

CORE STRATEGY REPORT OF CONSULTATION

Writing the Core Strategy – from Working Draft to Consultation Draft

Volume 5

Includes:

 Stakeholder consultation on the first draft of the Core Strategy

Timeline:



First published: October 2010

Edited: March 2011

Republished: October 2011

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આ પ્રકાશન **કેન્દ્રિય વ્યુહરચના વિશેનો મસલત અહેવાલ ગ્રંથ પ** છે. જો આ માહિતી તમારે તમારી પોતાની ભાષામાં મેળવવી હોય તો અથવા તો બીજા કોઈ પણ મુદદા વિશે તમારે કાઉન્સિલનો સંપર્ક કરવો હોય તો, મહેરબાની કરી 01442 867212 ઉપર સંપર્ક કરો.

જો આ માહિતી તમારે બીજા આકારમાં, જેમ કે મોટી છાપ, અથવા ધ્વનિ ટેપ (ઓડિયો ટેપ) માં મેળવવી હોય તો, મહેરબાની કરી 01442 228660 ઉપર સંપર્ક કરો અથવા ફક્ત મીનીકોમ માટે 01442 867877 ઉપર ફોન કરો.

Report of Consultation

The Core Strategy for Dacorum Borough has been prepared taking account of Government policy and regulation, technical evidence and consultation. Consultation has spanned seven years, from 2005 to June 2011. This report explains the consultation: i.e.

- the means of publicity used;
- the nature of the consultation;
- the main responses elicited;
- the main issues raised; and
- how they have been taken into account.

It also explains how the actual consultation relates to the Council's policy on consultation and engagement, the Statement of Community Involvement.

The report is presented in seven volumes:

- **Volume 1**: Emerging Issues and Options (June 2005 July 2006)
 - Annex A contains a summary of responses from the organisations consulted
- **Volume 2**: Growth at Hemel Hempstead and Other Stakeholder Consultation (July 2006 –April 2009)
- **Volume 3**: Stakeholder Workshops (September 2008 January 2009)
 - Annex A contains reports on each workshop
- **Volume 4**: Emerging Core Strategy (May September 2009)
 - Annex A contains a summary of responses to the general public consultation
 - Annex B contains reports from the Citizens' Panel and Gypsy and Traveller community
- **Volume 5**: Writing the Core Strategy from Working Draft to Consultation Draft (June September 2010)
- **Volume 6**: Consultation Draft Core Strategy (November 2010 June 2011)
 - Annex A contains a summary of responses to the general public consultation and reports from the Citizens' Panel and Town Centre Workshop. It also includes changes made to the Draft Core Strategy.

Volume 7: Overview

This is Volume 5.

CONTENTS

	Page
1. Introduction	1
2. Testing the Working Draft	2
Appendix 1: Cabinet Report 29 June 2010: Core Strategy	5
Appendix 2: Extract from the Minutes of Dacorum Partnership Meeting 14 th June 2010	21
Appendix 3: Stakeholders consulted	27
Appendix 4: Cabinet Report 14 September 2010: Dacorum Local Development Framework Core Strategy (includes Changes to the Working Draft)	35
Appendix 5: Supplementary Changes to the Working Draft	73

1. Introduction

- 1.1 The consultation period for the Emerging Core Strategy (and Issues and Options on the East Hemel Hempstead Area Action Plan) closed on 28 August 2009. The consultation included:
 - general public consultation (guided by a questionnaire covering themes and place strategies);
 - Citizens' Panel survey of place strategies
 - Survey of Gypsy and Traveller Community views (in particular with respect to the draft policy on Accommodation for Gypsies and Travellers).
- 1.2 Borough councillors were briefed on the results of the consultation by officers in October 2009. The results of the consultation were published in January 2010 (and reissued with additional information in October 2010).
- 1.3 An internal working group of councillors and officers (the Development Plans Task & Finish Group) helped develop the Emerging Core Strategy into Working Draft Core Strategy between November 2009 and June 2010. The group used the results of the consultation and evidence from technical studies to guide it.
- 1.4 Over this period there was considerable uncertainty as to the future of the regional spatial strategy the East of England Plan and its review. This meant that the Council was considering various options for development levels and location, as well as the possibility of there being no regional spatial strategy (RSS). In the event, the repair of the RSS (which could have reinstated a very high level of growth at Hemel Hempstead) was abandoned. The review of the RSS was also abandoned. The Secretary of State for Communities and Local Government announced revocation of the RSS in July 2010. This 'decision' later became the subject of a legal challenge in the courts.
- 1.5 The Council's Cabinet considered progress on the Core Strategy on 29 June 2010 (see Appendix 1). Cabinet concluded that work on the Core Strategy should continue. It had the support of the Dacorum Partnership (the Local Strategic Partnership) to do so (from its meeting on 14 June 2010 see Appendix 2). Dacorum Partnership also endorsed the approach being taken to the central challenges in the Core Strategy. Cabinet agreed that further work and consultation with key stakeholders was necessary before it was appropriate to finalise and publish a draft of the Core Strategy for general consultation.

2. Testing the Working Draft

- 2.1 In July 2010, a range of key stakeholders was consulted on the Working Draft (see Appendix 3). These comprised Dacorum Partnership and organisations and representatives whose feedback would help test the Council's thinking and improve the Core Strategy. The majority of the views received are included in the Cabinet Report, 14 September 2010 (see Appendix 4). They provide considerable support for the Working Draft.
- 2.2 Reports from the Council's "critical friend" and from the Commission for Architecture and the Built Environment (CABE) on process, presentation and content of the Core Strategy are summarised and included in Appendix 4.
- 2.3 The Planning Inspectorate declined the request to visit the Council, and Go East (the Government Office) advised it could not comment formally.
- 2.4 However officers from Go East helped Council officers assess the need for the inclusion of RSS policies in the Core Strategy. This was a check to ensure that, whether the RSS was formally revoked or not, the Core Strategy would contain the appropriate long term policy framework for Dacorum. Relatively little change was needed to the Working Draft. Written references to the RSS were removed.
- 2.5 A sustainability appraisal of the Working Draft was undertaken by the Council's consultants. Most of their recommendations are covered in Appendix 4.
- 2.6 Supplementary comment and recommendations from the Sustainability Appraisal Working Note which were received too late to be included in the Cabinet Report 14 September 2010 are contained in Appendix 5.
- 2.7 Changes shown in Appendix 4 and Appendix 5 were incorporated into the Working Draft. The changes were mostly of a detailed nature to elaborate and clarify, rather than to provide any fundamental shift in policy. Some of the more important changes relate to the RSS (ref para 9 above), the inclusion of a summary of the strategy, the re-presentation of some statements as policy, the inclusion of stronger urban design policy for Maylands Business Park, clearer commitment to the promotion of sensitive rural land management and understanding of green infrastructure, and strengthening the sustainability of the Core Strategy.
- 2.8 Full Council agreed to proceed with general public consultation at its meeting on 29 September 2010. The Working Draft then became known as the "Consultation Draft Core Strategy".
- 2.9 The Consultation Draft and a revised Sustainability Appraisal was published for the start of the subsequent consultation on 3 November 2010.

