposed within the AONB. The Site Allocations DPD will define a defensible Green Belt boundary. A soft edge and transition from built area to AONB is intended.	MC93

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			be agreed by Dacorum, Aylesbury Vale and Buckinghamshire Councils before the Site Allocations DPD.		raised in connection with visual impact on the 'Wendover Foothills' and traffic on the A41/B488 and B4089 junction While the Council will talk through these issues with the other Councils mentioned, and indeed other relevant organisations (such as the local highway authority, Herts County Council), the principle suggested is both inappropriate and unnecessary for the Core Strategy. It is a matter of detailed process.	
			Should development start and/or be limited to the field adjoining Aylesbury Road?		No change. Site access and visual impact (relating to a future landscape strategy) should be considered further in the Site Allocations DPD.	
Vision Diagram (Fig 24)		3	Show the boundary of the Chilterns Area of Outstanding Natural Beauty		No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
			Should an alternative or additional local allocation at Dunsley Farm be shown?		No change. The character of Tring and its surroundings and the capacity of local infrastructure are sensitive to the level of development. Additional local allocations are not needed at Tring to meet the Core Strategy housing target or local housing objective. Alternatives to LA5 have been assessed, considered and subject to consultation. On balance the Council prefers LA5.	
23. Kings Langley		2	Refer to the potential need for a transport assessment with development in the village, because of the possible impact of traffic on Junction 20 of the M25.		No change to Kings Markyate Place Strategy. Development at Kings Langley in Dacorum is highly constrained and will mostly be small scale. Further reference under this Place Strategy is unnecessary. However, a change to Section 9 will cover the issue of transport assessments more generally and apply to all development sites as relevant.	MC17
			Indicate the infrastructure that will accompany new development in Kings Langley.		No change. The Core Strategy states what is known. An Infrastructure Delivery Plan has been published and will be updated: it may include more information about Kings Langley.	
Context: 23.1		-				
The Vision Local Objectives		1 2	Refer to the farming heritage. Amend objective 2 to refer to: - sport and leisure provision at Kings Langley School - primary school facilities.		No change. The vision is appropriately expressed. No change. The objective addresses the key issue for the village. The provision of a primary school in Hemel Hempstead which could affect the catchment of Kings Langley Primary School is covered in the Hemel Place Strategy. Policy CS23 addresses education and explains the Council's approach. This allows for new facilities at the primary school. It also encourages dual use of sports facilities at (senior) schools. Guidance on the 'Major Developed Area' at the secondary school will reassessed through the Site Allocations DPD.	
Delivering the Vision: 23.2-6	23.3	1	Insert statement on archaeology – scheduled sites, the potential for finds and protection of heritage assets.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. This is	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				sufficient.	
Vision Diagram (Fig 25) 24. Bovingdon	2	The level of housing provision is low and does not accommodate the needs of neighbouring rural communities.		No change. The Council has taken a number of factors into consideration in reaching a balanced conclusion on the level of new housing for Bovingdon. It has considered alternative levels against housing forecasts and the role of Bovingdon and other places in the settlement hierarchy in Dacorum. It has also considered the impact of development on the character of the village, its constrained infrastructure and its surroundings. The impact on the Green Belt is relatively modest. The Council has assessed various sites and opportunities over the plan period, and has taken account of consultation. Ultimately the amount of development selected approximates to maintaining population level and is considered reasonable.	
		Are alternative sites to Chesham Road (LA6) preferable – land at Duck Hall Farm or Grange Farm?		No change. LA6 is modest in size and appropriate to the size of the village. The site is well contained within the Green Belt and reasonably accessible to the local centre. Alternatives have been assessed and this location is preferred.	
Context: 24.1	-				
The Vision	-				
Local Objectives	5	The level of housing proposed is too high: - it will exacerbate a problem of overcapacity at the primary school; - It will add to traffic and parking issues within the village; - there are insufficient employment opportunities locally (in relation to new housing).		No change. Local allocations are needed to meet the housing target. This local allocation is modest in size and appropriate to the size of the village. It will enable the housing objective for Bovingdon to be met. Potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s): these matters will be subject to consultation. Timing of development will be relevant to infrastructure capacity, particularly the primary school. The Council is liaising with the County Council on infrastructure delivery. The level of housing is not expected to cause any significant population change. Important employment uses will be safeguarded. They will provide employment opportunities locally, although it is acknowledged that people inevitably travel because that gives greater choice.	
		How will local allocation, LA6, encourage sustainable transport?		No change. The issue is common to any development site. All sites will be asked to contribute to sustainable transport measures through financial contribution and through site layout and design (e.g. by location of direct footpath routes). The County Council, as local highway authority, will consider what measures can and should be taken in respect of the local highway.	
		Provide new open space, but not necessarily as part of LA6: concerns listed - The site runs parallel with a green/biodiversity corridor which is an integral key part of the wildlife corridor.		There is no loss of public open space, only a potential gain. The wildlife corridor will be accommodated in the development layout. The reference to the provision of some open space on local allocation, LA6, is appropriate. A minor	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
			Loss of local amenity/ recreation space and need to reflect the Green Space Strategy. LA6 is too small to accommodate all proposed uses.		change to the objective will clarify that local allocation LA6 need not be the only location for future open space. No change. The local allocation is appropriate for the uses identified.	
Delivering the Vision: 24.2-5	24.2	4	Object to local allocation, LA6, because of open space impacts: a) Open space - The site runs parallel with a green/biodiversity corridor which is an integral key part of the wildlife corridor. - Loss of local amenity/ recreation space and need to reflect the Green Space Strategy. - Use the site for open space and/or allotments. b) Land at Duck Hall Farm would be more suitable for housing development on grounds of Green Belt and supporting biodiversity.		No change. There is no loss of public open space, only a potential gain. The wildlife corridor will be accommodated in the development layout. The Council will rely on the Urban Nature Conservation Study and supplementary advice from the Herts Biological Records Centre. A minor change to the objective will clarify that local allocation LA6 need not be the only location for future open space. LA6 was never intended to accommodate allotments: open space and allotments are appropriate Green Belt uses. Various alternatives for the local allocation have been assessed and LA6 is preferred. LA6 is well contained within the Green Belt and reasonably accessible to the local centre. It was part of Bovingdon Airfield and was originally intended as a second phase of housing for prison officers.	
			Object to local allocation, LA6, because of increased parking and traffic problems within the village		No change. Potential parking and traffic issues affecting the site will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). All these matters will be subject to consultation. For other parking and traffic issues, see responses under paragraph 24.5.	
			LA6 is of insufficient size to accommodate the proposed uses. It is unsuitable to accommodate a residential care home.		Various alternatives have been assessed and this location is preferred. The site has is considered to be of sufficient size to accommodate the uses identified. This does not include a residential care home, though the use would be appropriate to a residential area. A minor change to the local objectives will help to clarify that the Council will consider the location of a care home (if needed).	
			Development of LA6 would exacerbate water runoff and increase flood risk.		No change. Flood risk and drainage infrastructure will be examined further in the context of master planning for the site and the Site Allocations DPD.	
	24.3	2	Development on the Chesham Road will "extend" the village and give the appearance of sprawl. New housing on this site will be out of character with area.		No change. Local allocations, such as the site at Chesham Road, are needed to meet the housing target. This local allocation is modest in size and appropriate to the size of the village. It will enable the housing objective for Bovingdon to be met. The design of development should follow design policies in the Urban Design Assessment for Bovingdon and will not be out of character.	
			Refer to the potential for heritage assets of archaeological interest from the Roman and Medieval periods.		No change. Any heritage assets of archaeological interest will be investigated and any development impacts mitigated through Policy CS27 and saved Local Plan policy. Specific issues will be considered as appropriate in the Site Allocations DPD and relevant planning applications.	
	24.4	3	The development of LA6 is not an effective way of maintaining the village		No change. The paragraph is concerned with the role of the	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
			centre, particularly with the proposed building of a new Tesco store.		local centre, taking account of the new store opening. This affects the whole of the village and is not simply linked to one housing proposal.	
			Bovingdon Brickworks and The Mount Prison do not rely on the local population to fill vacancies.		No change. They provide employment opportunities locally.	
	24.5	4	New housing will add to traffic and parking issues within the village		No change. Bovingdon is a compact village and central facilities are reasonably accessible. The level of development proposed is relatively low so the level of any extra demand will be low. There are issues affecting the village centre, and no agreement on how to tackle them. The Council has concluded from consultation that village centre parking has a calming effect on traffic and that low key sustainable transport measures are generally felt to be the best way forward. Also see response below.	
			There is no evidence of ways to encourage sustainable transport in the Core Strategy, particularly relating to cycling and cycling spaces. Pedestrian infrastructure needs to be improved.		No change. All development sites will be asked to contribute to sustainable transport measures through financial contribution and through site layout and design (e.g. by location of direct footpath routes). The County Council, as local highway authority, will consider what measures can and should be taken in respect of the local highway. Their transport policies will apply to the whole of the area.	
Proposal LA6		7	Delete LA6 as a matter of principle:		No change. Local allocations are needed to meet the housing target. This local allocation is modest in size and appropriate to the size of the village. It will enable the housing objective for Bovingdon to be met. Further consideration will be given to the provision of allotments (ref paragraph 24.2).	
			Delete LA6 for detailed reasons given when commenting on the text of the Place Strategy: examples - effect on the character of the village - dwelling capacity is too high - effect on wildlife - loss of public open space - strain on the primary school - strain on the High Street from extra traffic and parking on the High Street.		No change. There is no loss of public open space, only a potential gain. Other matters listed and other potential impacts will be assessed and mitigated as the proposal is taken forward through the Site Allocations DPD and planning application(s). All these matters will be subject to consultation. The design and layout of the site will help to limit the impacts. Timing of development will be relevant to infrastructure capacity, particularly the primary school.	
			Delete LA6 in favour of an alternative: alternatives suggested include - Land at Duck Hall Farm - Land at Grange Farm (LA6 is less accessible, more constrained, of doubtful viability and should be accorded lower priority than the alternatives. The alternatives can also accommodate more development/uses.)		No change. Various alternatives have been assessed and this location is preferred. The site is well contained within the Green Belt and reasonably accessible to the local centre. It was part of Bovingdon Airfield and was originally intended as a second phase of housing for prison officers. The Council and landowners consider the site is deliverable. LA6 was never intended to accommodate allotments and a residential care home (if needed), as well as housing. Open space and allotments are appropriate Green Belt uses. A residential care home will be considered as a possibility through the Site Allocations DPD.	

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment
			Add a principle to address the drainage issue.		No change to the principles at this stage. The issue will be examined further in the context of master planning for the site and the Site Allocations DPD.	
Vision Diagram (Fig 26)		-				
25. Markyate		2	Refer to the potential need for a transport assessment with development in the village, because of the possible impact of traffic on the A5.		No change to Markyate Place Strategy. Development at Markyate is highly constrained and will mostly be small scale. The exceptions, Manor Farm in the Local Plan and SS1, are specifically covered. Further reference under this Place Strategy is unnecessary. However, a change to Section 9 will cover the issue of transport assessments more generally and apply to all development sites as relevant.	MC17
			Insert statement on archaeology – Watling Street, the potential for finds and protection of heritage assets.		No change. Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. This is sufficient.	
Context: 25.1-4		-				
The Vision		2	Should the reference to the village setting be elaborated, referring to farmland and the Chilterns Ares of outstanding Natural Beauty?		No change. The vision is appropriately expressed, and the AONB is mentioned in paragraph 25.2.	
Local Objectives		1	Insert new objective: provide new sport and leisure facilities.		No change. The principle is appropriately covered through the strategic objective, common local objectives and Policy CS23. No further detail is necessary.	
Delivering the Vision: 25.5-10	25.8	1	Refer to the Chilterns AONB as part of the setting.		No change. The AONB is mentioned in paragraph 25.2 and repetition is unnecessary.	
Strategic Site SS2	-	3	Should the reference to the retention of existing business tenants in principle 3 be deleted or strengthened?		No change. The reference is fair and appropriate.	
			Add 3 storey houses to principle 5.		No change. The current principle is the appropriate test. While it may be appropriate through high quality design to include an element of 3 storeys, this must be justified through planning applications.	
			Refer to the AONB around Markyate in principle 9.		No change. The AONB is mentioned in paragraph 25.2 and repetition is unnecessary.	
			Deculvert (part of) the River Ver (the extent to be agreed with the Environment Agency.)		No change. The principle is the appropriate test.	
			Delete reference to a planning performance agreement (delivery point 3).		Agree.	MC95
			Refer to a sequential test having been agreed (delivery point 8).		The criterion can be simplified. It is not necessary to refer to the sequential test.	MC95
Vision Diagram (Fig 27)		2	Extend the centre zone into SS1 to include the central focus		Agree.	MC96
			Show the boundary of the Chilterns AONB.		No change. The boundary is on the key diagram – the strategy for the whole district. It is not appropriate here.	
26. Countryside		2	Insert statement on archaeology – the potential for finds, the existence of known areas of importance and the importance of protection, even from certain agricultural practices.	S	Policy CS27 and Section 17 cover heritage assets, the historic environment and archaeology across the borough. The Local Plan also contains relevant saved policies which will be reviewed and updated. Normally all these references are sufficient. However, the countryside is an extensive area and some reference to archaeological heritage, its protection	MC98

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
					and land management is on balance reasonable.	
			Extend Wilstone village westwards to include a potential housing site.	S	No change. The village boundary and potential housing site are matters for the Site Allocations DPD to consider.	
Context: 26.1-3		-				
The Vision		-				
Local Objectives		1	Extend objective 5 to evaluate equine activities and their needs and balance their impact on the landscape.		No change to objective, which is appropriately phrased in the context of local issues. However, improving the bridleway network is an important intention and can usefully be mentioned in paragraph 26.15	MC99
Delivering the Vision: 26.4-18	26.11	1	Insert policy statement supporting recreational mooring basins and laybys.	S	The Council does not support new mooring basins/lay-bys in open countryside nor has evidence of need for them. Local Plan policies are saved and remain relevant. A minor change to the paragraph will suffice.	MC97
	26.18	1	Include further reference/measures on reducing light pollution.		Insert new text.	MC100
Table 12		1	Add Dip Slope to Plateau/Ridge landscape type.		No change. The reference from the Chilterns Buildings Design Guide in the Core Strategy is correct.	
Vision Diagram (Fig 28)		1	Add Shrubhill Common and Millhoppers nature reserves.		Add the missing countryside nature reserve – Millhoppers. (Shrubhill Common is covered by Figure 20).	MC101

Table 2a: Main Issues raised - Parts C and D and Proposals Map (Main Consultation)

Core Strategy Reference		Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
Part C – Implementation and Delivery	,	-				
Strategic Objectives		-				
27. Delivery		-				
Text: 27.1-4		-				
Partnership Working: 27.5-8		-				
Key Projects: 27.9-10		-				
Flexibility & contingency: 27.11-14		-				
28. Infrastructure		-				
Text: 28.1-2		-				
Infrastructure requirements: 28.3-6	28.3	1	Will aspirations to maintain water flows in the chalk streams be realised?		This is the aim. It has been agreed with the water utilities and advisers. The concerns of low flow are acknowledged and will be addressed as far as possible over the plan period. See also responses to paragraphs 18.29 and 18.34.	
Douglanay contributions, 20.7.11	28.5	1	Does the Core Strategy ignore the abstraction of water from the aquifer as a barrier to development?		No. Water supply is an important issue being addressed with the water utilities/advisers. The responsibility for supply and new sources of supply rests with Veolia. Other measures affecting the water environment can help – for example water efficiencies in new development, reduction of leakage and retention of rainfall within the local, natural environment. It is therefore important that the Council continues to work closely with the water utilities and advisers with the aim of restoring water levels and flows in the natural environment.	
Developer contributions: 28.7-11		-		_		
Policy CS35		5	Should the Core Strategy include detailed, costed infrastructure requirements?	S	Linking infrastructure provision and development is a principle the Council supports, and Policy CS35 sets the overall approach, not the detail. Providing costed infrastructure requirements is the role of a separate Infrastructure Delivery Plan: it has been prepared and is being updated in conjunction with infrastructure providers. The IDP will also be updated regularly in the future. Infrastructure will be delivered at various times over the plan period, and information will be refined and detail added over time.	
			Does the policy impose unreasonable financial burdens on development?		No. The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The CIL charging schedule will be subject to specific Examination (like the Core Strategy). The Council will approach the issue of charging on a reasonable basis and avoid setting charges at a rate which hinders or prevents development. Charging will be related to needs.	
			Should smaller housing projects be exempt from contributing to infrastructure?	S	No, not as a matter of general principle. All development contributes to infrastructure needs cumulatively. The Council	

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment reference
				must accord with regulations and advice, and will take viability fully into account. This may well mean that charges for smaller developments will be proportionately less.	
		Require a delivery timeframe for infrastructure before development can commence.	S	No change. This is a matter for the Infrastructure Delivery Plan. The policy will not allow critical infrastructure capacity limits to be breached. The Council will be guided by the relevant infrastructure provider about capacity limits. Infrastructure providers have responsibilities to provide the necessary infrastructure, but timing and funding of investment can be crucial, and a development could be delayed.	
		Relate the need for developer contributions (to infrastructure) to direct impact mitigation.		No change. Broadly this will happen. The setting of charges - for affordable housing contributions, community infrastructure levy and/or any other contribution – is guided by Government advice. All charges will be set in subordinate documents. The CIL charging schedule will be subject to specific Examination (like the Core Strategy).	
		Qualify the policy so that it is: - subject to viability and deliverability, and independent verification; - justified against Government policy; and takes into account other exceptional costs.		No change. The policy is appropriately framed and deals with the provision of infrastructure in relation to development. Also see above response.	
		Require further discussion with relevant stakeholders, e.g. Highways Agency, to ensure that infrastructure capacity and timing of development is related.		No change. This will happen in discussions on the IDP, other planning documents and development proposals.	
Monitoring/Delivery	-				
29. Monitoring	-				
Text	-				
Part D - Appendices	-				
Superseded Policies	_				
2. Housing Trajectory	2	Is the housing trajectory overoptimistic and therefore inadequate?		No change. A Strategic Housing Land Availability Assessment has been agreed with developer interests, and housing land availability information emanating from that assessment is updated annually. Policy CS17 states the housing target, for which there is sufficient land available and opportunity to meet it. The Council acknowledges there will be fluctuations in short term demand and supply, but Policy CS17 is sufficiently robust to deal with this.	
3. Delivery Mechanisms	1	Should reference be made to a Dacorum Local Food Initiative?		No change. The Dacorum Local Food Initiative is not an existing delivery mechanism. Even if it was, adequate reference is made to local food production elsewhere in the Core Strategy (including a minor change to the Borough Vision).	
4. Glossary	1	Evidence Base - should the definition include reference to information		No change. The evidence base is that used by the Council.	
		provided by organisations other than the Council?		Information has been drawn fro ma variety of sources.	
		Include a definition of Sites of Special Scientific Interest.		Agree.	MC105