APPENDICES

Appendix 1

Cabinet Report 29 June 2010: Core Strategy

AGENDA ITEM: 12

SUMMARY



Report for:	Cabinet
Date of meeting:	29 June 2010
PART:	1
If Part II, reason:	

Title of report:	CORE STRATEGY	
Contact:	Stephen Holmes, Portfolio Holder for Strategic Planning and Regeneration	
	Author: Richard Blackburn – Senior Manager for Spatial Planning Team (ext 2584)	
Purpose of report:	To outline progress with the Core Strategy	
	To consider the working draft of the Core Strategy and key challenges	
	3. To outline the next steps	
Recommendations	To note progress with the working draft	
	 To agree the approach set out in Table 1 for developing the working draft into a document ready for publication: this will include Officers conducting consultation with key stakeholders and advisers in order to help (a) refine the content of the draft; and (b) determine the formal process through to adoption. 	
Corporate objectives:	Preparation (and delivery) of the Local Development Framework and its component parts contributes to all the	

	corporate objectives. The aim is to achieve top quality sustainable development in the right places with the right infrastructure and protection of green space.	
Implications: Financial/ Value for Money	The process of preparing the Core Strategy as part of the LDF has financial implications. Cabinet considered the implications of a three year budget programme when considering the Annual Monitoring Report and progress towards the Local Development Scheme on November 2009. Budget provision, together with an LDF reserve, is made for 2010/11.	
	Having an up to date planning policy framework normally helps reduce the incidence of planning appeals (and thus costs associated with those). It will also be the most effective way of ensuring the optimum level of developer contributions to infrastructure and in mitigation of development impacts can be achieved.	
Risk Implications	The Core Strategy (and LDF) embraces and contributes to IDP Project 160, Growth area. Key risks are separately identified for the IDP Project, and are also fully listed in the Local Development Scheme and reviewed annually with the Annual Monitoring Report. They include failure of external agencies or consultants to deliver on time, change in Government policy and team capacity.	
Equalities Implications	Equality Impact Assessment carried out. The issues covered by the Core Strategy include affordable housing and homes for minority groups, accessibility of facilities and local employment. An independent sustainability appraisal will consider equalities issues separately.	
Health and Safety Implications	They are included in the planning issues covered by the Core Strategy.	
Monitoring Officer/S.151 Officer Comments	Monitoring Officer: No comments to add. S.151 Officer No additional comments	
Consultees:	The report refers to consultation undertaken at various stages. Development Plans Task & Finish Group has been consulted on the preparation of the working draft of the Core Strategy.	
Background papers:	Report of Consultation on the Core Strategy (especially Volume 4)	
	The process is guided by the 2008 (Local Development)	

(England) Regulations and 2004 Planning and Compulsor	У
Purchase Act, and uses Government advice in PPS12: Local	al
Spatial Planning.	

BACKGROUND

1. CONTEXT

- Dacorum Borough Local Plan 1991 2011 was adopted in April 2004. Clarity of purpose and clarity of policy in the Local Plan has enabled the Council to shape Dacorum over the past ten years and, in doing so, resist inappropriate development proposals.
- 2. The Local Plan does not have a precise end date in that saved policies will continue to be relevant after 2011. However, since adoption of the Plan, the Council has recognised that its quantitative policies (which run to 2011), and its view of the future would need comprehensive review.

Pre-General Election (before May 2010)

- 3. The review of the Local Plan started under the planning system and legislative framework introduced by the 2004 Planning and Compulsory Purchase Act. Local planning was redefined then as:
 - local spatial planning a process of place shaping and delivery.
- 4. Local spatial planning underpins the wider corporate strategy of the Council and Local Strategy Partnership in that it:
 - brings together a very wide range of different services, since most require land to operate, so it can help to support the co-ordination of services;
 - ensures that strategies can be based on the community's views and obtain community buy-in;
 - ensure that other strategies can be fully cognisant of and play their part in respect of issues such as flooding, waste management and transport;
 - can assist in providing the base for, and monitoring of, other strategies; and
 - is a major means of engaging with the private sector."

(para. 2.2 Planning Policy Statement 12).

- 5. Local spatial planning is to be achieved through:
 - a set of policies and guidance (the Local Development Framework (LDF))
 - with a supporting infrastructure plan; and
 - a process of development management.

- 6. The core strategy is the head of the LDF and everything else (in the LDF) must conform with it. Government advises all local planning authorities to produce a core strategy. Dacorum's should include:
 - a vision which sets out how the Borough and places within it should develop;
 - the objectives which focus on the main issues to be addressed;
 - a delivery strategy i.e. how much development happens where, when and by what means it will be delivered; and
 - arrangements for managing and monitoring the strategy.

Its time horizon must be at least 15 years from the date of adoption. The core strategy is therefore important in the long term, medium term and short term.

- 7. Current legislation and advice requires the core strategy to be conformity with the Regional Spatial Strategy (the East of England Plan).
- 8. The core strategy (and all other development plan documents) must undergo an independent examination by an Inspector. Firstly, there is a check that legislation has been compiled with. The correct procedure should be followed; the document should have regard to the community strategy; and it should be subject to sustainability appraisal. Secondly the Inspector assesses whether the core strategy is sound. This means it must be consistent with national policy and should be "justified and effective". The two tests are critical, and mean the document must be:
 - justified -
 - founded on a robust and credible evidence base;
 - the most appropriate strategy when considered against reasonable alternatives;
 - effective -
 - deliverable; and
 - flexible.
- 9. Dacorum's core strategy has been prepared to meet these particular tests:
 - the studies and consultation we have undertaken are rooted in national policy needs and local aspirations and provide the foundation for the Council's ultimate approach
 - reasonable options are being tested, particularly in respect of location and scale of change/growth
 - an infrastructure planning process has started through the preparation of an infrastructure plan (adding to the Hertfordshire Infrastructure and Investment Study) and the setting up of an Infrastructure Delivery Board under the Dacorum Partnership
 - contingencies must be considered to ensure flexibility.

Post General Election

- 10. The new Government has stated that it proposes changes to the planning system, based on the Conservative Party's Green Paper: 'Open Source Planning'. The key principles are the abolition of regional spatial strategies (RSSs) and reforming the planning system to benefit local communities by giving them more control over the way they develop. The changes will be introduced and explained over the forthcoming weeks, and transitional arrangements are likely.
- 11. Officers have met with GoEast, and further discussions will take place as the Government's policy on the practical delivery of planning is elaborated. The initial view of the Government is understood to be as follows:
 - (a) national guidance

A slimmer suite of planning policy statements will be produced.

(b) regional planning

Primary legislation will be enacted to abolish RSSs. Government will advise on a transitional phase. The East of England RSS review has been put on hold.

(c) local planning

Under the agenda of "localism", local planning will be very important. The main principles of the current system outlined in paras. 4-6 and 8 above are most likely to be retained. Good planning also requires alternatives to be tested and contingencies put in place. However Inspectors' reports following examination of a core strategy may no longer be binding on a council.

(d) policy priorities

The key priorities are

- (i) economic growth i.e. recovery from the recession and development of a low carbon economy
- (ii) housing delivery (addressing current and predicted shortfalls).
- (e) Infrastructure and investment

There will obviously be public expenditure programmes, but public investment is likely to be tight, in the short term at least. Additional support for the provision of infrastructure will come from a development tariff and an incentivisation scheme. The development tariff will replace the community infrastructure levy. The aim of using contributions from development towards the cost of infrastructure is essentially the same. Local authorities will be incentivised to support housing delivery: they will receive 100% of council tax on new homes and 125% on new affordable homes for a period of 6 years.

12. The clear advice from GoEast is to continue with the preparation of Dacorum's core strategy. The importance of an up to date "local plan" has been reiterated. GoEast consider that the Council is in a good position to make further progress because of:

- the evidence work that has been undertaken;
- the extent of public consultation and local place workshops; and
- the publication of (and consultation on) the Emerging Core Strategy last year.

2. PROGRESS

- 13. The process of evidence gathering, consultation and adjustment to changing Government and regional guidance which began in 2005 has culminated in the preparation of a working draft of the core strategy.
- 14. The substantial evidence base includes housing land, retail, employment, urban design, nature conservation, flood risk, infrastructure, climate change and open space studies and more. All studies have been subject to their own stakeholder consultation. There are still gaps in respect of viability and water infrastructure, but what is available provides a good foundation to move forward with.
- 15. Several phases of consultation have been completed:
 - (1) Emerging Issues and Options (July/August 2005)
 - A preliminary consultation raising issues with the Hemel 2020 consultation
 - (2) Issues and Options (May/June 2006)
 - A full consultation on all core strategy issues linked to the Deposit Draft East of England Plan
 - (3) Growth at Hemel Hempstead (Nov/Dec 2006)
 - A joint consultation with St. Albans Council on the implications of accommodating a high level of housing growth around the town: this had been introduced by Proposed Changes to the East of England Plan following the Panel's Report on the Examination of the Deposit Draft.
 - "Blue blobs" indicated location options where much of the 17,000 additional dwellings (2006-2031) could be accommodated.
 - A linked consultation considered Site Allocations (Nov 2006-Feb 2007).
 - (4) Place Workshops (Sept 2008 Dec 2009)
 - Invited representatives from a wide range of stakeholder interests debating planning issues affecting their place (i.e. one of the six main settlements and the countryside). Separate young persons' and senior voice workshops were also held. The workshops helped inform the place strategies and local issues that were included in the Emerging Core Strategy.
 - (5) Emerging Core Strategy (June Aug 2009)
 - A full consultation on the approach to borough-wide planning policies, and local place strategies and issues. A linked consultation on issues and options affecting East Hemel Hempstead, particularly the Maylands business neighbourhood, was held. However a joint consultation planned with St. Albans Council on alternative

growth strategies for Hemel Hempstead to help deliver 17,000 additional dwellings was cancelled because that element of the East of England Plan was removed through a High Court judgement.

- 16. Reports on all these consultations have been published, the most recent volumes covering the Emerging Core Strategy. The types of consultation include:
 - questionnaire survey of the Citizen's Panel
 - separate discussion with focus groups and workshops
 - targeted discussion with key stakeholders (e.g. HCC as local education authority or local highways, the Primary Care Trust).
 - discussion with members of the LSP through initial workshop, the support group, theme forums and the Board; and
 - general public consultation
- 17. Like other local authorities, the Council has been learning about the 2004 planning system from experience, particularly what is expected to produce a sound document. Officers have taken advice from peers, the Government Office, the Planning Officers Society and the Planning Advisory Service. Critical Friend reports (provided by the POS) and a diagnostic (provided by the PAS) have been constructive and helpful, and mostly very supportive of the progress achieved and approach taken by the Council in the face of a difficult set of circumstances produced by the Regional Spatial Strategy.
- 18. Members have been briefed on progress and on issues at particular stages. They have also been involved in selected place workshops. Cabinet agreed the Emerging Core Strategy for consultation on 20 May 2009. Development Plans Task and Finish Group has been considering the issues, principles and policy options in developing a working draft of the Core Strategy from November 2009. Their views are incorporated into the draft, though there are some outstanding issues and an unresolved challenge relating to the level and location of new housing to enable the delivery of sustainable communities i.e. the right balance between homes, jobs, supporting facilities and the environment over 20 years; and the right balance between current population demands and future needs. Task and Finish Group's priorities on this matter may be simply summarised as supporting protection of the countryside and economic prosperity before the provision of new homes.
- 19. Progress on the working draft is being reported to the LSP Board, Strategic Planning and Regeneration Overview and Scrutiny Committee and Cabinet during June. Feedback will be reported orally, as appropriate.

Regional Spatial Strategy (RSS)

20. The progress and status of the RSS has created uncertainty. The RSS is part of the development plan for Dacorum until replaced (or superseded). However part of the RSS was quashed in the High Court and remitted to the Secretary of State for reconsideration (or "repair") in July 2009. This means that the potential major growth of Hemel Hempstead has been put on hold and as a result there is no housing target for the borough. The repair may not be completed in the light of the new Government's views on regional planning.