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment
		Wildlife Site – remove FWAG from the list of organisations in the Wildlife Sites Partnership in Hertfordshire.		Agree.	MC107
Proposals Map	-				
General (including omissions)	-				
SS1: Shootersway	-				
SS2: Hicks Road	-				
Hemel Hempstead Town Centre	-				
East Hemel Hempstead Area Action Plan	-				
Conservation Areas	-				
Trunk Roads	-				

Table 2b: Main Issues raised – Proposals Map (Omissions Consultation)

Core Strategy Reference	Number of Objections	Issue	Nature of the Issue	Response	Amendment Reference
Proposals Map	1	The omission of changes delineating the future extent of the local allocations (and Green Belt boundaries).	m	No change. The boundaries of the local allocations will be determined through the Site Allocations DPD and necessary changes to the Proposals Map made at that time.	
East Hemel Hempstead Area Action Plan	1	The need for a clear eastern boundary for the AAP.	m	No change. The Core Strategy can only define boundaries within Dacorum's administrative area. Figure 22 shows an indicative boundary on the eastern edge. The text makes clear that the boundary of the AAP within St Albans has yet to be defined and will be subject to consideration through that Council's Core Strategy. Also see responses to main consultation, paragraph 20.17 and Figure 20.	
		The need for the Crown Estate, as major landowners within the wider		No change to the map. However the Crown Estate will be a key consultee on future work relating to the AAP.	
Hemel Hempstead town centre	2	area, to be involved in future joint working. The need to recognise areas of wildlife interest and amenity value at Paradise Fields within the boundary.	S	Agree. The presence of open land and key wildlife areas should be reflected in any redevelopment proposals. The town centre boundary on the Proposals Map and Figures 19-21 will exclude Paradise Fields (which will largely be open land). Suitable reference will also be made to Paradise Fields in Figure 17.	MC78 MC79 MC80 MC108
		Does the inclusion of the Hospital Zone undermine the aim to focus retail and town centre development/regeneration in the Old Town, Gade and Marlowes Zones?		No change. The eastern extension of the town centre to include the built area of the hospital and Paradise General Employment Area is an important part of the Council's regeneration strategy. The town centre boundary on the Proposals Map will exclude Paradise Fields (see above response). Figure 17 makes clear that not all land within the town centre is intended to be used for retail purposes. The focus for future regeneration opportunities in the hospital zone (which extends beyond the town centre boundary and includes Paradise Fields) are predominantly residential, education, health and business uses, and open space.	
		Exclude the Hospital Zone and Paradise Fields from the town centre.	S	The eastern extension of the town centre to include the built area of the hospital and Paradise General Employment Area is an important part of the Council's regeneration strategy. The use of Paradise Fields (primarily as open land) will contribute to regeneration, but it can more appropriately be excluded from the designated town centre.	MC79 MC80 MC108
Conservation Areas	-			la l	
Bovingdon	-				
Chipperfield Frithsden Great Gaddesden	- 1	The need for further extensions to include:		No change. The Conservation Area has recently been subject to detailed review. Potential extensions to include these new areas were considered as part of this review, but excluded for the reasons set out in the Consultation Report that accompanies the Conservation Area Appraisal.	

Number of Objections	Issue	Nature of the Issue senogen	Amendment Reference
Nettleden -			

Table 3: List of Proposed Amendments to the Core Strategy

Notes

1. Nature of the Amendment

MC	Minor Change	From Table 2
E	Editorial Change	
SC	Significant change	None

- 2. All editorial changes are minor changes in nature. Editorial changes are intended to clarify meaning, update facts and correct any inaccuracies. Some editorial changes follow minor changes arising from the representations.
- 3. Further amendments will be necessary as a consequence of some of the amendments listed: e.g. Strategic Objective 13 will be amended every time it appears; the insertion of a new paragraph will require the number of each succeeding paragraph in the section to be changed; including a new delivery action (e.g. following Policies CS24-CS26) will require inclusion in Appendix 3: Delivery Mechanisms for the Vision and Strategic Objectives.
- 4. Amendments to maps and diagrams are recorded in the main part of Table 2. The amendments are illustrated after the Table.

Main Table

Core Strategy Reference	Amendment Reference	Amendment
	Reference	
1. Summary of the Strategy		
Text	E1	1.4 An average of 430 new homes will be provided within the Borough each year, for the plan period (2006-2031). This equates to a total of
		10,750 homes. The actual level of delivery is expected to be slightly higher, if 'windfall' sites are taken into account for the whole plan period
		(see Table 7). due to Government rules which do not allow assumptions to be made for 'windfall' sites for the whole plan period when setting
		the housing target.
	E2	1.10 Hemel Hempstead will be the Main Centre for Development and Change in the borough and the focus for new homes, jobs and
		infrastructure. This will include:
		• New homes. Around 8,800 new homes will be provided in the town. This includes Local Allocations at West Hemel Hempstead,
		Marchmont Farm and the Old Town. 35% of all new homes will normally be made available at affordable prices or rents.
		• New jobs. A significant proportion of anticipated new employment floorspace will be delivered in the town over the lifetime of this
		strategy. The Maylands Business Park will be the focus for this growth.
		 New services and facilities. New leisure and cultural facilities a performing arts venue and cemetery will be provided. Hertfordshire
		County Council have has also advised that six new primary schools will be needed to serve both the new and existing population of
		the town.
		the town.
		New infrastructure. Public transport links between Maylands Business Park, the town centre and Hemel Hempstead railway station
		will be improved.
	MC1	1.13 A 'second tier' of market towns will meet their local housing needs and provide employment and services for local and adjacent
		communities.

Core Strategy Reference	Amendment Reference	Amendment
		a) Berkhamsted – will have around 1,180 new homes. This includes a local allocation at Hanburys, Shootersway and the strategic site at Durrants Lane/Shootersway (Egerton Rothesay School), which will provide new homes, improvement to the school and additional playing pitches. Two 'education zones' have also been identified on the edge of the town to ensure the future primary age schooling needs are met. Existing employment land will be retained.
		b) Tring – will have around 480 new homes. This includes a local allocation at West Tring to provide new homes, an extension to the Icknield Way General Employment Area, playing fields and new open space. The capacity An extension of Tring School will be accommodated. increased and new detached playing fields can be provided.
Key Diagram	E3	See Figure. Show extent of rural area designation.
Part A - Context		
2. Introduction		
Text	-	
Figures 1 & 2	E4	See Figure. Update Figure 2 to indicate Submission stage now reached.
3. Borough Portrait		
Text	E5	3.4 Its location on the south western edge of Hertfordshire means that the area has strong links with the adjoining counties of Buckinghamshire and Bedfordshire. Significant growth is planned expected for Luton, whilst many smaller nearby towns, such as Amersham and Chesham, will experience relatively little change.
	MC2	3.22 The borough's landscape ranges from the rolling hills, beech woods and chalk streams that characterise the Chilterns, to the lower, flatter landscape of Boarscroft Vale. It is home to It contains numerous sites of wildlife interest and some a number of rare species, including the black poplar and water voles and White-Clawed Crayfish. Dacorum also has a rich and varied historic heritage, from the distinctive New Town architecture to more traditional brick and flint buildings of the market towns. The Grand Union canal runs north to south, formerly providing the power for the paper mills that once dominated the Gade Valley. The borough is home to 25 Conservation Areas, 4 Registered Parks and Gardens, some 2,000 Listed Buildings, around 30 Scheduled Ancient Monuments and many known archaeological sites.
Figures 3 - 6	-	
4. Challenges		
Challenge 1	-	
Challenge 2	-	
Challenge 3	-	
Challenge 4	-	
Challenge 5	MC3	The combined effects of climate change, and population growth and development pressures will increase pressures on the natural environment. These impacts must be reduced through the prudent use of natural resources, encouraging renewable energy production, the effective disposal of waste, the sustainable design of new development and careful land management.
Challenge 6	MC4	Development must celebrate and reinforce local distinctiveness - reinforcing the good qualities and reducing or removing the bad. It must recognise that what is appropriate in one location cannot necessarily be replicated elsewhere, in order to retain the individual identities of each place. Development must also help to mitigate and adapt to against the impacts of climate change, through sustainable design and construction and reducing the need to travel, particularly by car.
5. Borough Vision		
Text	-	
Vision	MC5	Second paragraph: The natural beauty of the Chiltern Hills and the varied character of the countryside is admired and cherished. The countryside is actively managed and supports a healthy local economy and diversity of wildlife. More food is grown locally. Water quality in the rivers is good. Towns and villages have sufficient water supply. Carbon emissions have been reduced and renewable energy production is sensitive to its surroundings. New woodlands have been planted for the future and the borough looks much greener. Effective use has been made of developed land in the towns and villages, protecting the countryside

Core Strategy Reference	Amendment Reference	Amendment
6. Strategic Objectives		
Text	-	
Objective 1	-	
Objective 2	-	
Objective 3	-	
Objective 4	-	
Objective 5	-	
Objective 6	-	
Objective 7	-	
Objective 8	-	
Objective 9	-	
Objective 10	-	
Objective 11	-	
Objective 12	-	
Objective 13	MC6	To promote the use of renewable resources, reduce carbon emissions, protect natural resources and reduce waste.
Objective 14	-	
Objective 15	-	
Objective 16	-	
Objective 17	-	
7. Other Plans		
	E7	being addressed in varying degrees by a range of other strategies and policies at national, county and local levels. It is therefore important that the Core Strategy, and other Development Plan Documents, complement and reinforce these. Figure 7 lists some of these key documents and strategies. 7.2 'Towards 2021- The Dacorum Sustainable Community Strategy', sets out the community's aspirations for Dacorum. It was produced by the Dacorum Partnership, formerly the area's Local Strategic Partnership, (LSP). This group represents the borough and County Councils and delivery partners such as local healthcare providers, the police, community groups and voluntary organisations operating within Dacorum. The Local Planning Framework is a key delivery mechanism for the wider Sustainable Community Strategy (SCS). Its objectives must therefore link with, reinforce and elaborate upon those drawn up for the SCS (Figure 8). Since publishing the SCS the Dacorum
		Partnership has been replaced by a smaller partnership, 'Destination Dacorum,' who will lead the SCS review.
Figure 7	MC7	 Planning policy statements and guidance National Planning Policy Framework (NPPF) Planning Circulars County or Sub-region East of England Plan¹⁰ Hertfordshire 2021 A Brighter Future Hertfordshire's Economic Development Strategy 2009-2021 Local Economic Assessment (LEA) Local Transport Plan (LTP) Biodiversity Action Plan (BAP) Green Infrastructure in Hertfordshire – a Framework Minerals and Waste Development Framework for Hertfordshire
I		Management Plan for the Chilterns Area of Outstanding Natural Beauty
		• Wanaschieft Flait for the Chiteris Area of Outstanding Natural Deauty

Core Strategy Reference	Amendment Reference	Amendment
		Documents and strategies produced by the Local Enterprise partnership (LEP)
		Local
		 Towards 2021- The Dacorum Sustainable Community Strategy Corporate Plan Housing Strategies Green Space Strategy Dacorum's Economic Development Strategy Dacorum Development Programme Maylands Masterplan Local Biodiversity Action Plan
Figure 8	MC8	First part of Figure
Don't D. The Ofrican		Community Strategy Objective Reducing crime and creating a safer Dacorum To promote healthy and sustainable communities and a high quality of life To create safe and attractive environments through high quality design To create safe and attractive environments through high quality design Principal Core Strategy Policies CS10 CS11 CS12 CS12 CS13 CS23 CS23 CS29 CS30
Part B – The Strategy The Sustainable Development Strategy		
Strategic Objectives	-	
8. Promoting sustainable development		
Text: 8.1-6	-	
Figures 9 & 10	-	
Distribution of Development: 8.7-12	-	
Table 1	MC9	Policy CC1. Distribution of Davidson and
Policy CS1	IVICS	Policy CS1: Distribution of Development Decisions on the scale and location of development will be made in accordance with the settlement hierarchy in Table 1. Hemel Hempstead, will be the principal focus for homes, jobs and strategic services, with the emphasis upon: (a) retaining the separate identity of the town; (b) enhancing the vitality and attractiveness of the town centre in accordance with Policy CS33; (c) maintaining a balanced distribution of employment growth, with growth and rejuvenation in the Maylands Business Park;

Core Strategy Reference	Amendment Reference	Amendment
		(d) maintaining the existing neighbourhood pattern; (e) making best use of existing green infrastructure; and (f) locating development a safe distance from hazardous installations.
		Any new development should:
		 i. be based on the neighbourhood concept; ii. provide <u>for</u> its own infrastructure; and iii. support relevant town-wide needs.
		The market towns and large villages will accommodate new development for housing, employment and other uses, provided that it:
		 (a) is of a scale commensurate with the size of the settlement and the range of local services and facilities; (b) helps maintain the vitality and viability of the settlement and the surrounding countryside; (c) causes no damage to the existing character of the settlement or its adjoining countryside; and (d) is compatible with policies protecting the Green Belt and Rural Area.
		The rural character of the borough will be conserved. Development that supports the vitality and viability of local communities, causes no
		damage to the existing character of a village and/or surrounding area and is compatible with policies protecting and enhancing the Green
		Belt, Rural Area and Chilterns Area of Outstanding Natural Beauty will be supported.
Monitoring/Delivery	-	
Location & Management of Devt: 8.13-16	-	
Policy CS2	-	
Policy CS3	-	
Monitoring/Delivery	-	
Towns & Large Villages: 8.17-20	-	
Policy CS4	-	
Monitoring/Delivery	-	
The Countryside: 8.21-26	-	
- Green Belt: 8.27-32	MC10	8.29 The Green Belt will be protected from inappropriate development in accordance with national policy and remain essentially open in character. There are some circumstances where inappropriate development may be supported. Development will only therefore be supported in limited circumstances. These exceptions include development that supports the vitality and viability of rural settlements and proportionate investment in homes and existing commercial premises that help maintain a 'living' countryside.
	MC11	8.30 Within the Green Belt there are a number of major developed sites which largely predate the current planning system and the Green Belt designation. Redevelopment or limited infilling of selected sites may help to secure economic prosperity, achieve social objectives or
		environmental improvements. The selection of major developed sites should support these objectives and be based on the following criteria: (a) the sites are substantial in size; (b) they contain a significant amount and scale of built development; and (c) they can accommodate further development without prejudicing Green Belt objectives. These sites are subject to the same controls as other development. National policy allows 'Major Developed Sites' to be designated, where redevelopment or infilling can take place in a controlled way. In this context 'infilling' means the filling in of small gaps between existing built development within the cites. It is important to ensure that any new development does not increase the cites' impact on the enemoses and
		development within the sites. It is important to ensure that any new development does not increase the sites' impact on the openness and functioning of the Green Belt. Infilling will be taken to mean the infilling of small gaps between existing development within the site.
	MC12	8.31 The location of these Major Developed Sites is set out current list of major developed sites in Table 2 may be added to. Their and their external boundaries are illustrated will be shown on the Proposals Map. These sites have been identified based on the following criteria:
		(a) they are substantial in size; (b) they contain a significant amount and scale of built development; (c) they contain a significant amount and scale of built development;
		(c)—they can accommodate further development without prejudicing Green Belt objectives; and

Core Strategy Reference	Amendment Reference	Amendment
		(d) their redevelopment, or limited infilling, will help to secure economic prosperity or achieve environmental improvements.
	MC13	8.32 These criteria will be used when considering if further Major Developed Sites in the Green Belt should be designated in the future.
Table 2	-	
Policy CS5	MC14	Policy CS5: Green Belt
		The strict application of Council will apply national Green Belt policy which permits appropriate development will be used to protect the openness and character of the Green Belt, local distinctiveness and the physical separation of settlements.
		There will be no general review of the Green Belt boundary, although local allocations (under Policies CS2 and CS3) will be permitted.
		Within the Green Belt, small-scale development will be permitted: i.e.
		(a) <u>building</u> for the uses defined as appropriate in national policy;
		 (b) for the replacement of existing buildings for the same use; existing houses (on a like for like basis); and (c) for limited extensions to existing buildings;
		(d) the appropriate reuse of permanent, substantial buildings; and
		(e) the redevelopment of previously developed sites 14, including major developed sites which will be defined on the Proposals Map
		provided that:
		 i. there is it has no significant impact on the character and appearance of the countryside; and ii. if relevant, the development will it supports the rural economy and maintenance of the wider countryside.
		Further guidance will be provided. No general review of the Green belt boundary is proposed, although local allocations (under Policies CS2 and CS3) 2will be permitted).
		Development within selected small villages in the Green Belt will be permitted in accordance with Policy CS6.
		Proposals for designated Major Developed Sites will be determined in the context of national Green Belt policy.
		Footnote: 14 Excluding temporary buildings
Monitoring/Delivery	MC15	Delivery will be achieved by:
		 identification of local allocations and boundaries of the selected small villages and <u>major developed sites</u> Major Developed Sites and detailed approach to infilling and redevelopment of <u>major developed sites</u> Major Developed Sites through the Site Allocations DPD. the Development Management DPD; and
		 support of countryside management initiatives with partner through organisations such as the Hertfordshire Countryside Management Service (CMS).
- Selected small villages (GB):8.33-34	-	wianagement service (etvis).
Policy CS6	-	
Monitoring/Delivery	-	
- Rural Area:8.35-36	-	
Policy CS7	MC16	Policy CS7: Rural Area
		Within the Rural Area, the following uses are acceptable:
		(a) agriculture; (b) forestry;
		88

Core Strategy Reference	Amendment Reference	Amendment
		 (c) mineral extraction; (d) countryside recreation uses; (e) social, community and leisure uses; (f) essential utility services; and (g) uses associated with a farm diversification project, which can be demonstrated to be necessary for the continuing viability of the farm business and consistent with the principles of sustainable development.
		Small-scale development will be permitted: <u>i.e.</u>
		 i. for the above uses; ii. for the replacement of existing buildings for the same use; houses (on a like for like basis); and iii. for limited extensions to existing buildings; iv. the appropriate reuse of permanent, substantial buildings; and v. the redevelopment of previously developed sites¹⁵
		provided that: i. it has no significant impact on the character and appearance of the countryside; and
		ii. <u>it supports the rural economy and maintenance of the wider countryside.</u> Further guidance will be provided.
		Small-scale development for housing, employment and other purposes will be permitted at Aldbury, Long Marston and Wilstone, provided that it complies with Policy CS1: Distribution of Development, and Policy CS2 Selection of Development Sites.
		Footnote: 15 Excluding temporary buildings
Monitoring/Delivery	-	
9. Enabling convenient access		
Text: 9.1-11	MC17	9.7 All major new development proposals <u>will be subject to a transport assessment, covering the relevant parts of the highway network and transport infrastructure. Proposals should include provide for necessary road works and a package of sustainable transport measures to reduce reliance on the private car, including a . A transport assessment and comprehensive travel plan must accompany such schemes.</u>
	MC18	9.11 The Local Transport Plan is the delivery vehicle for transport improvements in the county. It has a number of priorities covering tackling congestion, accessibility planning, providing safer roads, and improving air quality and quality of life for residents. The West Hertfordshire Area Transport Plan and the Urban Transport Plans for the towns (only Hemel Hempstead completed to date) will provide a more detailed local focus to the LTP. The Core Strategy seeks to complement and deliver the priorities, plans and programmes of the LTP and related strategies.
Table 3	-	
Policy CS8	-	
Policy CS9	-	
Monitoring/Delivery	-	
10. Securing quality design		
Text: 10.1-5	-	
Successful urban design: 10.6-9	-	
Figures 11-13	-	
Quality of the built environment: 10.10-14	-	
Policy CS10	-	
Policy CS11	-	