- 21. It has been the norm for over 40 years for a housing target to be provided to Dacorum by a higher tier authority. The sudden lack of a target in the RSS presents the Council with an opportunity to assess more carefully the appropriate level of housing that will achieve its view of a sustainable community. In doing so it is necessary to consider reasonable alternatives, including the potential delivery of the natural growth of households in Dacorum. This is estimated to require 500 dwellings per annum (2006-2031).
- 22. Cabinet considered a report on the review of the East of England Plan on 24 November 2009. Cabinet supported the Hertfordshire-wide approach of a continuation of existing RSS policy (i.e. Scenario 1). For Dacorum this meant a *minimum* of 304 dwellings p.a. and potentially very much more if the RSS "repair" process was completed. The Hertfordshire authorities did not support a blanket approach of pursuing the 2006 based household projections across the county (i.e. Scenario 4). For Dacorum, this would have meant a *minimum* of 500 dwellings p.a. The Council expressed its objection to widespread growth, because of environmental effects and concerns over the proper provision of infrastructure.
- 23. The Cabinet report noted that higher housing growth (either Scenario 4 or above) for Dacorum would result in a better match between jobs growth and housing. And without this higher housing growth, the key regeneration aspirations of Hemel 2020 would be harder to fund and deliver. If jobs growth, strengthening the local and sub-regional economy, was successful, and there was no promotion of housing, the probability is that traffic congestion would be exacerbated (as a result of more in commuting).
- 24. Furthermore, if the RSS ultimately contained a level of growth that could not be accommodated "without a strategic Green Belt review at Hemel Hempstead", the RSS should make the preferred direction of that growth quite clear. Technical work had indicated that "preference should be given to land to the east of Hemel Hempstead, most of which is outside the control of Dacorum Borough Council [i.e. it is in St. Albans]."
- 25. The new Government has requested the East of England Local Government Association (which has responsibility for the RSS) not to progress the RSS review.

3. PROGRESS

- 26. The Emerging Core Strategy has formed the basis for the development of the working draft of the Core Strategy:
 - (1) The approach taken to the vision, objectives and the themes has been broadly supported.
 - (2) The place strategies have received a more mixed response. Many aspects are supported, including, by many, the principle of sustaining the main settlements. There has been opposition to greenfield options proposing new homes. The principle of having the place strategies however appears to be welcomed.
 - (3) The structure is generally accepted.
- 27. The structure of the working draft is as follows:
 - 1. Introduction, with a Borough portrait
 - 2. Vision for 2031 and Objectives

- 3. Overall Strategy
- 4. Theme sections covering
 - (a) Economic Prosperity
 - (b) Homes and Community Needs
 - (c) Environment
- 5. Place strategies for the main settlements and the countryside.
- 6. Delivery (and infrastructure)
- 28. The working draft includes the following key items which the Emerging Core Strategy did not: i.e.
 - the Borough portrait
 - policies in sections on Overall Strategy, Themes and Delivery
 - the delivery section itself.

It is intended as a policy document.

- 29. The working draft is available in the Members' Rooms. Members are reminded that as a working draft the document is subject to:
 - full collation and editing
 - further checking of issues with key stakeholders and advisers and sustainability appraisal (see Next Steps below).
- 30. The challenges that are addressed in the Core Strategy (and cannot be avoided) are divided into two:
 - (1) The core challenge is to provide balanced and sustainable growth (Box 1)
 - (2) The remaining challenges relate more specifically to the Borough's economic health, the well-being of its residents and the future of its environment. (Box 2).
- 31. The core challenge may be expressed as delivering sustainable communities, a balance of new jobs and economic prosperity with new homes, and with due concern for the environment and environmental capacities. Unconstrained building development is not acceptable. However economic prosperity, recovery from recession and regeneration ambitions for Maylands and Hemel Hempstead Town Centre require prolonged promotion. They are more likely to be achieved with higher levels of local expenditure (accompanied by new homes and growth in the construction industry). Affordable housing and development contributions to infrastructure follow other housing development.

Box 1

Challenge 1 - Balanced and sustainable growth

New jobs ought to give residents a choice of working close to where they live. These jobs will need to be in a range of different sectors to suit differing skill levels, but focus upon those sectors where there is predicted be the largest rise in future demand.

Locally generated housing needs, based on the natural growth of the existing population, ought to be accommodated. The right type of housing should be provided in the right locations, taking into account changes in the population structure. The Borough's high average house prices should be compensated for by a rise in the number of new affordable homes, catering for a range of different needs.

By carefully considering the location of homes, jobs and essential services, travel demand can be managed, congestion and pollution eased and all residents given better access to the places where they work, shop and spend leisure time. This can also help to reduce the predicted growth in traffic on the M1 and other heavily congested routes through central Hertfordshire.

The approach to new development and growth must recognise the Borough's environment and countryside, and therefore it is appropriate to exercise some restraint.

- 32. Two alternative housing scenarios are emerging from the core challenge:
 - (a) to continue with the current Local Plan 360 dwellings p.a.; or
 - (b) to deliver sufficient housing to meet the natural growth of Dacorum's resident population almost 500 dwellings p.a.

Officers have been assessing alternative housing programmes based on these two scenarios. There is uncertainty around the future of "Waterhouse Square" and other sites in the town centre, which need further investigation and affect both scenarios. Setting that aside, the conclusion is that a reasonable housing programme would:

- 1. be between 360 and 500 dwellings p.a.; but
- 2. not achieve 500 dwellings p.a., unless there was growth outside Dacorum (i.e. east of Hemel Hempstead in another authority's area).

Subject to further testing, the lower housing scenario could be around 385 dwellings p.a. and the higher around 450.

33. Some places, notably Tring and Bovingdon, are unlikely to sustain their existing populations or provide significant numbers of new affordable homes without limited new greenfield development.

Box 2

Challenge 2 - Strengthen the role of the Maylands Business Area

The Maylands Business Area is the largest in the Borough and also of sub-regional importance. Its success is critical to the wider economic prosperity of the Borough and beyond. The need for a strong regeneration focus was given added impetus by the Buncefield explosion in December 2005. The development of The Gateway as a green business park will assist with long-term recovery and provide skilled jobs. The area currently suffers from a lack of services and facilities accessible to its daytime population. Proposals for the Heart of Maylands will be critical in filling this gap and help improve the attractiveness of the areas to employees and employees alike.

Challenge 3 - Regenerate Hemel Hempstead town centre

The range of shops and facilities offered by Hemel Hempstead town centre has already been improved through the Riverside development. However, further improvements to both the retail offer and quality of the overall environment must be made if the town is to compete with larger sub-regional centres across the Borough boundary. Central to this regeneration is the provision of new homes and high quality office space, both of which will increase footfall. A performing arts venue will help revive the evening economy and improve the range of cultural facilities available to local residents.

Challenge 4 – Strong, inclusive communities

The impact of new development upon community cohesion and local character must be carefully considered. In particular it must contribute fully to infrastructure needs and not result in undue pressures upon local schools, health facilities and other key services and facilities. Where possible it should help increase the range of social, leisure and cultural facilities, which are currently quite low for the size of the population. Inequalities, whether based on race, gender, religion or income, must be reduced.

Challenge 5 – A resilient natural environment

The combined effects of climate change and population growth 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, and careful land management.