Core Strategy Reference	Amendment Reference	Amendment
Policy CS12	MC19	Policy CS12: Quality of Site Design
		On each site development should:
		(a) provide a safe and satisfactory means of access for all users;
		(b) provide sufficient parking and sufficient space for servicing;
		(c) avoid visual intrusion, loss of sunlight and daylight, loss of privacy and disturbance to the surrounding properties;
		(d) retain important trees or replace them with suitable species if their loss is justified;
		(e) plant trees and shrubs to help assimilate softly screen development and softly screen settlement edges;
		(f) integrate with the streetscape character; and
		(g) respect adjoining properties in terms of: i. layout;
		ii. security;
		iii. site coverage;
		iv. scale;
		v. height;
		vi. bulk;
		vii. materials; and
		Viii. landscaping and amenity space.
Quality of the public realm: 10.15-20	-	
Policy CS13	-	
Monitoring/Delivery	-	
Strengthening Economic Prosperity		
Strategic Objectives	-	
11. Creating jobs and full employment Text: 11.1-9	_	
Table 4	_	
Low Carbon Economy: 11.10-13	-	
Maylands Business Park: 11.14	-	
Supporting tourism: 11.15-17	_	
Policy CS14	-	
Monitoring/Delivery	-	
12. Providing for offices, industry, etc		
Text: 12.1-4	MC20	12.1 Employment uses (offices, research, industrial, storage and distribution, also called B-class uses) are a key component of the local economy, and provide just under half of all jobs in the borough. Most of these types of uses are located within General Employment Areas (GEAs), whose role is to ensure that appropriate land is set aside and protected for different employment uses. The <u>principal GEAs</u> are located <u>in across</u> the three towns, <u>with one in Markyate</u> . The Maylands Business Park is made up of five separate GEAs and is the largest concentration of employment floorspace in the borough. The majority of the jobs growth forecast for employment uses will be directed there as part of the regeneration aims to strengthen its role. Whilst the general approach is to prevent the loss of employment floorspace within GEAs, the Hicks Road GEA in Markyate will be remodelled through mixed use redevelopment (see section 26).
Offices: 12.5-10	-	
Industry, storage etc: 12.11-13	-	
Policy CS15	-	
Monitoring/Delivery	-	
13. Supporting retailing and commerce		
Text: 13.1	-	
Retail hierarchy: 13.2-4	MC21	13.2 The role of the retail hierarchy (shown in Table 5) is to ensure that new retail development takes place in appropriate locations and at

Core Strategy Reference	Amendment Reference	Amendment
		appropriate scales. The centres in the borough are designated as town or local centres. Hemel Hempstead, as the primary town centre will be the focus for future major retail development, whilst Berkhamsted and Tring will accommodate a smaller amount of new retail development. The level of new development may reach the demand forecasts in Policy CS16: these forecasts will be more reliable for the shorter term (i.e. to 2021).
	MC22	13.3 Local centres will play a smaller, but complementary role in meeting overall retail needs, although their focus is on providing services and facilities to serve their local communities. The availability of such accessible shops and services is vital, and the Council will support their provision and retention where it can. New development of retail and compatible uses will be encouraged in local centres where it is commensurate in scale with the size, role and function of the centre. A new local centre will be created at the Heart of Maylands to serve the needs of the business and local residential community. The precise nature and scale of this local centre will be determined through the East Hemel Hempstead Area Action Plan.
Table 5	-	
Shopping areas: 13.5-6	-	
Out of centre retail development: 13.7-12	MC23	13.9 The sequential approach <u>adopted by the Council</u> requires new retail development to be delivered in central locations first; this supports the vitality and viability of centres and is a sustainable approach to development. The sequential approach stipulates that retail development is delivered on sites in the following order of preference:
		1. locations in shopping areas in appropriate existing centres;
		2. other locations within these centres;
		2.3. edge of centre locations, with preference given to sites that are or will be well-connected to the centre; and
		3. 4. out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which
		are closest to the centre and have a higher likelihood of forming links with the centre.
Table 6	-	
Policy CS16	-	
Monitoring/Delivery	-	
Providing Homes and Community Services		
Strategic Objectives	-	
14. Providing homes		
Text: 14.1-8	-	
Housing supply: 14.9-23	MC24	14.13 The Council expects delivery to be around the total shown by Table 8. Housing supply will not however be open ended and will be managed. Delivery will be phased so that the development of housing sites can be co-ordinated with associated infrastructure and services. The broad approach to phasing is set out in Policy CS2, with more detailed requirements in the Site Allocations DPD.
	MC25	14.14 The Council will maintain a continuous 5-year and 15-year rolling housing land supply. Housing supply will not be open-ended and
		will be managed in order to conserve land and make the most effective use of it. This applies throughout the plan period, and afterwards
		when it is anticipated there will continue to be housing needs which should be met. A regular supply of housing land will help promote
		activity in the construction industry, which is an important part of the local economy. Action may be required to influence factors governing
	E8	the supply in the light of progress. This will be reported through the Annual Monitoring Report.
	MC26	Footnote to 14 This <u>will include</u> any additional percentage figure required by national policy. 14.15 Delivery will be phased so that the development of housing sites can be co-ordinated with associated infrastructure and services. The
	IVICZO	broad approach to phasing is set out in Policy CS2, with more detailed requirements in the Site Allocations DPD. The management of local
		allocations will build some flexibility into the housing programme (Policy CS3). However should supply fall significantly below expectations,
		the Council will take action to stimulate supply. A shortfall of 15% will be used as a trigger for action. The Council will consider the options
		that may be available at that time: e.g. release of its own land and/or investment in specific infrastructure to unblock a site. The management
		of local allocations, including possible release of a site earlier than intended, will build some flexibility into the housing programme (Policy
		CS3). Such circumstances and decisions will be reported through the Annual Monitoring Report.
Table 7	-	
Table 8	-	

Core Strategy Reference	Amendment Reference	Amendment
Table 9	-	
Policy CS17	-	
Monitoring/Delivery	-	
Housing mix: 14.24-30	-	
Policy CS18	-	
Monitoring/Delivery	-	
Affordable housing: 14.31-38	-	
Policy CS19	MC27	Policy CS19: Affordable Housing
		 Affordable homes will be provided: on sites of a minimum size 0.3ha or 10 dwellings (and larger) in Hemel Hempstead; and elsewhere, on sites of a minimum size of 0.16ha or 5 dwellings (and larger).
		A financial contribution will be sought in lieu of affordable housing on sites which fall below these thresholds.
		35% of the new dwellings should be affordable homes. Higher levels may will be sought on sites which are specified by the Council in a development plan document, provided development would be viable and need is evident. On rural housing sites 100% of all new homes will be affordable on rural housing sites (Policy CS20) will normally be affordable (Policy CS20).
		A minimum of 75% of the affordable housing units provided should be for rent.
		Judgements about the level, and mix <u>and tenure</u> of affordable homes will have regard to:
		 (a) the Council's Housing Strategy, <u>identified housing need</u> and other <u>relevant</u> evidence (see Policy CS18); (b) the potential to enlarge the site; (c) the overall viability of the scheme and any abnormal costs; and (d) more detailed guidance in the Affordable Housing Supplementary Planning Document <u>arrangements to ensure that the benefit of all affordable housing units passes from the initial occupiers of the property to successive occupiers</u>
		Arrangements will be made to ensure that the benefit of all affordable housing units will pass from the initial occupiers of the property to successive occupiers.
		Further, detailed guidance is provided in the Affordable Housing Supplementary Planning Document.
Policy CS20	-	
Monitoring/Delivery	-	
Travelling communities: 14.39-46	-	
Table 10	-	
Policy CS21	-	
Policy CS22	-	
Monitoring/Delivery	-	
15. Meeting community needs		
Delivering community services: 15.1-17	E9	Delivering community services and facilities Social infrastructure
	MC28	15.1 The fundamental day to day living needs and the well-being of society are dependent The well-being of Dacorum's communities depends on having the appropriate social infrastructure. The infrastructure described in Figure 14 is essential to provide the facilities and services which underpin quality of life and deliver day-to-day living needs. to deliver the required social and community services and facilities.
	MC29	15.2 The Dacorum Sustainable Community Strategy and the local planning system both aspire aspires to promote and improve community well-being, although it recognises there are resource constraints. and help to provide the mechanisms to deliver the social infrastructure needed The Council also aims to help will work with the agencies who provide social infrastructure, to supply the right facilities in the right place.
	MC30	15.3 Collaborative working, consultation and a variety of technical studies have helped to understand the opportunities and issues, and will continue to do so. concerning social infrastructure. The first Infrastructure Delivery Plan has reviewed the existing social infrastructure in

Core Strategy Reference	Amendment Reference	Amendment
		the borough and established future requirements of a growing population to 2031. <u>Work on this plan</u> Through consultation with infrastructure providers, the work established where the demands for certain services and facilities were are not being met and where there was are any oversupply issues. Infrastructure providers' future The service plans of infrastructure providers and requirements arising from projected population levels yield give a schedule of infrastructure requirements to 2031.
	MC31	15.14 The 'Place Shaping' workshops around the borough identified a need to improve existing <u>community</u> facilities and consider further provision of community services and both facilities <u>and services</u> . These facilities <u>should</u> were primarily <u>be</u> for young people and the elderly. with the requirement <u>Specific needs</u> for new large community centres/halls <u>and cultural centres</u> , space for local faith groups, <u>as well as cultural centres</u> and more open space, <u>were identified</u> . Some new provision is indicated Specific needs are identified in the Place Strategies, and additions are possible.
Figure 14	MC32	Social infrastructure includes:
		 early years education to further education; primary and secondary health care; open space, outdoor leisure and indoor sports facilities; libraries; community buildings and facilities for childcare, community care, general welfare, worship and social contact; culture, leisure and civic duties; specialist facilities such as a prison; job centre and related facilities; and cemeteries; and premises for emergency services and related facilities such as fire hydrants. open space, outdoor leisure and indoor sports facilities; libraries; and buildings and facilities for childcare, community care, general welfare, worship, social contact, culture, including arts and entertainments, leisure and civic duties.
Delivering leisure and facilities: 15.18-25	MC33	Delivering leisure and cultural facilities
	MC34	 15.23 There are a wide range of benefits in providing and promoting a variety of cultural activities and facilities. These include: creating a rich, vibrant and diverse mix of uses which can act as a catalyst for regeneration in town centres; encouraging a sense of personal well-being, pleasure and enjoyment; enriching the quality of life of the community and visitors to the borough; generating tourism and creative industries which can contribute to the local economy; increasing awareness of the countryside, traditional crafts and local food production conserving the cultural and historic heritage; improving mental and physical health of residents; providing many and varied social benefits through the development of work and projects with local community organisations and with groups at risk of exclusion; supporting citizenship and community identity and safer and stronger communities; and providing an opportunity to build on Dacorum's cultural diversity. 15.24 The regeneration of Hemel Hempstead town centre is a springboard for the delivery of further cultural and tourist facilities. Its key
		15.24 The regeneration of Hemel Hempstead town centre is a springboard for the delivery of further cultural and tourist facilities. Its key ambitions include the provision of a new library, community facilities, additional open space and improvements to the accessibility of existing green space and the River Gade (see section 20). These will benefit the local communities and visitors alike.
	MC36	15.25 New opportunities for heritage, arts and cultural <u>activities</u> businesses and links between local schools and communities will also be supported, particularly as part of mixed use developments and regeneration schemes.
Policy CS23	-	

Core Strategy Reference	Amendment Reference		
Monitoring/Delivery	-		
Looking after the Environment			
Strategic Objectives	-		
16. Enhancing the natural environment			
Text: 16.1	-		
Protecting/improving the landscape: 16.2-8	MC37	16.2 The majority of Dacorum is within the Chilterns National <u>Character Landscape</u> Area ¹ . Whilst the character of <u>the</u> south eastern section has been eroded through 20 th century development, much of the remainder is protected by its designation as an Area of Outstanding Natural Beauty (AONB).	
	MC38	16.5 A more detailed landscape assessment for Dacorum divides the borough's countryside into 30 different landscape character areas. Footnote: Landscape Character Assessment for Dacorum	
Map 2	MC39	See Figure. Correct the notation for the Chilterns. Show additional scarp slope through Aldbury Nowers.	
Green infrastructure: 16.9-16	-		
Map 3	MC40	See Figure. Correct inconsistencies in the key – delete Wendover Woods and amend the Chiltern Woodlands (SAC) notation. Reposition the Tring-Wendover green infrastructure link to the south.	
Biodiversity/geological conserv'n:16.17- 24	MC41	16.17 Biodiversity and geological resources are a key an essential component of green infrastructure. Their protection will vary varies according to their relative importance (see Figure 15), the highest being international importance.	
	MC42	New paragraph after 16.17	
		Potential damage to the Chiltern Beechwoods (SAC) from development proposals will be subject to special assessment. A precautionary	
		approach, avoiding damage and encouraging alternative natural greenspace, will be pursued: mitigation of damage may be appropriate, but	
		only as a secondary option. The general principles of avoidance and mitigation will be applied by the Council, when considering impacts on	
		any site of biodiversity or geological interest.	
	MC43	Second new paragraph after 16.17	
		Important landforms and geology will be designated as Regionally Important Geological and Geomorphological Sites, e.g. the Bourne gutter	
		and pingos on Boxmoor. Their management and interpretation can provide local communities with enjoyment and an appreciation of the	
		characteristics of the Chilterns chalk landscape and how it has evolved.	
	MC44	16.18 The Habitat Survey for Dacorum ⁴ identified over 200 Wildlife Sites , some of which overlap with higher designations . This list is	
	WC44	updated annually by the Hertfordshire Wildlife Sites Partnership, when new sites are identified or existing sites lose their nature conservation value.	
	MC45	16.19 Not all areas of importance to biodiversity are protected by the formal designations shown in Figure 15. Features such as the Grand	
		Union Canal, river valleys, chalk streams, areas of ancient semi-natural woodland, orchards, nature reserves, important trees and hedges and other local green spaces within towns and villages are collectively very significant and need protection. Opportunities will be taken to create new greenspace, designate new Local Nature Reserves (LNRs) to meet the local accessibility standards set by Natural England and support countryside management initiatives. Better management of the water resource and restoration of seasonal flows in the chalk streams, which are suffering from over-abstraction, will be critical.	
	MC46	16.20 The increasing fragmentation of habitats will be addressed. Many areas have become isolated 'islands,' increasingly vulnerable to	
		extreme weather conditions, disease and climate change. Habitat fragmentation is greatest at Hemel Hempstead and in the southern and eastern part parts of the borough.	
	MC47	16.21 Key Biodiversity Areas ⁵ are identified on Map 3. They contain particularly high concentrations of either woodland, wetland, grassland	
	IVIC4/	or a broader mosaic of habitats and have the greatest potential for joining fragments of habitats and creating, restoring and managing large areas of quality habitat. Large scale biodiversity initiatives, such as the Living Landscapes Project, are expected to come from the national and	
		local conservation bodies. They will help guide priorities for nature conservation and sympathetic land management, and will therefore be	
		incorporated into the Green Infrastructure Strategy and related action plans.	

Core Strategy Reference	Amendment Reference	Amendment
	MC48	16.22 The Sustainability Offset Fund (Policy CS30) will help provide additional tree and woodland planting, to extend and supplement
		existing green corridors and habitats and to reinforce existing landscape belts. The biodiversity value of new landscaping and open space will
		be increased through careful design and the use of appropriate native species.
	MC49	16.24 Geological conservation has been less researched. The two Regionally Important Geological and Geomorphological (RIGGs) sites
		within the borough - and puddingstone boulders at Castle Hill, Berkhamsted – will be added to in the light of further information.
Figure 15	MC50	See Figure. Link 'County/subregional and Local'. Position RIGGSs below Wildlife Sites.
Policy CS24	-	
Policy CS25	-	
Policy CS26	-	
Monitoring/Delivery	MC51	Delivery will be achieved through planning and land management, by:
		 identification of development sites and their requirements within the Site Allocations DPD and East Hemel Hempstead AAP;
		 <u>following</u> the Development Management DPD and supplementary planning documents;
		 acting sensitively on the results of environmental assessments and analyses;
		 the use of the Landscape Character Assessments (including historic characterisation);
		 implementation of the Green Infrastructure and Green Space Strategies and Biodiversity Action Plan objectives;
		 adherence to the Chilterns Building Design Guide and associated technical notes;
		 implementation of the Management Plan for the Chilterns Area of Outstanding Natural Beauty and associated guidance;
		 partnership working with supporting broad based initiatives from national and local conservation organisations such as the Chilterns
		Conservation Board, Herts and Middlesex Wildlife Trust, Hertfordshire Biological Records Centre and the Hertfordshire Countryside
		Management Service, and working in partnership with them;
		 supporting measures which develop sound food and woodland economies and help maintain the countryside (e.g. farmers markets);
		 encouraging the take up of agri-environment grants through partners; and
		 implementation and monitoring of the Infrastructure Delivery Plan (IDP).
17. Conserving the historic environment		
Text: 17.1-17	E10	17.5 High quality design and proper maintenance can prevent the loss of original character in buildings. Conservation Conversion of
		buildings to alternative uses can extend the life of buildings and is preferable to demolition. Infilling and replacement with new characterless
		buildings and public realm should be avoided. This applies to both designated and undesignated historic assets.
	MC52	17.6 The Council needs to re-evaluate its historic heritage assets and their settings on a continual basis. This ongoing appraisal will inform
		further local designations and future management plans. This is a continual process and includes It will include a programme of Conservation
		Area Appraisals and a Heritage at Risk Review.
	MC53	17.7 Conservation Area Appraisals will analyse the character and appearance of each Conservation Area and identify any negative features
		or issues that could be addressed through development. Boundaries of Conservation Areas will be reviewed. The 'Heritage at Risk' review will
		identify vulnerable historic heritage assets: the Council will act to ensure their protection, using enforcement action, Article 4 Directions,
		building preservation and urgent work notices, spot listing and applications for funding.
Policy CS27	MC54	Policy CS27: Quality of the Historic Environment
1 0110		All development will favour the conservation of historic heritage assets.
		The integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected, conserved and if appropriate enhanced.
		Development will positively conserve and enhance the appearance and character of conservation areas. Negative features and problems identified in conservation area appraisals will be ameliorated or removed.

Core Strategy Reference	Amendment Reference	Amendment
		Features of known or potential archaeological interest will be surveyed, recorded and wherever possible retained.
		Supplementary planning documents will provide further guidance.
Monitoring/Delivery	MC55	Delivery will be achieved by:
		the Development Management DPD;
		having regard to Conservation Area Appraisals;
		developing the Historic Environment SPD;
		developing the Urban Design SPD;
		partnership working with the Archaeology team at the County Council; and
		 reviewing and maintaining inventories of historic heritage assets and management plans.
18. Using resources efficiently		
Text: 18.1-11	E11	Split paragraph 18.1 into two
		18.1 In providing for new homes, jobs and infrastructure, Local planning policies can help shape and design places with lower carbon
		emissions and renewable energy technologies, which are 'future-proofed' ⁶ , from the effects of climate change. 'Future proofing'
		development includes:
		minimising the use of natural resources;
		 reducing water run-off from hard surfaces and managing flood risk areas;
		generating less waste from development; and
		managing pollution.
	E12	New paragraph
		The benefits of reducing carbon emissions, and mitigating against and adapting the built environment for climate change include:
		 reduced heating and electricity bills due to better insulation and more efficient appliances;
		less reliance on fossil fuels;
		 support for the local economy by increased use of locally sourced sustainable materials;
		reduced water consumption;
		 'greening' the built environment by through biodiversity enhancements;
		 reduced 'heat stress'⁷ in urban environments; and
		an improved quality of life and feeling of well-being.
	E13	18.2 Key legislative and statutory directives aim to reduce carbon dioxide (CO ₂) emissions globally by at least 50% by 2050. In the UK, this is
		being driven by the Climate Change Act (2008), which has committed the Government to reducing CO₂ emissions by 26% by 2020 and an 80%
		reduction in all greenhouse gas emissions by 80% by 2050 (both from a 1990 baseline).
	E14	18.3 Apart from National mandatory standards, currently provided such as those provided for dwellings by the Code for Sustainable Homes,
		there will be similar mandatory standards for will apply to all other building types. Further changes are also expected to update the evolving
		national policy context National policy is evolving and further change is expected, including amendments to Building Regulations to further
		tighten standards.
	E15	18.4 The Council's approach is will aim to locate and design encourage new development to be located and designed so as to optimise its
		carbon performance and to support the supply of decentralised, renewable and low carbon energy sources. The Regional Spatial Strategy
		(2008) set sets a target of generating 10% of the region's energy from renewable sources by 2010 and 17% by 2020 (excluding offshore
		wind). To help cut water consumption from 150 litres per person per day, it also sets set targets for a 25% reduction in new development and
	F40	8% in existing development on 2006 rates.
	E16	18.5 In support of national and regional guidance and targets, the Hertfordshire Climate Change Partnership (HCCP) was set up to bring
		together the County's key organisations. HCCP has also been made responsible for the delivery of the Hertfordshire Local Area Agreement

Core Strategy Reference	Amendment Reference	Amendment
		which commits to a 9.1% cut in CO ₂ emissions (from a 2005 baseline) by 2011.
	E17	18.6 The Council signed the Nottingham Declaration on Climate Change in 2007, and has committed to tackling climate change is a key
		priority of in the Dacorum Sustainable Community Strategy.
	E18	18.7 The current energy performance of the borough has shown that, despite progress on the reduction of domestic energy consumption,
		there is a need to make improvements to domestic energy consumption, the existing housing stock, new development, and renewable and decentralised energy for the built environment.
	E19	18.8 The borough currently shows very good performance on the reduction of domestic energy consumption. Over the 10 years from 1996, domestic consumption has fallen fell by more than 20%, in line with targets. This was has been achieved mainly through relatively cheap insulation and efficiency measures, but it is estimated that more expensive measures will be needed from around 2015 onwards in order to maintain momentum. The borough has below South East region average annual per head domestic energy consumption - gas consumption is 10% lower and electricity 13% lower (Low and Zero Carbon Study 2010). Consumption is also below most other regional averages in the country.
	E20	18.9 Even though Nearly 30% of carbon emissions arise arose from energy use in <u>Dacorum's our</u> homes. <u>Yet,</u> there are <u>were</u> very few examples of private development in the borough in 2011 that <u>had</u> have been built to reduce these emissions through higher energy efficient
	F24	energy standards above the 2006 Building Regulations Part L, such as the Code for Sustainable Homes or BREEAM ⁸ .
	E21	18.10 There are also In 2011 there were no significant examples of renewable energy generation in the borough, apart from a few small-
	F22	scale wind turbines generating only a small amount of electricity.
	E22	New heading after paragraph 18.10
	E23	Carbon Emissions and Renewable Energy
	E23	18.11 The Council's approach to carbon emissions and renewable energy will be guided by the Energy Hierarchy (Figure 16). This expects
		This means that carbon emission reductions to will be delivered primarily through improvements to the energy efficiency performance
		improvements to of the building fabric and ensuring that carbon emissions reductions are 'future-proofed' for the life of the development.
		This will include improving the air-tightness of the building, before resorting to renewable energy technologies in order to meet the requirements for carbon emission targets. reductions. set out in Policy CS28
Figure 16	_	requirements for carbon emission <u>targets.</u> reductions, set out in Folicy esza
Renewable energy: 18.12-18	E24	Renewable Energy
Treflewable effergy: 10.12-10	MC56	U.
	IVICOO	New paragraph after paragraph 18.11
		Government policy intends that all new buildings should be built to a zero carbon standard within the next ten years, and at some point
		afterwards new development should normally have a neutral carbon impact. Minimum standards or targets will be identified through the
		Building Regulations and the Code for Sustainable Homes or equivalents. The pace of change and level of compliance will depend on:
		• the timing of Government regulation or advice:
		• the opportunity (to exceed the minimum); and
		cost affecting viability of schemes.
		Opportunity is related to size of scheme and location. There are opportunities in Dacorum to exceed the minimum pace of change,
	110	particularly for larger developments and where heat and energy demands will be relatively high.
	MC57	Second new paragraph after paragraph 18.11
		Zero carbon buildings will be achieved through control of building design and construction (e.g. the amount of insulation). This covers
		regulated emissions and is shown as Stage 3 in Table 11. Carbon neutral status can be reached, if, in addition, occupiers manage how they use
		their buildings and appliances (i.e. unregulated emissions) particularly carefully. If specific targets cannot be met, there are allowable
		solutions which can be used to compensate.
	MC58	Third new paragraph after paragraph 18.11

Core Strategy Reference	Amendment Reference	Amendment
		The Council has adopted a progressive approach which minimises carbon dioxide emissions. The Council will accept the delivery of
		standards/targets in Table 11 and any supplementary guidance, as minimising CO ₂ emissions. Standards and targets will be used as guidelines,
		allowing a degree of flexibility so as not to prevent necessary development.
	MC59	Merge paragraphs 18.12 and 18.13
		18.12 The A 'Low and Zero Carbon Study' has been undertaken at a county wide level and includes maps of mapped existing CO ₂ emissions,
		and higher levels of levels of demand for electricity and heat, and opportunities and constraints for decentralised energy. demands in
		the borough. The maps demonstrate that Areas of high energy demand and related CO ₂ emissions from existing buildings are
		concentrated in the higher density areas of major settlements.
		18.13 The Energy Opportunities Plan (Map 4) in the study demonstrates the opportunities and constraints for decentralised energy. The plan
		identifies District Heating Opportunity Areas The Study therefore suggested opportunities for district heating in the borough's town centres
		and Maylands Business Park and through any large-scale greenfield development. There are also It also suggested opportunities to harness
		wind power. However these opportunities have been identified Natural opportunities for wind power are in the countryside, particularly in
		the Green Belt (see Map 4): they are constrained by environmental policies (e.g. Policies CS5 and CS 24). clear justification is required to take
		these forward (Policy CS5).
	E25	Merge paragraph with paragraph 18.17
		18.14 Given the borough's rural and urban character, and prospects for urban regeneration in Hemel Hempstead, The Council considers that
		District Heating Opportunity Areas and Combined Heat and Power (CHP) should will be pursued in high density areas targeted for
		regeneration (see Map 4). There are also opportunities for these Systems could to be powered by local biomass ¹⁰ and appropriate waste that
		is not being recycled for other purposes. Micro-generation technologies, particularly solar water heating, photovoltaics and heat pumps will
		also help reduce carbon emissions.
	E26	18.15 Due to opportunities for high density development in some areas of the borough, combined with constraints elsewhere, there is
		justification for carbon reduction targets that exceed the mandatory stepped changes associated with Part L of Building Regulations. An
		appraisal of cost compliance is set out in the Low and Zero Carbon study.
	E27	18.16 The stepped change away from Part L of Building Regulations (the Code for Sustainable Homes/ non-residential equivalent) will be
		directed towards District Heating Opportunity Areas. New development outside the District Heating Opportunity Areas will be expected to
		comply with Building Regulations Part L as a minimum, with the exception of higher water efficiencies (Policy CS29), requirements to consider
		the whole life cycle of the building (Policy CS29) and delivering on site carbon reductions (Policy CS28).
	E28	18.17 Within the identified District Heating Opportunity Areas, major new development (10 dwellings and above/1000sqm of non-
		residential and above) will be expected to deliver networks of district heating to help the borough meet renewable energy targets and to
		improve energy efficiency (see Table 11). The proposed Green Energy Centre in the Maylands Business Park will help fulfil these ambitions
		and help raise awareness of best practise. Smaller developments in, or close to, District Heating Opportunity Areas should consider delivering
		suitable technologies to enable connection to district heating networks in the future.
	E29	18.18 More detailed guidance about District Heating Opportunity Areas and Wind Opportunity Areas will be given in delivered through a
		Supplementary Planning Document.
Map 4	E30	See Figure. Amend title: Energy Opportunities Plan Opportunities for Renewable Energy. Simplify map to show the principal district heating
		opportunity areas and opportunities for wind turbines only.
able 11	MC60	Table 11: Progress towards Zero Carbon in New Development Step Changes in the Code for Sustainable Homes and Additional CO2
		Reductions compared to Building Regulations Part L 2010

Core Strategy Reference	Amendment Reference			Amendment	
		Effects to new	From Oct 1 st 2010	From 2013 Stage 2**	From 2016*** or 2019
		development in	Stage 1 - 2011		Stage 3 onwards***
		different parts of the			
		borough Location			
		For development <5 dwel	lings or non-residential developr	<u>ment <235sqm</u>	A minimum of Code Level 6
		In the whole borough	A minimum of Code Level 3	A minimum of Code Level 4 (or	(or equivalent) for
		for development <5	(or equivalent) for residential	equivalent) for residential	residential development.
		dwellings or non-	development.	development.	Comply with Part L2A 2019
		residential development	Comply with Part L2A* 2010	Comply with Part L2A 2013	Building Regulations (or
		<235sqm	Building Regulations as a	Building Regulations as a	equivalent guidance) as a
		Whole Borough	minimum for non-residential	minimum for non-residential	minimum for non-
			development.	development.	residential development.
		For development ≥5 dwel	lings or non-residential developr	ment ≥235sqm	Progression through Code
		Whole Borough except	As above, plus an additional	As above, plus an additional	Levels 5 and 6 (or
		<u>DHOAs</u>	5% CO ₂ reductions for	5% CO ₂ reductions for	equivalent) for residential
		Outside DHOAs ² for	residential and non-	residential and non-residential	development.
		development ≥5	residential development as a	development as a minimum.	Comply with equivalent
		dwellings or non-	minimum.		Building Regulations or
		residential development			standards as a minimum
		≥235sqm			for non-residential
		Inside DHOAs	A minimum of Code Level 4 or	A minimum of Code Level 5 (or	development.
		for development ≥5	equivalent for residential	equivalent) for residential	
		dwellings or non-	development.	development.	
		residential development	Comply with Part L2A 2010	Comply with the CO ₂	
		≥235sqm	Building Regulations plus an	reductions associated with	
			_	Code Level 5 (or equivalent)	
			as a minimum for non-	for non-residential	
			residential.	development as a minimum.	
		** This requirement will i.e. expected to be Pa	rt L 2013.	date to Part L 2010 is published that	is equivalent to Code Level 4 energy improvements art L 2013 of the Building Regulations (or equivalent)
					achieved. This is expected from 2016 for residential
		•	m 2019 for non-residential developm	nent.	
		DHOA District Heating Oppor	<u>tunity Area</u> Ite to the Code for Sustainable Home	25	
	E31	•		<u>ः</u> ntified in the Hertfordshire-wide ।	ow and Zero Carbon Study
Sustainable design/construction:18.19-26	MC61		, ,		has significant impacts on the built and natural
		•		· •	ning and constructing buildings that which help
		·			ecommissioning buildings, can, not only, reduce
		· · · · · · · · · · · · · · · · · · ·	•		ste management plans will help by encouraging
		reuse of materials, reducti	on of waste and recycling. Ther	efore <u>Where practical,</u> develope	rs should be considering the refurbishment of

Core Strategy Reference	Amendment Reference	Amendment
		existing buildings before considering demolition. New development should provide the necessary physical infrastructure, including drainage
		and sewerage: developers should also provide adequate sewerage facilities for new development and ensure that there is sufficient capacity
		at the relevant wastewater treatment works (see section 28).
	MC62	18.22 Sustainable design and construction also provides an opportunity to retain and enhance biodiversity includes measures such as the
		planting of native species, the nature of landscaping, "green" roof design, water management and the provision of nesting sites or roosts.
		These are recommended to help sites link with wildlife corridors and the wider natural environment. Enhanced biodiversity will improve the
		Apart from improving quality of life and property values, as well as enhanced biodiversity also delivers delivering ecological benefits. While all
		living plant matter absorbs CO ₂ , trees process more due to their large size and extensive root structure ¹² . One hectare of woodland can
		absorb emissions equivalent of 100 family cars (with high emissions). Trees can also remove sulphur dioxide from the atmosphere, attenuate
		noise pollution, provide natural air conditioning and shade, and moderate the rate of water run-off through rainfall attenuation, which
		reduces the risk of flooding. Therefore, new development will be expected to retain and replace existing trees, and help to plant more trees
		to expand the tree canopy in the borough.
	E32	18.23 Developers will be expected to complete a Sustainability Statement and carbon compliance check online for in support of their
		proposals. When the appropriate carbon reductions would not be delivered on site, compensation will be required in the form of payments
		Payments will also be required into to a Sustainability Offset Fund. when the appropriate carbon reductions have not been delivered on-site.
		The fund will be used to support initiatives that help measures which reduce carbon emissions in the existing building stock, fix or absorb
		carbon (for example, by planting trees) and support on and off-site renewable energy supply. Tree planting and other 'greening' initiatives
		will help to enhance biodiversity, improve quality of life and wellbeing and reduce 'heat stress' in built up areas. the urban environment.
	E33	18.24 Payments may also be made to put into the Sustainability Offset Fund as part of the allowable solutions to deliver zero carbon
		development (see Table 11) in-line with Building Regulation changes to Part L), although and carbon neutral development. The the following
		allowable solutions must however be considered first:
		 carbon reductions on-site, through energy efficiency, low carbon and zero carbon technologies or on-site generation;
		 connection to a district heating network;
		 reduction of unregulated emissions through energy efficient appliances etc.;
		 exporting low carbon or renewable heat from the development site to other developments; and
		 investing in low and zero carbon community heat infrastructure.
	MC63	Merge paragraph with paragraph 18.26
	WOOS	18.25 Further guidance advice will be provided to:
		explain the Council's phased approach to zero carbon and carbon neutral developments:
		 support the implementation of the <u>Sustainability</u> Carbon Offset Fund; and
		give further consideration to the allowable solutions required.
	E34	18.26 Further advice and practical sustainable development solutions are proposed in Hertfordshire's Building Futures Design Guide for
		use by developers, planners and the general public. The guide is an evolving website with provides practical case studies and is an evolving
		best practice guide guidance for new development.
Policy CS28	-	
Policy CS29	MC64	Policy CS29: Sustainable Design and Construction
•		New development will comply with the highest standards of sustainable design and construction possible. The following principles should normally be satisfied:
		 (a) Use building materials and timber from verified sustainable sources; (b) Minimise water consumption during construction; (c) Recycle and reduce construction waste which may otherwise go to landfill.
		(d) Provide an adequate means of water supply, surface water and foul drainage;

Core Strategy Reference	Amendment Reference	Amendment	
Policy CS30	_		
Monitoring/Delivery	MC65	Delivery will be achieved by: identifying key sites for decentralised renewable energy in the Site Allocations DPD; developing policy in the Development Management DPD and other guidance; requiring Sustainability Statements and using a carbon compliance toolrequiring Sustainability Statements; adherence to the Hertfordshire Joint Municipal Waste Spatial Management Strategy; compliance with Building Regulations; use of using a Sustainability Offset Fund; public and private partnership to deliver community-scale infrastructure; and joint working with Council's Energy Conservation team and the Home Energy Conservation Association (HECA).	
	E35	Merge paragraphs 18.32 and 18.33 18.32 New building will be directed away from areas vulnerable to flooding. The A Strategic Flood Risk Assessment, incorporating the sequential approach to flood risk and agreed with the Environment Agency, has informed the selection of the strategic development sites and broad locations the main areas for development in Dacorum. The sequential approach relating to flood risk set out in national policy has also informed the selection of sites. Most The majority of the proposed development in Dacorum will be accommodated outside flood zone areas Flood Zones 2 and 3 (the main areas vulnerable to flooding), but there will be some exceptions. For example, redevelopment and change will occur in central areas such as Hemel Hempstead Town Centre. and any Any new development in Flood Zones 2 or 3 within flood zones will be expected to must provide develop appropriate mitigation measures to reduce the cause and or risk of flooding This is to and avoid an any	