Challenge 6 – A high quality and sustainable environment

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 the impacts of climate change, through sustainable design and construction.

- 34. The Core Strategy not only covers the key areas of development and change, it also introduces some very important new policies on:
 - urban design

- sustainable construction
- energy; and
- water management.

In keeping with the philosophy of local spatial planning, it covers delivery issues and infrastructure more fully.

4. NEXT STEPS

- 35. To date, the Core Strategy is a working, not complete, draft. Because the planning system is "front loaded", it is important to consider relevant issues through the process and not simply at the end. Members are however asked whether they consider there are any issues that have been missed and should be included in the Core Strategy.
- 36. The key tasks still to be undertaken are:
 - (a) evidence

Further viability testing is necessary to formulate sound affordable housing targets, and further investigation of potential sewerage issues would be prudent in the light of results from the water cycle scoping study. In order to conclude any housing programme, further thought needs to be given to the potential contributions from the town centre in the light of work on the Hemel Hempstead Town Centre Master Plan over the summer.

(b) issues

There are issues, for example, related to highway matters (e.g. New Road link) and provision of primary schools that merit further discussion with the relevant providers.

(c) policy testing

Policy testing includes sustainability appraisal. This is an iterative process and would appraise key housing programme alternatives and the wording of policies. It is a legal requirement for publication of a core strategy and is recommended now. Policy testing can also involve simple discussion with key stakeholders, the purpose being to test the effectiveness of implementation of a policy. The process of options appraisal – work on alternative development strategies for major growth at Hemel Hempstead and local appraisals – should be completed and published. The local appraisal work is a very much fuller consideration of modest development options which were presented with the Emerging Core Strategy. The elimination of options is an important part of the process, just as the selection of any option is.

(d) drafting

Amendment may follow from the consideration of evidence, issues and policy testing, even though much has been concluded. Collation of sections and editing for consistency and to avoid any duplication are necessary. Policies in the current Local Plan, which will be superseded, will be listed.

37. Members are asked to note the stage reached and to give their support to the further work needed, particularly sustainability appraisal, before a core strategy can be presented to Council for consideration. Table 1 summarises the next steps.

Table 1: Core Strategy – timetable

Date	Meetings and Key Tasks
June	(a) LSP Board 16/6 (b) SPAR OSC 17/6 (c) Cabinet 29/6 (Working Draft Core Strategy)
July	 (d) Testing 'Soundness' of Core Strategy through: Sustainability Appraisal of policy wording and key alternatives Planning Inspectorate visit and feedback Critical Friend input Feedback from key parties e.g. education authority
August	(e) Filling gaps where possible (e.g. on viability) (f) Taking advice on the formal process from GoEast and others
September	(g) Members' Briefing (h) Cabinet 14/9) to agree a Core Strategy (i) Full Council 29/9)
October/ November	(j) Consultation commences

- 38. It will be prudent to take advice on the formal procedures to be followed. There will probably be options but further discussion with GoEast, and if possible, the Planning Inspectorate, will guide these. A self-assessment (by officers) using the Planning Advisory Service's tool kit is advised by the Inspectorate.
- 39. From preliminary discussions with GoEast, the choices of formal procedure would currently be:
 - (i) publication of the Council's core strategy (i.e. the one the Council wants; or
 - (ii) a short, focused consultation on a draft core strategy.

The latter would include

- the two housing scenarios
- small/modest development options at Hemel Hempstead to complete the
 options appraisal across the borough. [Members are reminded that no
 greenfield option at Hemel Hempstead was raised in the Emerging Core
 Strategy because of the High Court judgement on major urban extensions].
- the proposed policies.

It would be the preferred approach on current information and circumstances, but any decision would be informed by sustainability appraisal and further, independent advice.

Resolution

26/06/10 CA/102/10 Item 12 Core Strategy.	 That the progress with the working draft be noted. That the approach set out in Table 1 of the report for developing the working draft into a document ready for publication be noted: this will include Officers conducting consultation with key stakeholders and advisers in order to help (a) refine the content of the draft; and (b) determine the formal process through to adoption. 	Cllr S Holmes, Portfolio Holder for Strategic Planning and Regeneration; Richard Blackburn, Senior Manager, Spatial Planning Team.
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Appendix 2

Extract from the Minutes of Dacorum Partnership Meeting 14th June 2010

Extract from the Minutes of Dacorum Partnership Meeting 14 June 2010

WORKING TOGETHER – LOCAL STRATEGIC PARTNERSHIPS AND LDF's 7.

James Doe, Head of Planning and Regeneration, Dacorum Borough Council gave an update.

The partnership were asked to consider key issues arising out of the current progress on the Dacorum Local Development Framework (LDF) and how these are expressed in the refresh of the Sustainable Community Strategy (SCS)

J Doe outlined the key issues:

- Housing Levels and Affordability
- (a) (b) Economic Development and Business Aspirations
- (c)Community Planning
- (d)Regenerating Dacorum
- Green Infrastructure and Greening Dacorum (e)
- (f)Infrastructure Provision

Suggestions for the Partnership were:

- Deliver a defined number of new homes per year
- Achieve on average 35% of new dwellings as affordable
- Facilitate site development towards the goal of 18,000 new jobs in Dacorum by 2031.
- Support a programme of inward investment and site facilitation (priority given to Maylands Business Park)
- Develop a new approach to the regeneration of Hemel Town Centre and its Neighbourhood Centres
- Agree key projects from the Green Spaces Strategy
- Support a focused initiative for reducing the Borough's carbon footprint
- Deliver an Environmental Education Centre
- Fill the infrastructure gaps (defined in the Dacorum Infrastructure Plan)
- Identify developer contribution priorities
- Participate in collaborative local investment Planning through combined use of Capital assets.

J Doe said that a report would be presented to Cabinet on 29 June 2010. Consultation to be formalised to take place in September.

Planning Together 2 poses nine key actions as listed on page 2 of the report. The first four points are where we are at present. SCS refresh is coming up.

(a) <u>Housing</u>

D Bogle said that growth is required in housing. Schools, shops/pubs are closing and there is no new housing available. Young people and key workers need to be close to work. There is a link between jobs and housing growth. The list from A-K is commendable and shows reasonable growth over next couple of decades. He said that no-one wants to build on greenbelt land but asked if there were any greenfield sites available?

Councillor Roberts replied that County is looking at refreshing. Cannot build in gardens/greenbelt etc, not much brownfield land around. He agreed that A-K was fine and there are no plans to build on the greenbelt. He said that County would be looking towards exploring sites towards the MI but St Albans would say no to development. Looking towards developing high quality development but this would take up more land.