Core Strategy Reference	Amendment Reference	Amendment
		adverse impact on the quality of the groundwater source or a risk to its ability to maintain a the public water supply.
		18.33 Development will be directed away from Flood Zones 2 and 3. Some types of development (such as those categorised as 'Less
		Vulnerable' and 'Water Compatible') may be appropriate within Flood Zone 3.
Sustainable resource managem't:18.27-41	E36	Merge paragraphs 18.34, 18.35 and 18.36
		18.34 A 'Water Cycle Study Scoping Report' has been jointly completed with Three Rivers District Council, St. Albans City & District Council,
		Welwyn Hatfield Borough Council and Watford Borough Council. The stakeholders involved in the process included the Environment Agency,
		Thames Water Utilities and Veolia Water Central amongst others. The study examined the condition of the existing distribution network and
		waste water treatment works and whether it they would be able to cope with additional development growth.
	MC66	18.35 The Scoping Study concluded that work would need to be progressed to the next stage (the Water Cycle Study Outline Report) The
		study concluded that further work would be necessary to establish:
		1) if Maple Lodge or Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce
		new physio-chemical standards; and
		2) how extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley; and
		3) whether any other sewerage upgrades were needed within the wider south and west Hertfordshire area.
	E37	18.36 The local authorities and stakeholders involved will continue to plan for both of the necessary upgrades (see Section 28), as well as
		any other necessary action as an outcome of the Water Cycle Study Outline Report. This will be progressed with as part of the Site Allocations
		DPD.
	E38	Footnote ¹⁵ Water Cycle Study Scoping Report, 2010 - a technical document supporting the Core Strategy , commissioned by Dacorum
		Borough Council, Three Rivers District Council, St. Albans City & District Council, Welwyn Hatfield Borough Council and Watford Borough
		Council, with the support and involvement of the Environment Agency, Thames Water Utilities and Veolia Water Central
	E39	Split paragraph 18.39 into two.
		18.39 In Dacorum special consideration also needs to be given to:
		the quality of the groundwater supplying the chalk aquifer;
		 protecting the habitat and biodiversity of chalk streams;
		 the maintenance of higher quality agricultural areas and the sand and gravel belt;
		 limiting the effects of noise and air pollution along major routes (i.e. road, rail and aircraft from Luton Airport);
		retaining tranquil parts of the Chilterns Area of Outstanding Natural Beauty and Boarscroft Vale; and
		the risks associated with Buncefield Oil Terminal.
	MC67	New paragraph (the second part of the original paragraph 18.39).
	Wiedr	The planning system has a role to play in the minimisation of waste at or near source and in the disposal of household, commercial and
		construction waste. Unnecessary waste should be reduced and managed nearer to its source. To avoid unnecessary waste going to landfill
		sites, developers will be expected to avoid potentially polluting developments, the creation of additional waste, and the location of new
		development near existing sources of pollution. This may involve Where waste is unavoidable it will need to be transferred and managed.
		Waste recycling and management will be appropriate in many General Employment Areas. New facilities may be provided through the
		relocation of the existing Household Waste Recycling Centre and Waste Disposal Centre as part of a new Energy and Waste Park in the
		Maylands Business Park area in East Hemel Hempstead.
	MC68	· · · · · · · · · · · · · · · · · · ·
	IVICOO	18.40 Hertfordshire County Council is the Waste Disposal Authority and the Waste Planning Management Authority for Dacorum Borough
		Council. The suite of waste related documents include The Waste Core Strategy and Development Management Policies, and Waste Development Framework for Hortfordshire. The
		Allocations and Waste Development Policies documents form part of the Minerals and Waste Development Framework for Hertfordshire. The
		Development Plan Documents on waste set out the County Council's overall vision and strategic objectives for waste planning and establishes

Core Strategy Reference	Amendment Reference	Amendment
		the broad locations for strategic waste facilities: they also allocate sites, indicate areas of search for future waste uses. and contain minerals
		and waste safeguarding areas. The Framework will be used as a basis for future waste planning, and will be used in the determination of
		planning applications across Hertfordshire.
	E40	18.41 Air quality within Dacorum is generally good, with the main source of air pollution being from traffic emissions, specifically nitrogen
		dioxide. Following a programme of assessment, three areas were found to exceed air quality objectives for this gas and have been In 2011
		three areas were designated as Air Quality Management Areas (AQMAs) because levels of nitrogen oxide exceeded air quality standards: i.e.
		Lawn Lane, Hemel Hempstead;
		 London Road, Apsley, Hemel Hempstead; and
		High Street, Northchurch.
		The number and extent of AQMAs will change as a result of mitigation measures and continued monitoring of air quality.
	E41	18.41 18.42 Action plans will highlight mitigation measures for each AQMA. The planning system will be used to support these action plans.
		It does not necessarily follow that development would be harmful in an area of poor air quality or that it should be banned in an AQMA. Here,
		the type, scale and location of development and its traffic generation will be managed sensitively. Greater weight will be given to the
		consideration and removal of air pollutants. National Air Quality Standards identify the planning system as one of the key mechanisms for
		achieving improvements in air quality. It is not necessarily the case that proposed development in an area of poor air quality will have a
		negative impact. Similarly, it does not mean that there should be a ban on development within that area, rather, that greater weight should
		be given to the consideration and removal of the impacts. Actions Plans for each AQMA will highlight appropriate mitigation measures.
Policy CS31	-	
Policy CS32	-	
Monitoring/Delivery	E42	Delivery will be achieved by: • the restriction of development around the Buncefield Oil Depot through the East Hemal Hampstood AAD:
		the restriction of development around the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the East Hemel Hempstead AAP; A Depois Control of the Buncefield Oil Depot through the Buncefield Oil Depo
		the Development Management DPD;
		application of the Planning Obligations SPD;
		use of sustainability statements;
		• partnership working with the Council's Environmental Health department, the County Council, the Countryside Management Service
		and with external agencies and water authorities, such as the Environment Agency, Thames Water and Veolia Water UK;
		air quality monitoring undertaken across the borough;
		monitoring and standards set by external agencies; and
		Action Plans for designated Air Quality Management Areas
Place Strategies		
19. Introduction to Place Strategies		
Text	-	
Common Local Objectives	-	
20. Hemel Hempstead		
Context:20.1-5	-	
The Visions	-	
Local Objectives	-	
Delivering the town strategy: 20.6-11	MC69	20.7 The supply of business premises and jobs will be diverse. While major growth in the office sector will be promoted in the Maylands Business Park, there is an important role for designated employment land in Two Waters and Apsley. This will normally be retained. The heritage of the paper making industry will be conserved. The roles of local centres and out of centre locations will be maintained through environmental improvements and management of new development. Most new shopping facilities will be directed to the town centre.
	E43	20.9 Public transport services Access and movement will be improved between the town centre, Maylands Business Park and main railway
	-	station through network improvements and the provision of more convenient hubs or interchanges.

Core Strategy Reference	Amendment Reference	Amendment
Delivering the town centre: 20.12-13	MC70	20.13 Character Zones have been identified to guide regeneration in different parts of the town centre (described in Figure 17 and illustrated in Figure 21). Each <u>individual</u> zone will accommodate similar uses and/or a similar built or natural character. <u>Each zone will add something different to the centre, and collectively, the zones will complement each other.</u> <u>Large scale development in one zone should be sensitive to the character of the adjoining zone.</u> The Town Centre Master Plan will provide further guidance, particularly on the areas of greatest change and activity.
Figure 17	MC71	The Old Town - is based around the High Street, Queensway and the northern tip of the Marlowes. The main businesses include professional services, quality specialist shops. There is a strong evening economy with a variety of pubs, restaurants, cafes and an arts centre. The quality of the built environment in this zone is recognised for its special architectural and historic importance and the notable landmark of St Mary's Church. The historic character offers further opportunities for uses which can attract visitors and new investment. Sensitive improvements to north/south pedestrian links and the public realm are needed. Building frontages need careful attention: in particular, refurbishment of the building fascias along the northern tip of the Marlowes need refurbishing. improvement. Open land, which provides a setting for the old town and links with Gadebridge Park, will be protected.
	E44	The Gade Zone - includes the north western section of the town centre from Queensway to the Market Square Combe Street. Notable features include the River Gade and the Marlowes Methodist Church. This zone holds significant regeneration opportunities, primarily for educational, civic, residential and community uses, along with opportunities for decentralised heating systems or Combined Heat and Power (CHP).
	MC72	Original Marlowes Zone - contains part of the north eastern section of the Marlowes. Its notable feature is its listed villas. It includes services for the town centre such as a large doctors surgery and food stores, Asda and Iceland. This zone holds some redevelopment opportunities for residential, commercial and business uses, and has the potential to become a more attractive link between the Marlowes Shopping Zone and the Old Town. There are, for example, opportunities for better design and improvements to the building fascias of the listed buildings.
	MC73	Jellicoe Water Gardens - encompasses the whole of the listed Water Gardens area designed by Jellicoe, running from Combe Street to Moor End Road. The Gardens is one of the few surviving post war public landscapes specifically designed as part of the New Towns movement. It has the potential to become an outstanding public space again. Within the zone there are therefore opportunities to restore the Water Gardens, as well as rationalising rationalise bus connections and interchanges and improving improve the pedestrian environment along Waterhouse Street. Subject to design considerations, this zone could provide an alternative location for civic uses. The scale of surrounding new development should respect the special character of the Water Gardens.
	E45	The Marlowes Shopping Zone - is located around the Marlowes Shopping Centre, the pedestrian area and ramped area, and extends to Coombe Street. It is part of the prime retail pitch of the town centre and is in need of major investment. New stores can be accommodated. There is potential to create additional uses with active frontages and improve active frontages along the ramped area (at ground level) and Waterhouse Street. The area around the pedestrian gateway near the Market Square is a potential location for office uses.— There are opportunities to create a new covered public meeting space along the pedestrianised area, make improvements to building fascias, de-clutter the pedestrian environment, revamp the children's play area and deliver decentralised heating systems or CHP. The southern end has recently been enhanced by the Riverside retail development and riverside walk.
	MC74	The Hospital Zone - includes the hospital site, Paradise Fields, Paradise employment area, and the offices, hotel and surgery opposite. The hospital zone holds significant regeneration opportunities for residential, education, health and business uses, along with opportunities for improved pedestrian/cycle links, and decentralised heating systems or CHP. Paradise Fields is mostly to be open land and contains a Wildlife Site: most of the open land will be retained as open space.
Delivering East Hemel: 20.14-19	MC75	20.15 Planning East Hemel Hempstead is complex because of the range of issues. These include the size and character of the Maylands Business Park, both now and in the future, and also the range of facilities, transport and additional housing and services that help to support this businesses neighbourhood and the wider town. The area's location on the edge of the town, bordering the countryside, adds to the complexity. Close liaison is required between Dacorum Borough Council and St Albans City and District Council to ensure that the Maylands Business Park is allowed to grow and fulfil its potential as a premier business location in Hertfordshire and the wider region. For these reasons, East Hemel Hempstead will be the subject of a separate Area Action Plan (AAP), progressed jointly by the two Councils. The boundary of the Area Action Plan is shown on the Proposals Map for Dacorum. However, its easterly extent will be determined by St Albans Council through collaboration. It is indicated in Figure 22 as an area within which certain issues arising in Dacorum can be addressed (see below).
	MC76	New paragraph after 20.18 The North East Relief Road, park and ride, lorry parking and other proposals will be designed to accommodate and manage necessary traffic

Core Strategy Reference	Amendment Reference	Amendment
		demands and their effects. The eastern side of Hemel Hempstead has been the subject of speculation for major growth. Past considerations
		have highlighted the need to think long term about the strategic road network and not to pre-empt future road layout and junctions,
		particularly as they affect Junction 8 of the M1. The potential impact on the strategic road network will therefore be carefully assessed.
Figure 18	MC77	Maylands Gateway - adjoins Breakspear Way, a primary route and green gateway into Maylands Business Park, and the town itself. This includes greenfield and some brownfield land, together with existing businesses.
		The area to the north of Breakspear Way offers opportunities to provide an additional access road into Maylands Business Park, deliver prestigious landmark buildings at key nodes and enhance open space. The types of uses suited to this area will be primarily HQ offices, conference facilities and a hotel. There may also be opportunities for other development that accords with its high-status and green character. such as a green energy centre, and a park and ride facility, along There are with opportunities for decentralised heating systems or combined heat and power (CHP). Development must be designed to integrate with and enhance the open land.
		Maylands Gateway offers around 29.7ha of developable land. This will deliver a large proportion of the Borough's employment needs over the plan period. (This excludes the as yet undeveloped People Building phases).
		Woodland and open space to the south of Breakspear Way will be retained.
Policy CS33	-	
Policy CS34	-	
Monitoring/Delivery	-	
Proposal LA1	-	
Proposal LA2	-	
Proposal LA3	-	
Figure 19: vision - built	MC78	See Figure. Show same town centre boundary as for Figure 21.
Figure 20: vision - natural	MC79	See Figure. Identify Shrubhill Common Local Nature reserve and the full extent of the Regionally Important Geological Site at Boxmoor. Also, show open land at Paradise Fields, Hemel Hempstead Town Centre. Show same town centre boundary as for Figure 21.
	E46	See Figure with MC79. Remove Movement Gateways from the key and Figure.
Figure 21: the town centre	MC80	See Figure. Exclude Paradise Fields from the town centre.
	E47	See Figure with MC80. Extend the Gade Zone southwards to include the Market Square.
Figure 22: East Hemel	MC81	See Figure. Amend the notation for the boundary of the Area Action Plan and key: at this stage the boundary is indicative within St Albans District.
	E48	Remove the following references from the key – Possible Employment Expansion; Land to the East of Boundary Way
21. Berkhamsted		
Context: 21.1	-	
The Vision	-	
Local Objectives	-	
Delivering the Vision: 21.2-14	MC82	21.6 New development must <u>respect and maintain</u> the distinctive physical and historic character of the town and its valley setting, <u>including</u> the landscape setting of the castle. It and will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations. The green swathe between the town and the A41 will be maintained. Views across the valley and along the valley floor will be
		safeguarded. A cautious approach will be taken to flood risk for development close to the canal embankment and any proposals will be
		subject to a flood risk assessment, and any necessary mitigation measures.
	MC83	21.12 The castle is an important landmark <u>and significant historical asset</u> , whose position and heritage will be protected. Visitors will be encouraged to make use of public transport access.
Strategic Site SS1	MC84	Principles
		 To provide a mix of two storey housing including around 40% affordable homes, and informal open space. A contribution must be made towards educational and community facilities.
		• The development is in a sensitive ridge top and edge of town location, adjacent to existing housing. The layout, design, density and
		landscaping must therefore safeguard the amenities of nearby housing and create a soft edge with the proposed leisure space and

Core Strategy Reference	Amendment Reference	Amendment
		 adjoining countryside. The impact of the scheme on the local road network must will need to be mitigated through promoting by supporting sustainable transport options, reinforcing providing pedestrian/cycle links through the site and funding improvements to appropriate junctions nearby, in particular the Shootersway/Kingshill Way and Durrants Lane/ High Street junctions. The main access is to will be taken from Shootersway, with a secondary access possible from Durrants Lane. The impact of school traffic must be tackled by providing new drop off facilities for pupils and through preparing and submitting implementing a Green Travel Plan. Grim's Ditch will be retained as a is an important archaeological feature of the site. An archaeological assessment must set out measures to mitigate the impact of the development on it and consider the need to preserve remains in situ. The development must be planned to enable secure funds for the refurbishment of the school on its existing site. The scheme must secure additional areas of informal and formal leisure space and ensure their long term management. All formal leisure space should be made available for public use.
	MC85	 Delivery (bullet points 1 – 3) A comprehensive planning framework is needed to link the three main land uses and their timing i.e. housing, school with playing fields and new leisure space. Development will be programmed in order to enable the completion of 180 homes and other uses by 2014/15 The priority is to deliver the school playing fields first, i.e. before the refurbishment of the school. Housing will be phased to allow the playing fields to be relocated first, this to be delivered and to generate funds for refurbishment of the school.
	E49	 Delivery (bullet points 4 – 7) The Masterplan provides A master plan will provide a detailed planning framework, sufficient to take forward the scheme forward through to a planning application. The planning application will be processed progressed under a Planning Performance Agreement. Joint working with the landowners will ensure delivery of the scheme, secure necessary developer contributions and ensure that long term management of all open spaces, including Cox Dell and The Plantation, is in place. The Council will work with Hertfordshire County Council to identify the level and type of contributions required towards sustainable transport measures, local highway works and additional educational and community facilities.
Proposal LA4	MC86	 Principles A mix of two storey housing including around 40% affordable homes. A contribution must be made towards educational and community facilities. The layout, design, density and landscaping must create a soft edge with the adjoining countryside and secure a long term Green Belt boundary. Development must respect the setting of the adjoining British Film Institute site. The impact on the local road network will be mitigated through the promotion of by supporting sustainable transport options measures and funding improvements to the Shootersway / Kingshill Way junction. This will include securing additional land to improve the junction within the existing boundary. The main access taken from Shootersway. Access to the rear of Hanburys to be considered to allow for allotments and other possible uses.
Vision Diagram (Fig 23)	E50	See Figure. Correct the position of the two movement gateways (positioning them further east). Correct the centre zone to include the area of the railway station (and nothing else north of the railway line).
22. Tring		
Context: 22.1-2	-	
The Vision	MC87	Tring remains a successful compact market town, surrounded by farmland and delivering a high quality of life and prosperity for its residents and business community. Its built and natural heritage has been retained and enhanced. Accessibility to services and facilities has been improved, whilst promoting sustainable forms of travel.
		This has been achieved by delivering a greater range of high quality housing to suit long-term local needs that integrates with the character of the town. Small-scale business activity is encouraged and advantage taken of tourist attractions, such as the Zoological Museum, the town's green hinterland and Tring Reservoirs. Additional social facilities have also been sought for the young and elderly, with improved outdoor

Core Strategy Reference	Amendment Reference	Amendment
		leisure facilities.
Local Objectives	MC88	Provide around 480 new homes between 2006 and 2031.
		 Provide new open space as part of development of the local allocation (Icknield Way, west of Tring).
		 Accommodate the expansion of Extend Tring School by up to 2 forms of entry and deliver new detached playing fields.
		Safeguard unique uses, such as the Zoological Museum and the auction rooms.
		Maintain the current level of employment provision.
Delivering the Vision: 22.3-9	MC89	22.3 Tring will deliver around 480 new homes. This includes approximately 150 homes through a local allocation on the western edge of the town, together with affordable housing and new open space, including playing fields.
	MC90	22.4 As a result of Hertfordshire County Council's assessment of school places in the borough, Facilities for Tring Secondary School will need
		to be extended, probably by up to 2 forms of entry and with additional, new-detached playing fields provided. The location of these new playing fields will be identified through the Site Allocations DPD: dual use will be sought.
	MC91	New paragraph after 22.4
	IVICOT	An active sporting community wants to promote indoor and outdoor sport. Investment, which helps to maintain facilities, provides
		appropriate new space and benefits the town, will be supported.
	MC92	22.5 New development will maintain the distinctive compact nature of this market town, particularly the historic High Street and 'Tring
	IVICOZ	Triangle', and its countryside setting, supporting the maintenance of viable farmland and protecting landscape features, such as Tring Park
		and Tring Reservoirs. Views along the High Street and from Icknield Way will be safeguarded.
Proposal LA5	MC93	Principles
		A mix of two storey housing, including around 40% affordable homes.
		A contribution must be made towards educational and community facilities (i.e. both buildings and space).
		• The layout, design, density and landscaping must create a soft edge <u>and transition</u> with the Area of Outstanding Natural Beauty and
		secure a strong defensible long term Green Belt boundary
		• Impact on the local road network mitigated through the promotion of sustainable travel options, including pedestrian links onto Highfield Road.
Vision Diagram (Fig 24)	-	
23. Kings Langley		
Context: 23.1	-	
The Vision	-	
Local Objectives	-	
Delivering the Vision: 23.2-6	-	
Vision Diagram (Fig 25)	-	
24. Bovingdon		
Context: 24.1	-	
The Vision	_	
Local Objectives	MC94	Provide around 130 new homes between 2006 and 2031.
Loodi Objectivos		Seek to provide a residential care home
		Provide new open space as part of development of the local allocation (Chesham Road / Molyneux Avenue).
		 Safeguard the unique employment uses, such as Bovingdon Brickworks and HMP The Mount.
Delivering the Vision: 24.2-5	-	Resolve parking issues along the High Street.
Proposal LA6	-	
Vision Diagram (Fig 26)	-	
25. Markyate		
Context: 25.1-4	-	
The Vision	-	
Local Objectives		
Lucai Objectives	_	

Core Strategy Reference	Amendment Reference	Amendment
Delivering the Vision: 25.5-10	-	
Strategic Site SS2	MC95	Delivery
		Development will be programmed in order to enable the completion of 90 homes and other uses by 2013/14.
		• The master plan provides a detailed planning framework sufficient to take forward the scheme through to a planning application in 2011/12.
		The planning application will be processed under a Planning Performance Agreement.
		A phasing plan will demonstrate how the development will be delivered.
		 Joint working with the landowners will ensure delivery of the scheme and secure necessary developer contributions.
		• The Council will work with Hertfordshire County Council to identify the level and type of contributions required towards sustainable
		transport measures, local highway works and additional educational and community facilities.
		The Council will work closely with the Primary Care Trust and landowner in delivering a new health facility.
		• The Council developer will liaise with the Environment Agency to ensure flooding, deculverting and the relevant drainage issues are addressed.
Vision Diagram (Fig 27)	MC96	See Figure. Extend the centre zone into the site so as to include the doctors' surgery and small shops.
26. Countryside	Wiede	See 118 and Externa the centre 2011c into the site 30 as to include the doctors surgery and small shops.
Context: 26.1-3	-	
The Vision	_	
Local Objectives	_	
Delivering the Vision: 26.4-18	MC97	26.11 The potential for 'sustainable tourism' in the Chilterns is recognised and appropriate schemes that support this will be supported. A
Delivering the vision: 26.4-18	WiGO7	range of visitor accommodation is already available including hotels and bed and breakfast accommodation. The Grand Union Canal is an important historic, environmental and leisure asset. A number of boating facilities are available in the area and additional mooring basins will not be supported in open countryside.
	MC98	New paragraph after 26.14
		The countryside has been subject to human activity from prehistory to modern times. There are numerous areas with existing or high
		potential for heritage assets. Some are of national importance and require particular protection. All heritage assets affected by development
		should be subject to assessment and appropriate mitigation measures. Some rural practices, such as bio-fuel production and forestry, can
		damage archaeological features and their impact may therefore merit careful consideration.
	MC99	26.15 Horse riding is a popular activity, and improvements to the bridleway network will be sought. The impact of equine activities on the
		landscape <u>can be a problem and it</u> will be mitigated in sensitive areas, especially the Chilterns Area of Outstanding Natural Beauty. The Chilterns Conservation Board provides good practice advice.
	MC100	26.18 The tranquillity of the countryside will be recognised and protected. The impact of noise, light and visual intrusion from the transport routes in terms of noise, and light and visual intrusion will be reduced through additional landscaping. Existing light pollution will be
		managed and not worsened through new development. Proposals to change aircraft routes, resulting in more traffic flying over the Chilterns
		at lower levels, will be opposed.
Table 12	-	
Vision Diagram (Fig 28)	MC101	See Figure. Add countryside RIGGs, Icknield Way regional path and the missing countryside nature reserve – Millhoppers
Part C – Implementation and Delivery		
Strategic Objectives	-	
27. Delivery		
Text: 27.1-4	-	
Partnership Working: 27.5-8	-	
Key Projects: 27.9-10	-	
Flexibility & contingency: 27.11-14	-	
28. Infrastructure		
Text: 28.1-2	-	
Infrastructure requirements: 28.3-6	-	

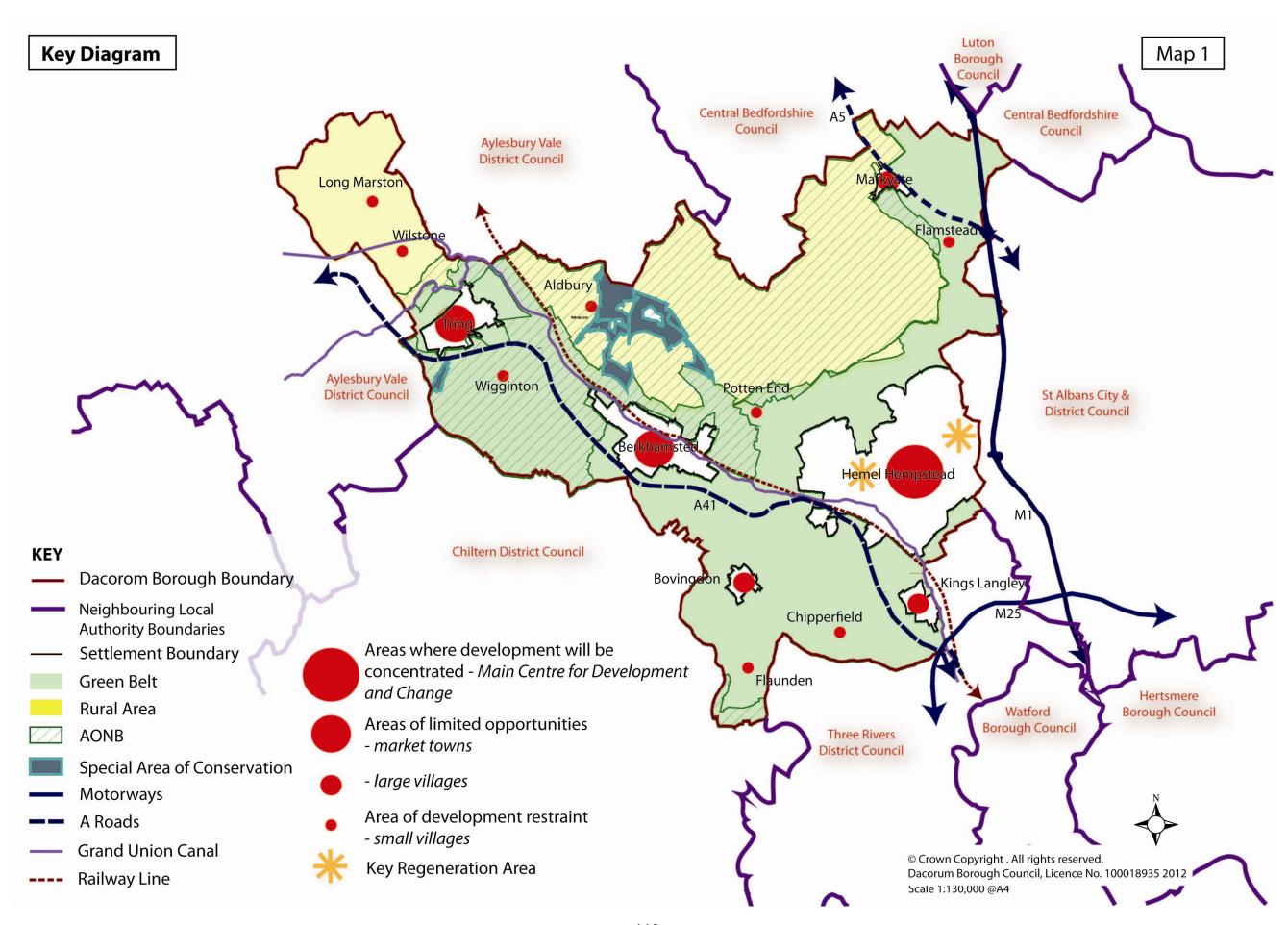
Core Strategy Reference	Amendment Reference	Amendment
Developer contributions: 28.7-11	-	
Policy CS35	-	
Monitoring/Delivery	-	
29. Monitoring		
Text	-	
Part D - Appendices		
1. Superseded Policies	-	
Housing Trajectory	_	
3. Delivery Mechanisms		
4. Glossary	E51	Affordable Housing
4. Glossary		Affordable housing includes social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. The term does not include low cost open market housing. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. - Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices. - Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision'.
	MC102	(PPS3: Housing 2006) (National Planning Policy Framework, March 2012) Appropriate Assessment (also referred to as Habitats Regulations Assessment)
	1110102	This assessment is required under The Conservation of Habitats and Species Regulations 2010. Its purpose is to analyse a plan or proposals
		and ascertain whether there would be any significant effects on internationally important nature conservation sites (also referred to as Natura or European sites).
	E52	Annual Monitoring Report (AMR) Monitors the Local Development Framework local planning framework and its key policies and proposals. Information in this document will show trends and highlight possible problem areas which future changes to planning policy will seek to address.
	MC103	Area of Outstanding Natural Beauty (AONB) Dacorum borough includes part of the Chilterns AONB. This is a precious landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard it. The AONB is managed by the Chilterns Conservation Board. The Board was set up by a Parliamentary Order under the Countryside and Rights of Way Act 2000. Its primary purpose is to conserve and enhance the natural beauty of the AONB. However it does have other purposes – i.e. to increase the public's understanding and enjoyment of the AONB and to foster the economic and social well-being of communities within the AONB. The Council must also have regard to the primary purpose of conserving and enhancing the natural beauty in exercising its functions.
	E53	Dacorum Borough Local Plan (DBLP) This current adopted is the Local Plan for Dacorum Borough used to determine planning applications which was adopted by the Council on 21 April 2004. Its policies will gradually be replaced by the local planning framework. Until that happens the Council will use the policies to help it determine planning applications. Only some of the policies have been saved for use. The DBLP will be replaced gradually by the Local Development Framework.
	E54	Department for Communities and Local Government (DCLG) The department with responsibility for planning and local government. It replaced the former Office of the Deputy Prime Minister in May 2006.
	E55	Development Plan Document (DPD) A collective term for the adopted local plan and neighbourhood plans (referred to in Dacorum as the local planning framework); it also includes the regional spatial strategy (until this is revoked). The local plan is a plan for the future development of Dacorum. For neighbourhood plan, see below. the statutory development plan parts of the Local Development Framework, including the core strategy, allocated sites, and general policies documents.
	E56	Green Infrastructure (GI) Green Infrastructure is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of

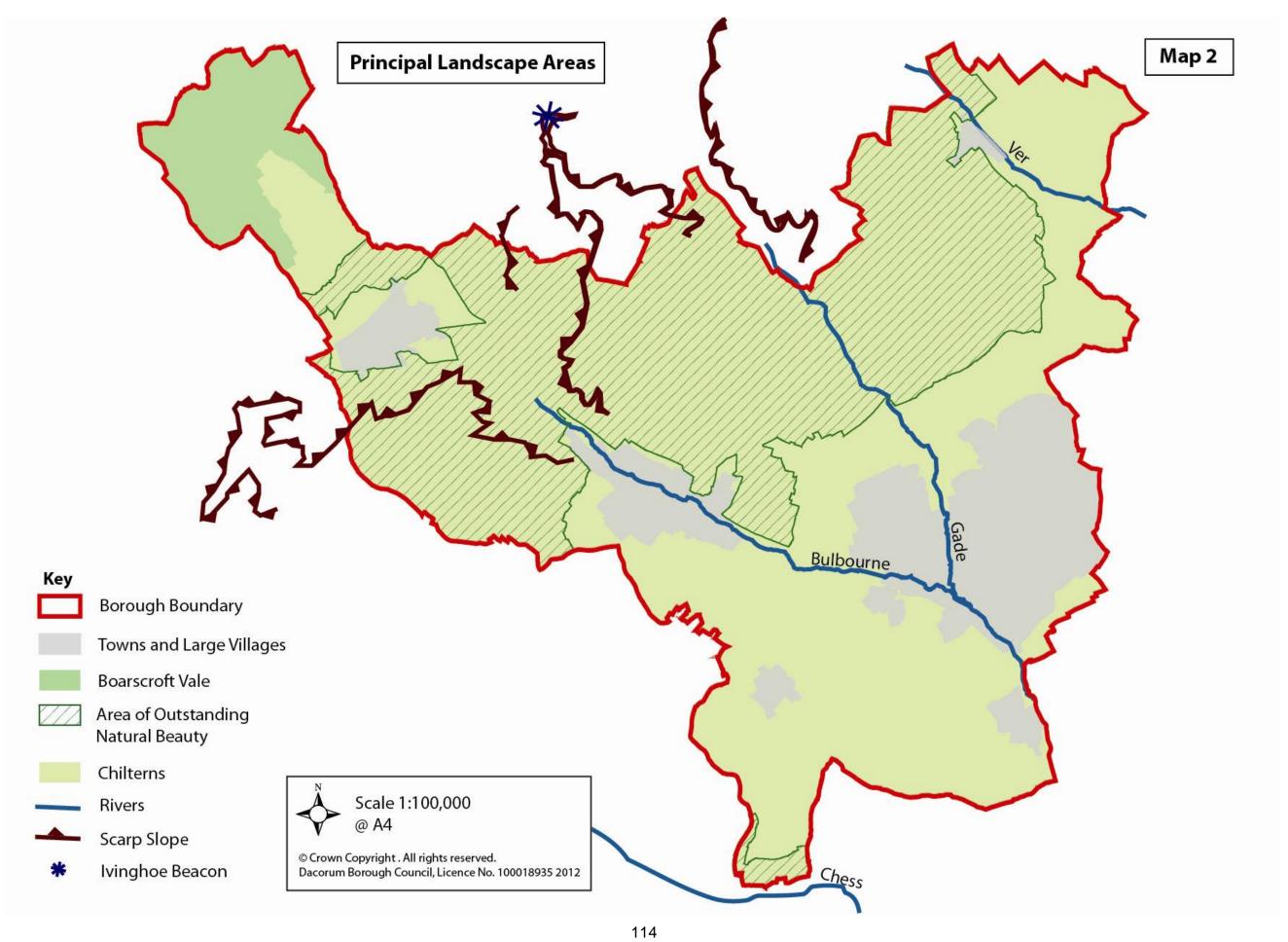
Core Strategy Reference	Amendment Reference	Amendment
		environmental and quality of life benefits. both new and existing, both rural and urban, which supports the natural and ecological processes
		and is integral to the health and quality of life of sustainable communities. (Government Guidance, PPS12, Local Development Frameworks)
		(National Planning Policy Framework, March 2012)
	E57	Gypsies and Travellers
		Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or
		dependants' educational or health needs or old age have ceased to travel temporarily or permanently. The definition excludes travelling
		showpeople. A pitch is the space occupied by one family or household: it may accommodate one or more caravans. (Planning Policy for
		<u>Traveller Sites March 2012</u> Planning for Gypsy and Traveller Caravan Sites - ODPM Circular 01/2006)
		A pitch is the space occupied by one family or household: it may accommodate one or more caravans.
	MC104	Heritage assets
		This is a general term for all the valued components of the historic environment – buildings, monuments, sites, places and landscape – which
		merit particular consideration in planning decisions. Some are designated nationally or through national legislation – e.g. scheduled ancient
		monuments and listed buildings, conservation areas. Others are identified by the Council or County Council through normal decision making
		or plans – e.g. buildings of local importance, areas of archaeological importance.
	E58	Local Development Document (LDD)
		A collective term for any documents that make up the Local Development Framework. This includes development plan documents and
		supplementary planning documents.
	E59	Local Development Planning Framework (LDF)
		An umbrella term for all documents which make up the new local planning policy context.
	E60	Local Development Scheme (LDS)
		The detailed timetable and project plan showing all documents that are to be produced to make up the Local Development Framework.
	E61	Local Strategic Partnership (LSP)
		The Dacorum LSP is a partnership comprising representatives from of public and private organisations, business and the voluntary sector and
		community groups. One of its roles main tasks is to prepare and implement the Sustainable Community Strategy.
	E62	National Planning Policy Framework (NPPF)
		The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied.
		The guidance is to be used by local planning authorities in drawing up plans and determining planning applications.
	E63	Neighbourhood Plan
		Neighbourhood Plans deal with local land use and development issues, rather than strategic issues. They may relate to regeneration or
		growth. They may cover where new shops, offices or homes should go and what green space should be protected. Plans should be
		compatible with national policies and policies in the local authority's <u>adopted</u> development plan.
	E64	Planning Policy Guidance (PPG)
		A series of documents setting out the Government's national policy and advice on planning issues such as housing, transport, conservation
		etc.
	E65	Planning Policy Statement (PPS)
	140405	Guidance documents that replace PPGs.
	MC105	Site of Special Scientific interest (SSSI)
		SSSIs are designated by English Nature under the Wildlife and Countryside Act 1981 (as amended). They comprise land, which is important
	140400	nationally for its flora, fauna or geology.
	MC106	Special Area of Conservation (SAC)
		SACs are designated under the European Union's Habitats Directive. They are of especial European importance and should be protected for
	Ess	their wildlife and habitat value.
	E66	Supplementary Planning Document (SPD)
		SPDs provide more detailed planning guidance to supplement what is in the development plan. documents. These They are part of the local
	E67	planning framework. LDF.
	E0/	Travelling Showpeople Members of the agreement arganized for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This
		Members of the <u>a</u> group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This