(b) Economic Development and Business Aspirations

The revised Regional plan puts forward a jobs growth target of 18,000 additional jobs by 2031. This is not a mandatory requirement and here is concern that there would not be enough housing to achieve this level. Partners were asked to consider what resources could be put in place.

(c) <u>Community Planning</u>.

The LDF has a series of settlement strategies in place. There are specific recommendations for each of Dacorum's three towns (Hemel, Berkhamsted and Tring), three large villages (Kings Langley, Bovingdon and Markyate) and the Countryside generally. Partners will need to take ownership of the issues arising from each settlement.

(d) Regenerating Dacorum

Rejuvenating Dacorum is a cross-cutting theme of the SCS through the Hemel 2020 Programme. Much of the drive comes from the in-house Hemel 2020 Team at DBC and partnership arrangements including the LSP's Infrastructure and Hemel 2020 Delivery Board and the Maylands Partnership and Maylands Implementation Team are functioning well. The Homes and Communities Agency (HCA) are looking to establish Local Investment Plans. The Executive's View on raising the profile of regeneration activity through a new planned and collaborative approach to the use of capital assets was sought and they were asked to continue to support the 20/20 Programme taking into account how we engage as partners.

(e) Green Infrastructure and Greening Dacorum

Up and coming things looking at greening of the Borough. There are Two principal issues:

- Management of green infrastructure
- The reduction of the Borough's Carbon footprint

The executives view was sought on how to best promote green infrastructure and low carbon developments, with the focussed use of limited resources.

(f) Infrastructure Provision

Key issues for the SCS refresh are to consider how new infrastructure delivery is co-ordinated and which priorities are established for the securing of developer contributions. The Partnership's role will be to consider its priorities as DBC as the implementing authority for s.106, CIL or other such system, shapes its approach. Work on developing the infrastructure plan is being co-ordinated through the infrastructure and Hemel 2020 Delivery Board.

Discussion and Questions

Councillor Williams – 18,000 new jobs, is this just in terms of area or does it include new housing.

J Doe replied this relates just to new jobs as housing is a separate issue.

Councillor Roberts – Maylands concerned this is not tuned into large facilities as in the past. This needs to be built into the LDF and Infrastructure Plan.

J Doe – The Hemel Hempstead Gateway should avoid this from happening but it is tough on the planning side as we are not trying to attract high value.

Outcome:

The report was noted by the Board.

DACORUM LOCAL DEVELOPMENT FRAMEWORK (LDF) CORE STRATEGY

The Board was asked to consider the draft report which will be presented to the Strategic Planning and Overview Scrutiny Committee on 17 June and Cabinet on 29 June 2010.

J Doe highlighted Paragraphs 26-29 and the challenges set out from Paragraph 30 onwards and in boxes 1 and 2 of the report.

The recommendation to the Board was:

- Endorse the approach taken with the LDF Core Strategy
- Provide any comments regarding the content of the Core Strategy
- Any further comments to be provided to the Spatial Planning Team by Friday 30 July 2010.

Discussion and Questions:

John Allan - Tring Parish Council asked when funding was coming through?

J Doe replied that this would be coming from a regional level based on demographic figures.

Outcome:

The report was noted and the recommendations were agreed.

Appendix 3

Stakeholders consulted

Stakeholder Consultees

ORGANISATION	SECTIONS REQUIRED
External	<u> </u>
Paul Fellowes Government Office for the East of England Eastbrook Shaftesbury Road Cambridge CB2 8DF	• All
The Planning Inspectorate Registry/Scanning Room 3/05 Kite Wing Temple Quay House 2 The Square Temple Quay Bristol BS1 6PN	• All
Andrew Wright POS Enterprises Ronaldsway House Bilstone Nuneaton Warwickshire CV13 6NG	• All
Hertfordshire and Middlesex Wildlife Trust Grebe House, St Michael's Street, St Albans, Herts AL3 4SN	 Contents page Enhancing the natural environment Countryside Strategy

Colin White Chilterns Conservation Board The Lodge Station Road Chinnor Oxon OX39 4HA Martin Hicks Hertfordshire Biological Records Centre Hertfordshire County Council County Hall Pegs Lane Hertford SG13 8DQ Matthew Wood HCC Property Hertfordshire County Council County Hall Pegs Lane Hertfordshire County Council County Hall Pegs Lane Hertford SG13 8DQ	 Contents page Enhancing the natural environment Conserving the historic environment Introduction to place strategies Countryside Strategy Contents page Enhancing the natural environment Introduction to place strategies Countryside Strategy Contents page Meeting community needs Introduction to place strategies All Spatial Strategies
James Dale Highways Hertfordshire County Council County Hall Pegs Lane Hertford SG13 8DQ Simon O'Dell HCC Landscape Hertfordshire County Council County Hall Pegs Lane Hertford SG13 8DQ	 Contents page Enabling convenient access between homes, jobs and facilities Introduction to Place Strategies All of the Place Strategies Contents page Enhancing the natural environment Introduction to place strategies Countryside Strategy
Stuart Bryant	Contents page

HCC Archaeology Hertfordshire County Council County Hall Pegs Lane Hertford SG13 8DQ Andy Hardstaff / Isabel Crozier Countryside Management Service The Nursery Site Hixberry Lane St Albans Herts, AL4 0TZ	 Enhancing the natural environment Conserving the historic environment Contents page Enhancing the natural environment Introduction to place strategies Countryside Strategy Strengthening Economic Prosperity (sections on tourism and rural economy only)
Roger Estop Inspire East Level 5 Breckland House St Nicholas Street Thetford Norfolk IP24 1BT	 Contents page Securing quality design Historic Environment Tring Spatial Strategy
Jon Tiley HCC Forward Planning HCC Landscape Hertfordshire County Council County Hall Pegs Lane Hertford SG13 8DQ	• All
Natalie Blaken East of England Development Agency Victory House Vision Park	 Contents page Introductory sections Strengthening Economic Prosperity

Chivers Way Histon Cambridge CB24 9ZR LSP – each Board Member and Support Group rep	All (either by paper copy, CD or via password protected)
Sean Rendell (via his POS role) (by email)	 website). Contents page Promoting sustainable development Using resources efficiently
Philip Pearson Homes and Communities Agency Central Business Exchange II 414-428 Midsummer Boulevard Central Milton Keynes MK9 2EA	 Contents page Strengthening Economic Prosperity Introduction to Place Strategies Hemel Hempstead Spatial Strategy
Darren Rhoden Senior Network Manager Highways Agency 2nd Floor Woodlands Manton Lane Bedford MK41 7LW	All (informally guided to Hemel Hempstead Spatial Strategy and Enabling convenient access between, homes jobs and facilities)
Internal	
Claire Covington	Contents pageEnhancing the natural environment
Chris Taylor	 Contents page Introductory sections Strengthening Economic Prosperity