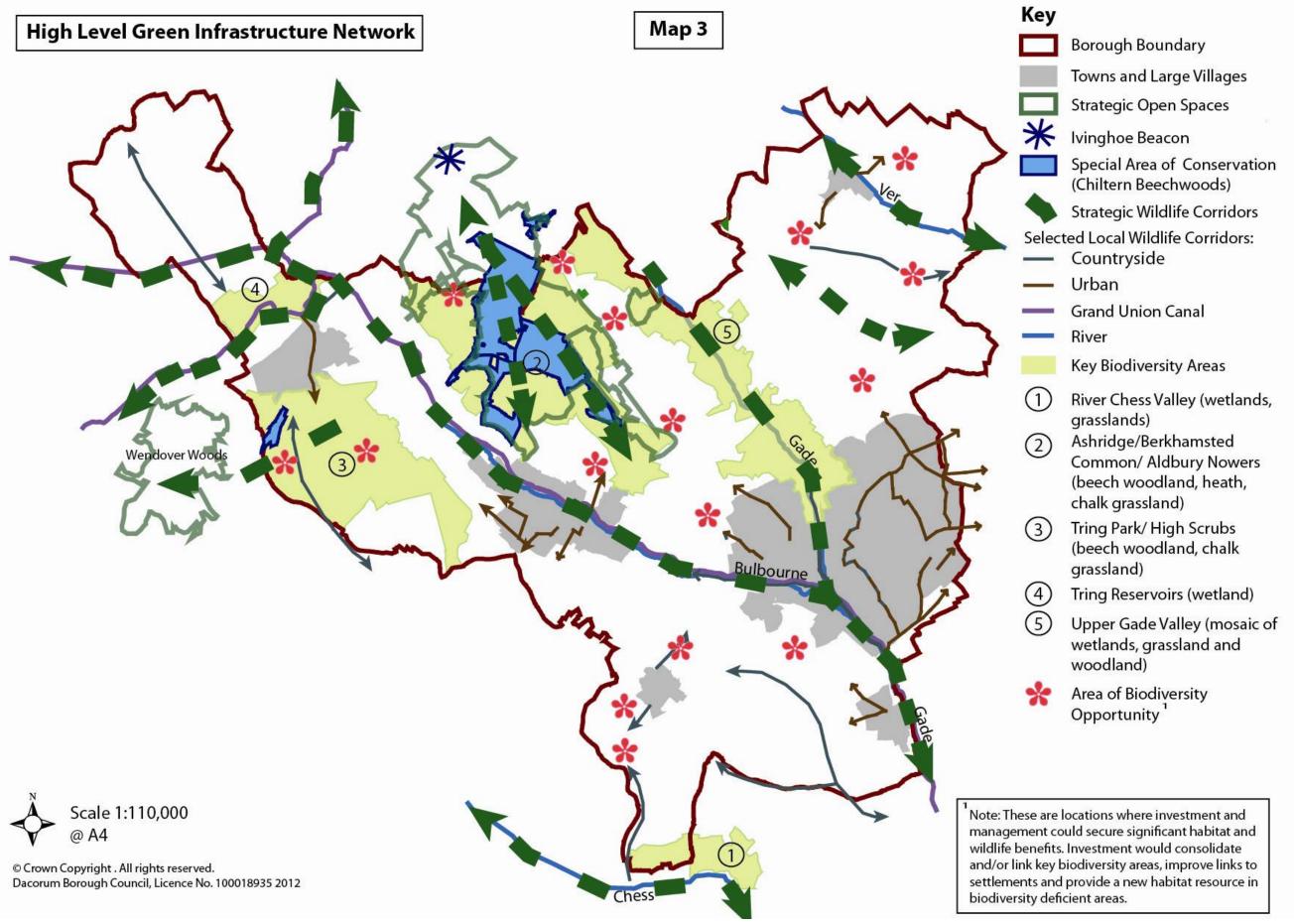
Core Strategy Reference	Amendment Reference	Amendment	
		includes such persons who on the grounds of their own or their family's or dependents' more localised pattern of trading, educational or	
		health needs or old age have ceased to travel temporarily or permanently. It excludes Gypsies and Travellers as defined above. A plot mea	
		a pitch for travelling showpeople. A plot may need to incorporate space for the storage and maintenance of equipment. A pitch can	
		defined as the area of land for which a site licence is paid. (Planning Policy for Traveller Sites; March 2012 for Travelling Showpeople - CLG	
		Circular 04/2007)	
		A plot means a pitch for travelling showpeople. A plot may need to incorporate space for the storage and maintenance of equipment. A	
		pitch can be defined as the area of land for which a site licence is paid.	
	MC107	Wildlife Sites Wildlife Sites are the most important places for wildlife outside legally protected land such as Nature Reserves or Sites of Special Scientific Interest. There are almost 2,000 Wildlife Sites in Hertfordshire, totalling 17,215ha, and covering over 10% of the county. 246 of these sites are in the Dacorum District, covering 3,131.5ha. They include meadows, ponds, woodland and urban green space. This county-based system is now acknowledged and promoted nationally by DEFRA and applied across England. The Wildlife Sites Partnership in Hertfordshire includes HMWT, HBRC, Natural England, the Countryside Management Service, Chilterns AONB, FWAG and the Environment Agency, and is led and coordinated by HMWT. Windfalls Sites that come forward for development after receiving planning permission, but have not been formally identified as having development potential within the Strategic Housing Land Availability Assessment. Sites of fewer than 5 units 4 or more units are always considered as	
		windfall. windfalls.	
Proposals Map			
General (including omissions)	-		
Hemel Hempstead Town Centre	MC108	See Figure. Amend boundary to exclude Paradise Fields.	
East Hemel Hempstead	-		
SS1: Shootersway	-		
SS2: Hicks Road	-		
Conservation Areas	-		
Trunk Roads	-		

❖ Figures illustrating Changes to Maps and Diagrams

- Map 1: Key Diagram
- Map 2: Principal Landscape Areas
- Map 3: High Level Green Infrastructure
- Map 4: Opportunities for Renewable Energy
- Figure 2: Core Strategy Preparation Stages
- Figure 15: Biodiversity and Geology Designations
- Figure 20: Hemel Hempstead Vision Diagram: Natural
- Figure 21: Hemel Hempstead Town Centre Vision Diagram
- Figure 22: East Hemel Hempstead area Action Plan Vision Diagram
- Figure 23: Berkhamsted Vision Diagram
- Figure 27: Markyate Vision Diagram
- Figure 28: Countryside Vision Diagram
- Proposals Map Hemel Hempstead Town Centre







Map 4: Opportunities for Renewable Energy KEY Oportunities for: Wind Turbines
 (because of prevailing wind conditions) 2. District Heating (because of heat demand and density/scale of development) a) within existing urban areas b) at local allocations Source: Hertfordshire Climate Change and Planning Study 2010 - AECOM Scale 1:110000 @ A4 © Crown Copyright . All rights reserved. Dacorum Borough Council, Licence No. 100018935 2012

Figure 2

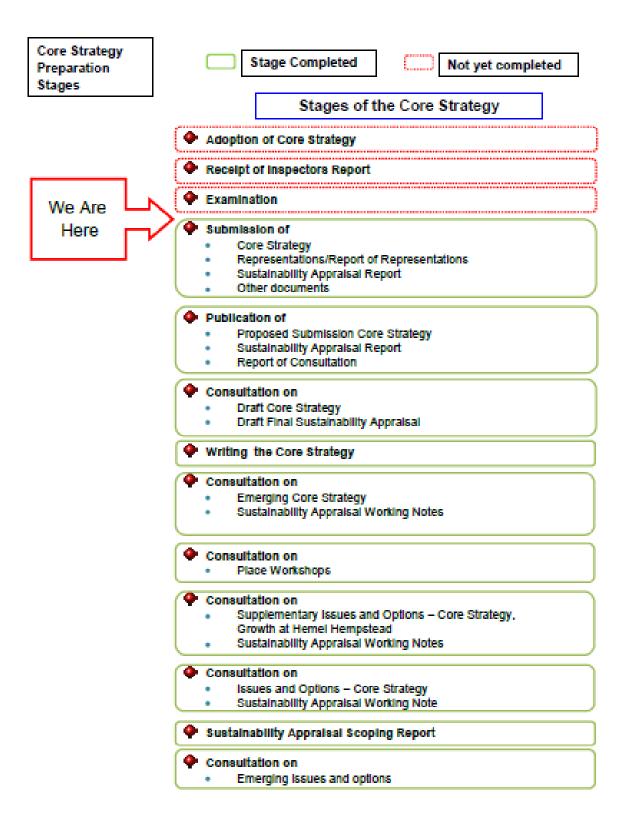
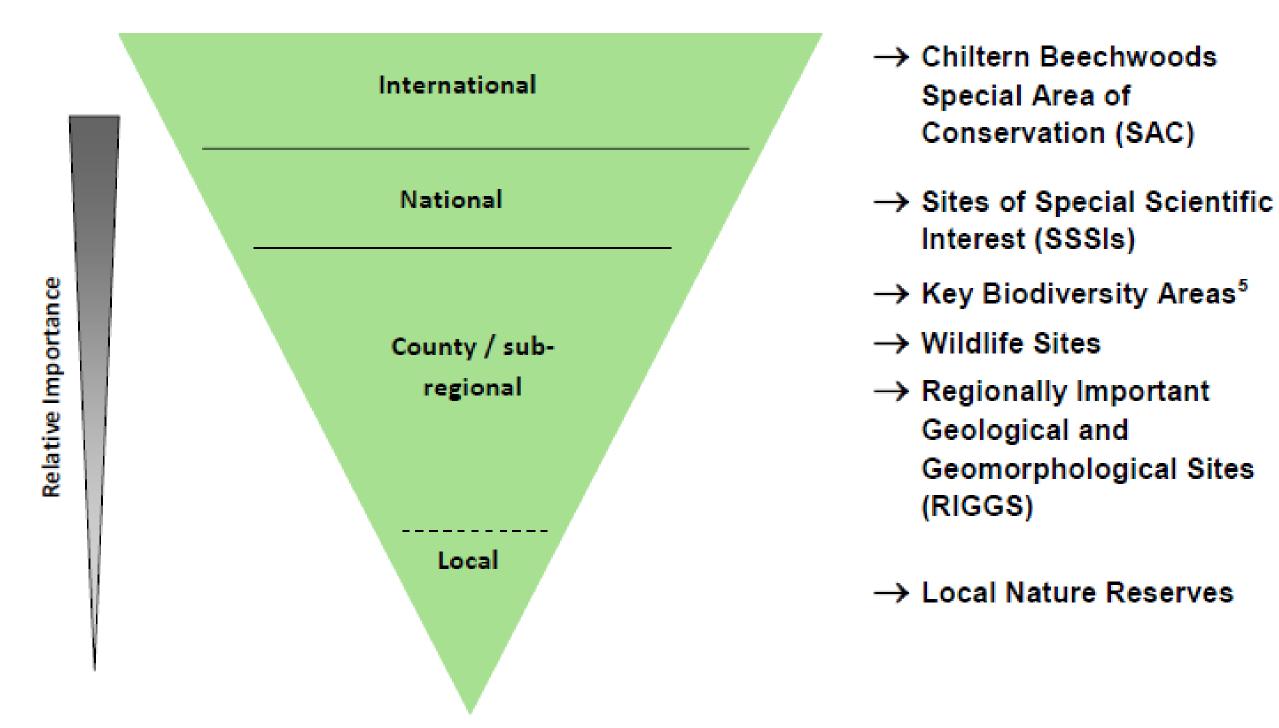
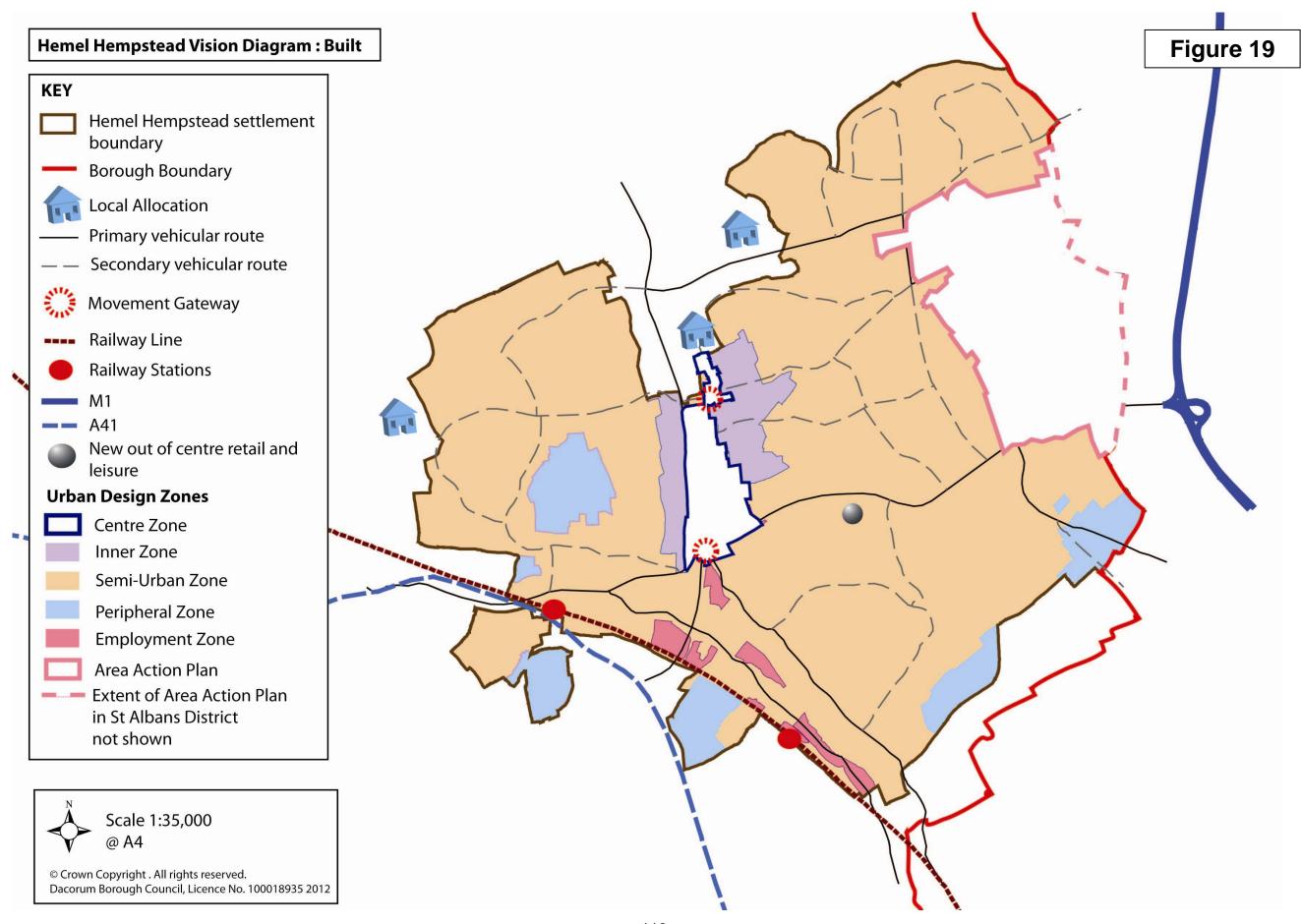
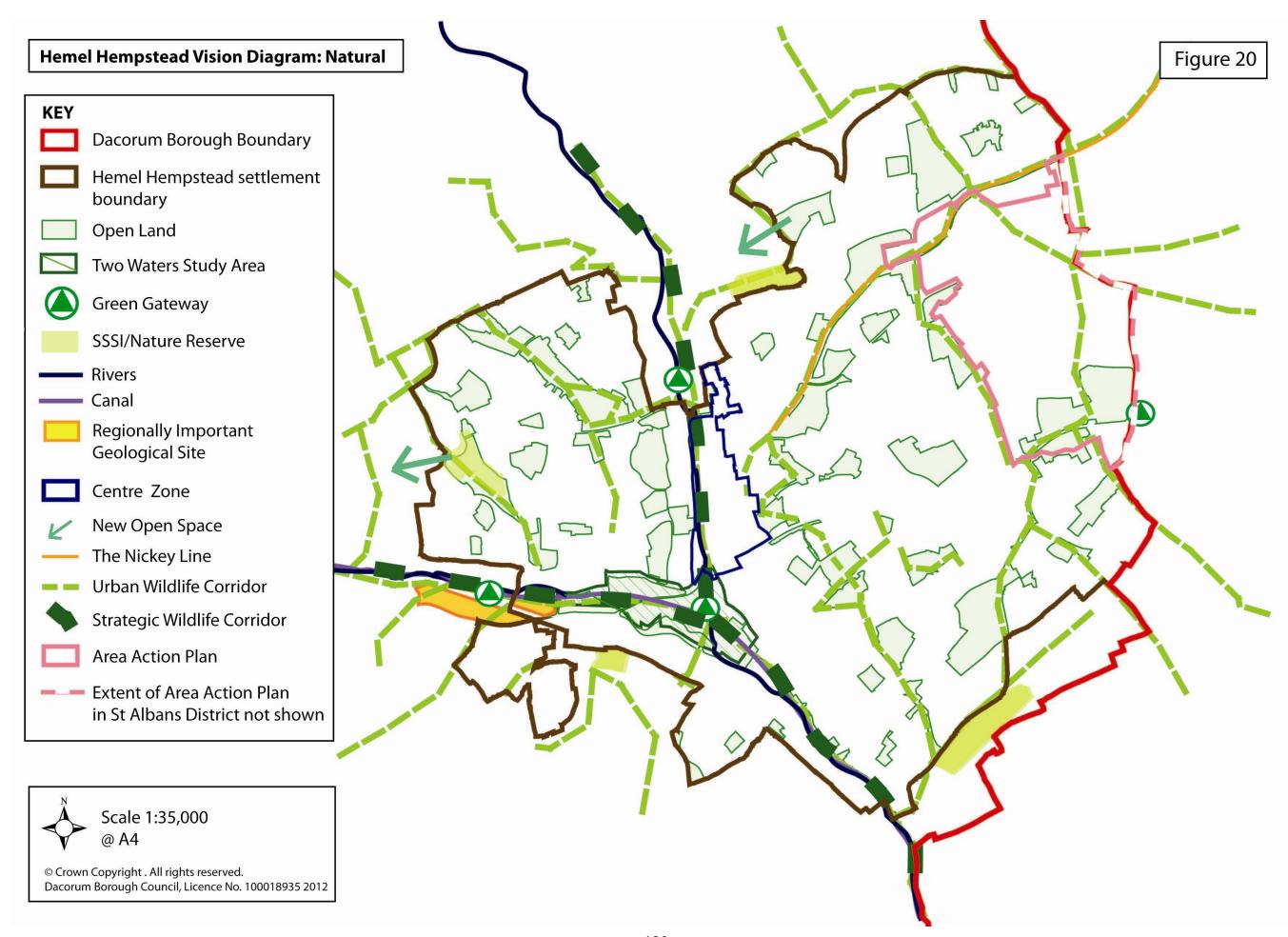
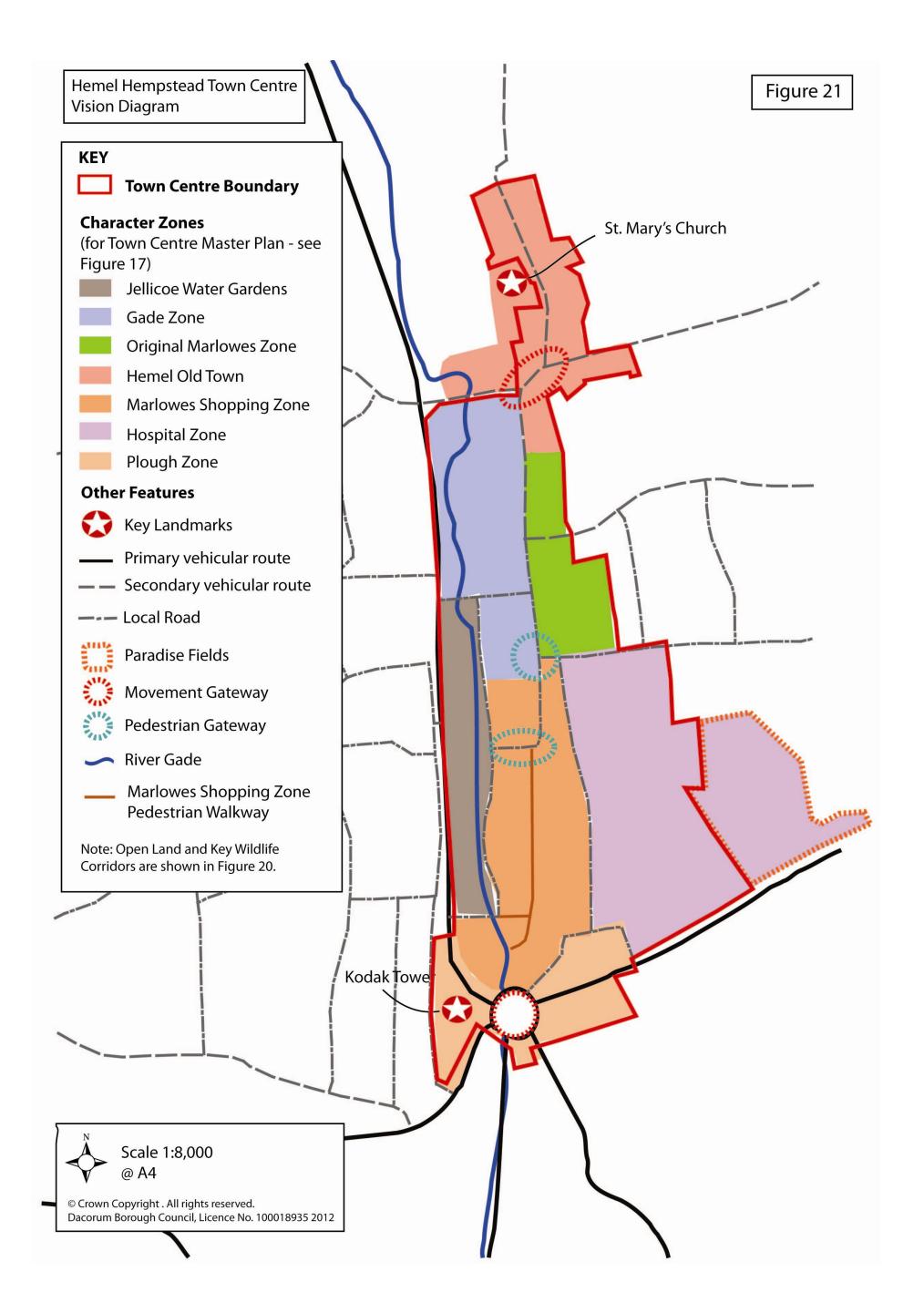


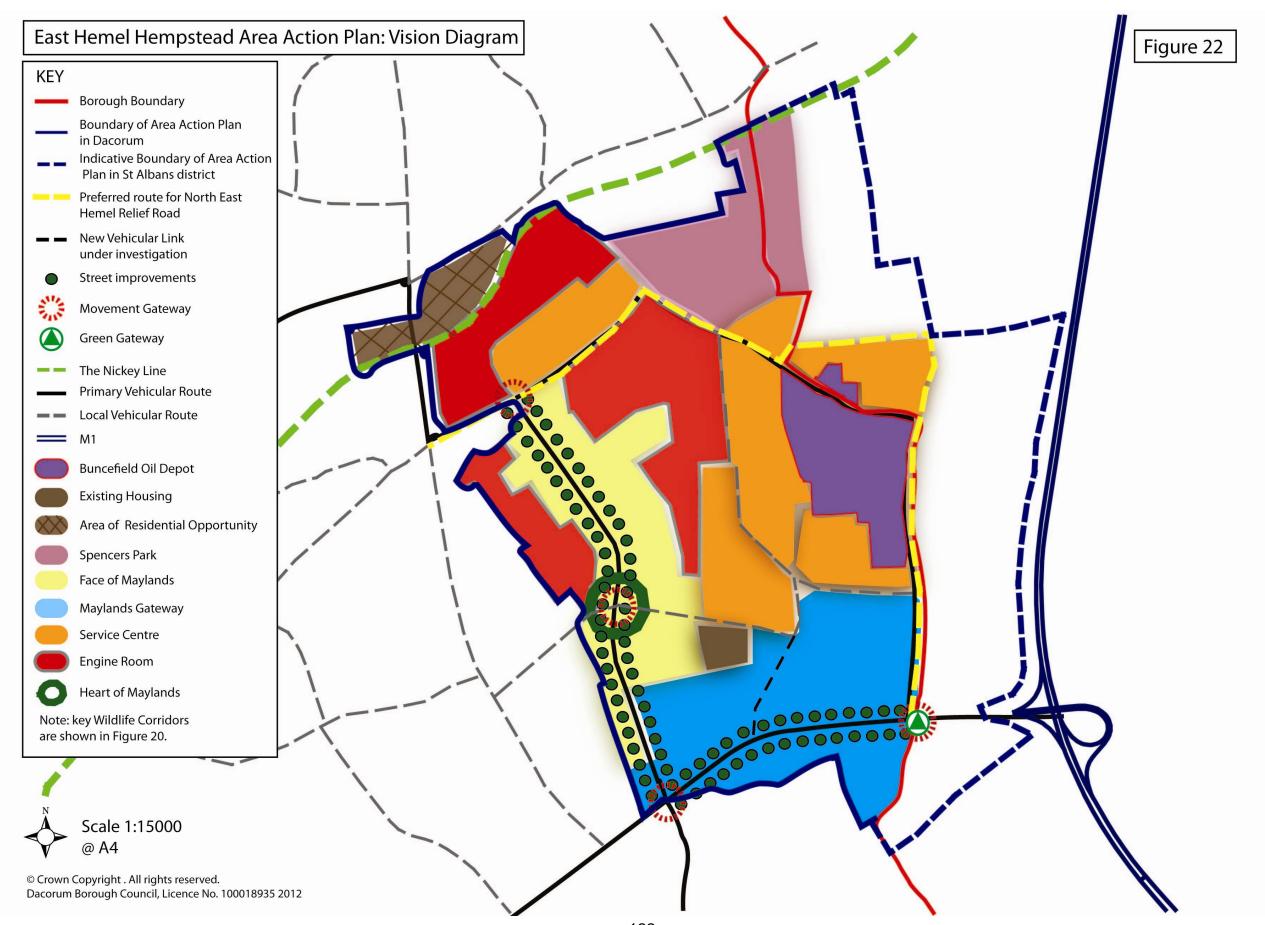
Figure 15: Biodiversity and Geology Designations

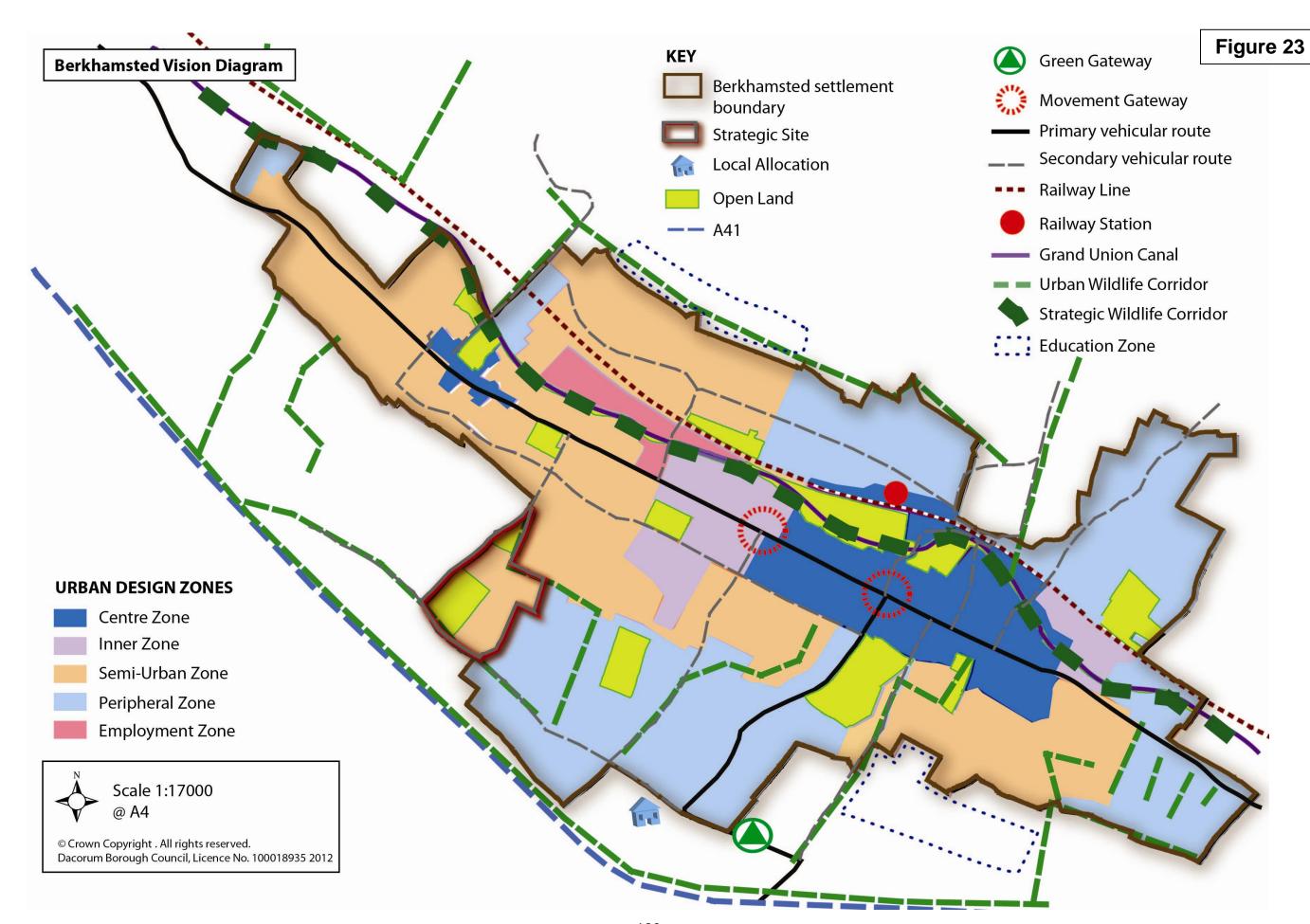




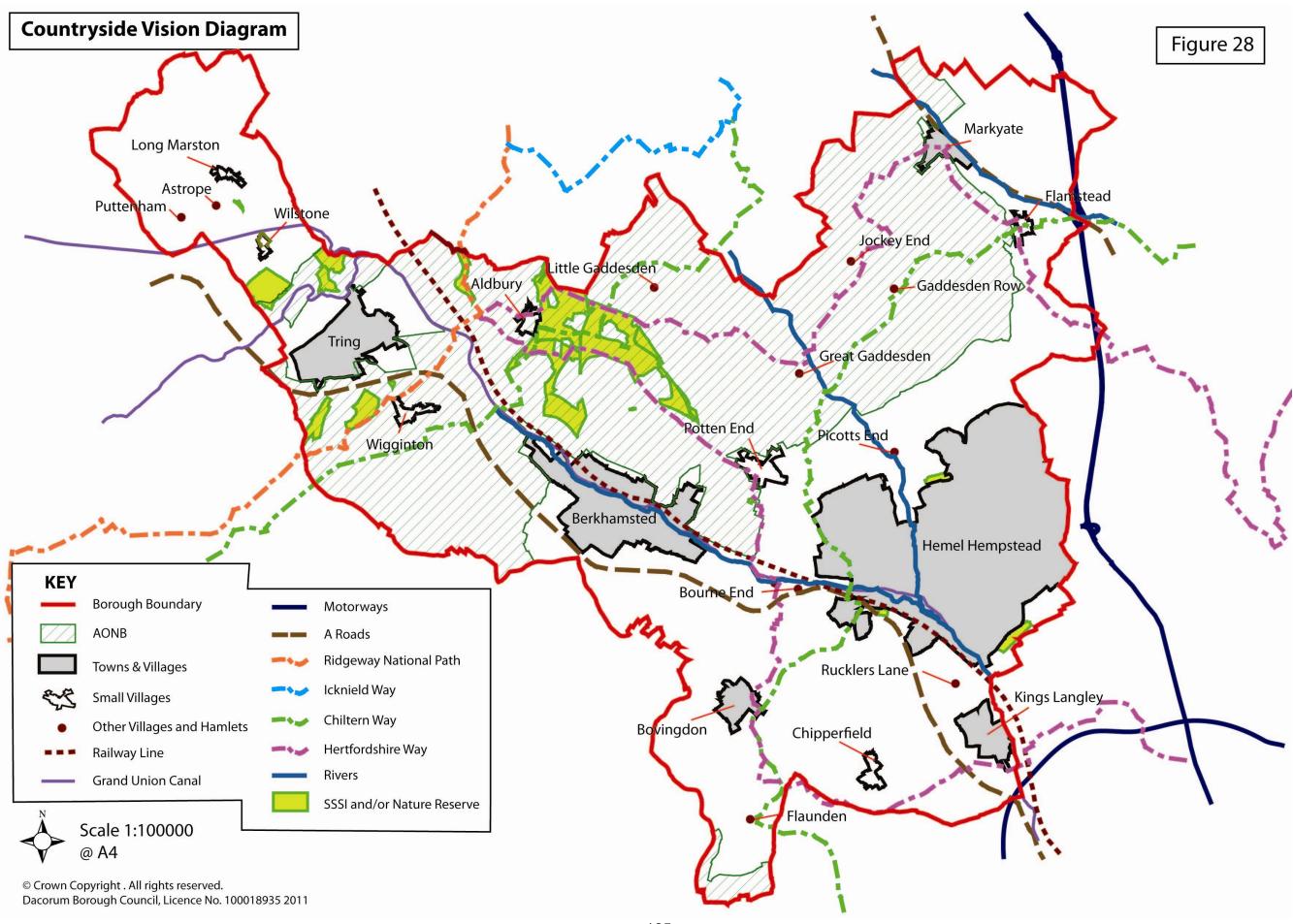












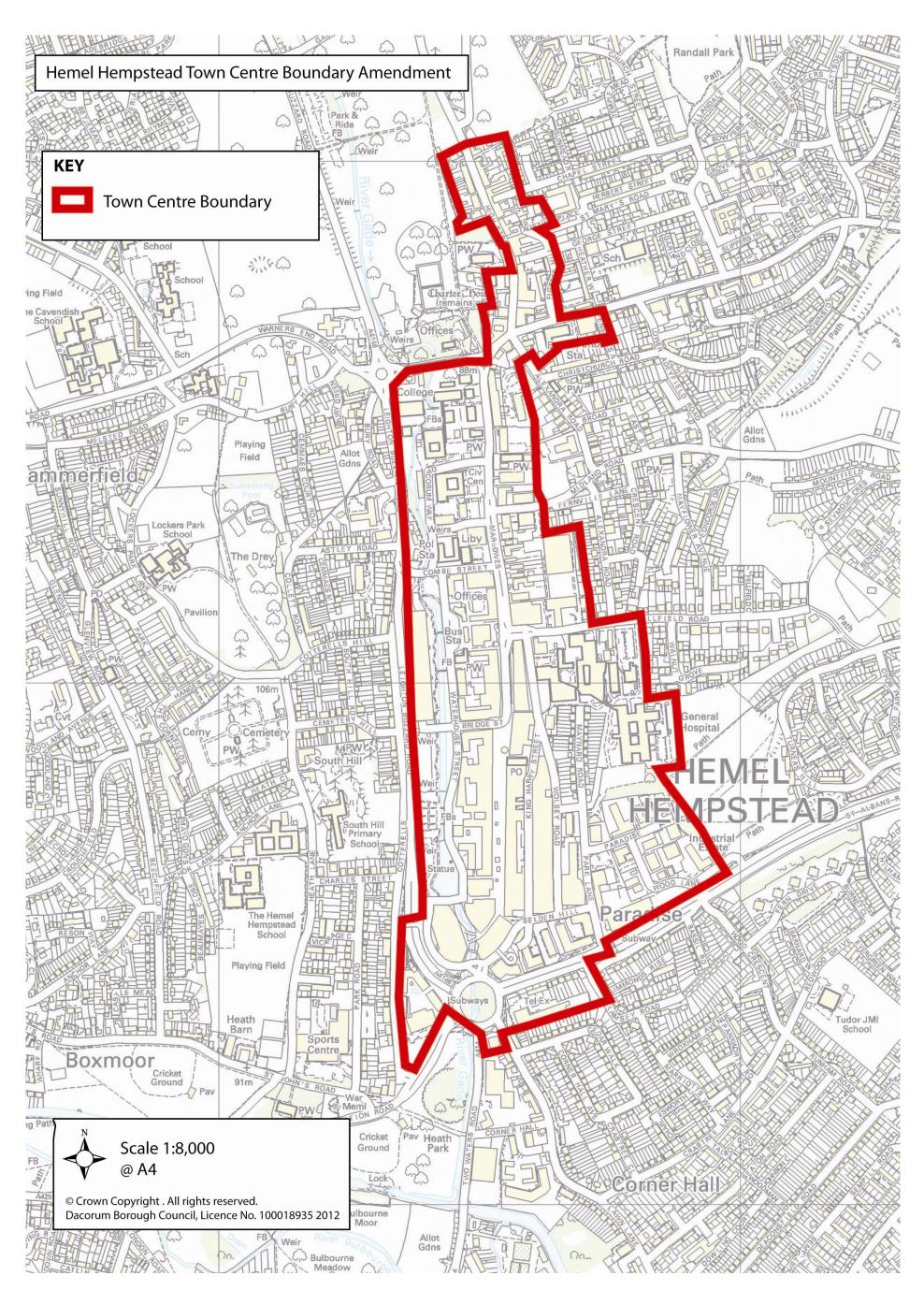


Table 4 – Responses not considered in the Report of Representations

- 4.1 List of Late Representations
- 4.2 List of those making No Comment
- 4.3 List of those making Comments on the Sustainability Appraisal, Strategic Environmental Assessment and/or Appropriate Assessment

4.1 List of Late Representations

❖ Main Consultation

Name	Nature of Comment	Council Response
Pritich Waterways	Cupport whole of the	Cuppert noted
British Waterways Markyate Parish Council	Support whole of the Core Strategy	Support noted.
Wai kyate Falish Council	Core Strategy	
British Pipeline Agency	Infrastructure should be given the highest protection. A precautionary approach should be taken to the planning of development within the vicinity of BPA managed pipelines.	It is normal practice to ensure development gives appropriate clearance. BPA are consulted on relevant applications. Their letter has been passed to the Council's Development Management section, as they also requested.
Annette Harrison	Object to the inclusion of	The same objections were
Margaret Stanier	Local Allocations LA1 (Marchmont Farm) and LA2 (Old Town	raised by other commenters. The issues will therefore be considered through the Examination.

❖ Omissions Consultation

None

4.2 List of those making No Comment

❖ Main Consultation

Those making no comment and/or simply providing information:

- 1. Defence Infrastructure Organisation
- 2. Alan McKay
- 3. Mr and Mrs Welstead
- 4. Flamstead Parish Council
- 5. Chiltern District Council
- 6. AMEC for the National Grid
- 7. Luton Borough Council
- 8. The Coal Authority

Omissions Consultation

Those making no comment:

- Design Council
- Natural England
- Chilterns Conservation Board
- British Waterways

4.3 List of those making Comments on the Sustainability Appraisal, Strategic Environmental Assessment and/or Appropriate Assessment

Comments are reported with the sustainability appraisal.

❖ Main Consultation

Comments were received from:

- Hertfordshire County Council Archaeology section
- Natural England
- Savills for Grand Union Investments
- The Mount Residents Association (Lindsey Coates)
- Nick Hanling
- Boyer Planning for W Lamb Ltd

Omissions Consultation

None