Development Management	• All
Conservation	Contents page
	 The Sustainable Development Strategy (design sections)
	 Enhancing the natural environment (historic environment and
	climate change sections)
	 Introduction to Place Strategies
	All Place Strategies
Dave Gill	• All
Vicky Nash	Contents page
	 Enhancing the natural environment (climate change section)
Peter Hamilton	Contents page
	Markyate Spatial Strategy
Dacorum's Strategic Housing Board members (by email following FW's introduction at 30/6 meeting)	Contents page
	Intro
	Providing homes

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Appendix 4

Cabinet Report 14 September 2010: Dacorum Local Development Framework Core Strategy

(includes Changes to the Working Draft)

AGENDA ITEM: 10



SUMMARY

Report for:	Cabinet
Date of meeting:	14th September 2010
PART:	I
If Part II, reason:	

Title of report:	DACORUM LOCAL DEVELOPMENT FRAMEWORK CORE		
Title of reports	STRATEGY		
Contact:	Stephen Holmes, Portfolio Holder for Strategic Planning and Regeneration		
	Author: Richard Blackburn – Senior Manager Spatial Planning (ext 2584)		
Purpose of report:	4. To outline recent progress with the Core Strategy		
	5. To consider the draft of the Core Strategy for consultation		
Recommendations	It is recommended that Cabinet recommend to Council		
	The approval of the draft Core Strategy for consultation; and		
	The authorisation of the Assistant Director Planning, Development and Regeneration to:		
	(a) finalise the wording of the draft in agreement with the Portfolio Holder for Strategic Planning and Regeneration		
	(b) conduct the consultation so as to draw out opinions and consensus on the alternatives and policy wording in the draft.		
Corporate	Preparation (and delivery) of the Local Development		

objectives:	Framework and its component parts contributes to all the corporate objectives. The aim is to achieve top quality sustainable development in the right places with the right infrastructure and protection of green space.	
Implications: Financial/ Value for Money	The process of preparing the Core Strategy as part of the LDF has financial implications. Cabinet considered the implications of a three year budget programme when considering the Annual Monitoring Report and progress towards the Local Development Scheme in November 2009. Budget provision, for the development of the Core Strategy was made for 2010/11 as part of the Budget/Policy Framework.	
	In addition, the Council has created a 'Local Development Framework' earmarked reserve to support future years expenditure.	
	Having an up to date planning policy framework helps reduce the incidence of planning appeals (and thus costs associated with those). It will also be the most effective way of ensuring the optimum level of developer contributions to infrastructure and in mitigation of development impacts can be achieved.	
Risk Implications	The Core Strategy (and LDF) embraces and contributes to IDP Project 160, Growth area. Key risks are separately identified for the IDP Project, and are also fully listed in the Local Development Scheme and reviewed annually with the Annual Monitoring Report. They include failure of external agencies or consultants to deliver on time, change in Government policy and team capacity.	
Equalities Implications	Equality Impact Assessment carried out. The issues covered by the Core Strategy include affordable housing and homes for minority groups, accessibility of facilities and local employment. An independent sustainability appraisal will consider equalities issues separately.	
Health and Safety Implications	They are included in the planning issues covered by the Core Strategy.	
Monitoring	Monitoring Officer:	
Officer/S.151 Officer Comments	No further comments.	
	S.151 Officer	
	The financial implications section above has identified that budget provision has been made for the development of the Local Development Framework Core Strategy within the current financial year. The service advises that expenditure is not expected to exceed this budget provision. Future	

	requirements will be considered as part of the budget preparation cycle. Also a review of the adequacy of the Local Development Framework reserve will be undertaken at this stage. Paragraph 23 of the main report refers to financial incentives from the Government, where housing growth is supported by the Council. At the time of writing this report it is anticipated that an announcement and consultation paper on "New Homes Bonus" incentive funding, will be made at or around the time of the Comprehensive Spending Review (which is due on 20 October 2010). An update of the implications of this announcement will be included in planned reports to Members on the preparation of Council budgets.		
Consultees:	The report refers to consultation undertaken at various stages. Development Plans Task & Finish Group has been consulted on the preparation of the working draft of the Core Strategy. The results of the limited stakeholder consultation in July are appended to the report. They have helped to develop the working draft into the current document.		
	Council should note that Strategic Planning and Environment Overview and Scrutiny Committee considered the draft Core Strategy on 21 September 2010.		
Background papers:	Report of Consultation on the Core Strategy (especially Volume 4)		
	The Core Strategy (current draft recommended for consultation)		
	Sustainability Appraisal report		
	Options Appraisals		
	The process is guided by the 2008 (Local Development) (England) Regulations and 2004 Planning and Compulsory Purchase Act, and uses Government advice in PPS12: Local Spatial Planning.		

BACKGROUND

INTRODUCTION

- 1. The Dacorum Borough Local Plan 1991-2011 is being reviewed, updated and gradually replaced. It is being replaced in stages: the first and most important is the completion of the Core Strategy.
- 2. The preparation of the Core Strategy has been "front loaded", with extensive research and consultation providing the foundation for the current draft.
- 3. The report to Cabinet on 29 June 2010 and to Strategic Planning and Regeneration Overview & Scrutiny Committee on 17 June 2010 set out:

- the context for preparing the Core Strategy, referring to policy pre and post general election;
- progress to June 2010 including introduction of a working draft Core Strategy;
- the structure of the Core Strategy and the key challenges faced; and
- the next steps to be taken and the timetable to commencement of consultation on the Core Strategy (i.e. end of October/beginning of November).
- 4. The report identified four tasks for the Summer period: i.e.

(a) obtaining further evidence

The consortium of local authorities (including Dacorum) and organisations responsible for water management has set up a reference group to help coordinate the planning of new development and infrastructure. The group has decided that further study work is unnecessary at this juncture. The infrastructure delivery plan work is concluding: publication of final reports is imminent.

The progress of refining and using new evidence will continue until the Core Strategy is finalised by the Council next year. The Council is participating in a county-wide green infrastructure study. However there are no major pieces of work outstanding which would cause delay.

(b) testing specific issues

The main issues have affected highways and education. Some highways work is ongoing. However there are no highways or education issues that would render Option 1 and Option 2 housing levels (see ahead) as unachievable or inappropriate. Specific infrastructure requirements are identified but could be refined.

(c) testing policies

Consultation with key stakeholders is recorded in Appendix 1 and recommended changes incorporated into the current draft. The consultation included Dacorum Partnership (LSP) members.

GO-East is due to be abolished and has offered no official view. However Government has advised that Core Strategies should be progressed pending any changes the New Government may introduce to the forward in Spatial Planning system. The Planning Inspectorate has suspended visits to local authorities.

The options appraisal of alternative development strategies at Hemel Hempstead and local development options is complete and will be published with the consultation draft.

The sustainability appraisal of policies and alternative housing levels has been written.

(d) editing of the draft Core Strategy document

This has followed from the above. Officers consider that the views of key stakeholders and providers have been captured, subject of course to confirmation through formal consultation.

- 5. The Council's "critical friend" from the Planning Officers Society has continued to provide advice on the local development frameworks. His recent report comments on process and procedure and recommends continuing with the programme for the Core Strategy. He suggests:
 - (a) bringing the place strategies forward in the Core Strategy text;
 - (b) a summary of the strategy itself;
 - (c) the transfer of some elements of the text with the polices; and
 - (d) the inclusion of key policies and principles for Maylands Business Park and the East Hemel Hempstead Area Action Plan (rather than simply leaving everything to the Action Plan).

Suggestions (b) - (d) have been followed now, as they are the more important. Specific comments relating to the text of the Core Strategy are included in Appendix 1.

THE CONSULTATION DRAFT

- 6. Members have a CD of the current draft of the Core Strategy. In addition there are hard copies on the Group Rooms. A members briefing was held on 8 September to run through the content of the Core Strategy and procedure. The Development Plans Task and Finish Group has provided advice and support in drafting at meetings between November 2009 and July 2010. The current draft reflects their advice on the visions, objectives, policy principles and housing alternatives.
- 7. The Core Strategy should:
 - give a clear direction, backed by evidence;
 - support local housing and economic growth;
 - be responsive to local communities; and
 - allow a degree of flexibility (since this is a long term document).
- 8. The current draft addresses the challenges and is now intended for consultation. This means that decisions on a preferred housing alternative, for example, do not need to be taken now, only that the alternatives can be consulted upon. The Council would determine its Core Strategy in the light of this consultation and any other relevant evidence or guidance. It would then publish the Core Strategy and submit it for examination by an Inspector. The publication stage will probably be around June 2011.
- 9. The "Consultation Draft" differs from the Emerging Core Strategy (June 2009) in two very important ways:
 - (a) it sets two scenarios for housing
 - (b) It includes written policies.

Housing Scenarios

- 10. The first of the six planning challenges set out in the draft Core Strategy (and in the previous Cabinet/Committee report), is the achievement of balanced and sustainable growth. Opportunities at Maylands Business Park and Hemel Hempstead Town Centre lead economic growth. The question is how much housing growth should be encouraged to support that growth and provide for local needs. In the absence of the regional spatial strategy alternatives are being tested.
- 11. Option 1 is based on urban capacity and consolidation. In essence, it is a continuation of the current policies, respecting the character of existing settlements and maintaining open space. Growth would be heavily focused in Hemel Hempstead. Even under this, the lower option, it is vital to maximise housing opportunities in the town centre and around Maylands, and use the Council's assets and those of its partners to promote housing. A housing programme from 2006 2031 is then likely to deliver around 9,800 homes. The annual dwellings target, removing any allowance for windfall in the first 10 years, would be 370 dwellings. The target is a minimum which can be exceeded. Members are advised that further work in the next few months may result in current assumptions about Hemel Hempstead Town Centre being revised: housing figures might then need to be adjusted.
- 12. Options 2 *adds* to Option 1. It includes local development allocations: choices about these allocations would affect the overall housing figure for Option 2. The highest level that is recommended for consultation is as follows:
 - annual minimum target 430 dwellings per year
 - overall programme total 11,400 (2006-2031)

The local allocations would fulfil a number of purposes:

- they extend the character and nature of housing supply, particularly for family housing;
- they provide local affordable housing;
- they can be planned in line with infrastructure capacity, particular primary schools which have low change thresholds;
- they can be used to address local infrastructure deficits; and
- they help maintain local population and viability of settlements away from Hemel Hempstead

Local allocations are extensions to defined settlements. They are separate from the two strategic sites at Egerton Rothesay School/Shootersway, Berkhamsted and Hicks Road, Markyate which are in the respective urban areas and support each place strategy. If selected, local allocations would be defined in a subsequent development plan document, and be subject of further local engagement about design and layout.

13. Particular choices in Option 2 take account of documents from the Emerging Core Strategy consultation and the systematic options appraisal that has been undertaken.

For example, options at Shootersway, Berkhamsted and Dunsley Farm Tring have been dropped. [In addition the dwellings capacity of the strategic site at Egerton Rothesay School and adjoining has been reduced by 15%]. Options for Hemel Hempstead were not included in the Emerging Core Strategy consultation, because the Council was waiting for the resolution of the Hemel growth issue in the East of England Plan. At West Hemel Hempstead, smaller and larger variants have been included for consultation.

- 14. The Option 1 and 2 housing levels fall between:
 - the RSS Review Scenario 1 level of 310 dwellings per annum; and
 - the nil net migration level of 500 dpa.

The sustainability appraisal assesses Options 1 and 2 and the nil net migration level.

15. The nil net migration level of growth is most unlikely to be achieved without growth to the east of Hemel Hempstead. St. Albans Council is considering whether to include the option of an urban extension at Wood End Farm in their next Core Strategy consultation. The Borough Council would have the opportunity to comment during that consultation. If planned properly, a new neighbourhood would have benefits for the town, particularly by supporting the regeneration and growth of Maylands Business Park.

Policy Wording

- 16. The Emerging Core Strategy proposed a policy direction on housing, economic and environmental matters. The policy direction has largely been supported. The Consultation Draft Core Strategy puts that into precise wording. Feedback from the Summer stakeholder consultation (see Appendix 1) is incorporated into the policy and supporting text.
- 17. The only specific policy in the Emerging Core Strategy related to provision for Gypsies and Travellers. This has been subjected to particular scrutiny and the argument that Gypsies and Travellers should live on one very large site (from a campaign by Berkhamsted residents to prevent development on Shootersway). The draft policy is considered sound, and officers have brought the policy forward into the Core Strategy format. This has required minor editing changes, including the removal of reference to strategic sites (the policy was drafted when the East of England Plan would have required several large, strategic, greenfield sites).

Other Matters

- 18. The consultation draft is based on the best evidence available. Local allocations in Housing Option 2 are indicative. In the context of the consultation it would be helpful to test the following issues further:
 - the omission of a short road link between New Road and Springfield Road, Berkhamsted – and whether the inclusion of a housing option at New Road could fund the link, if it was retained. A report is expected from the local highway authority soon suggesting the link be dropped.
 - the inclusion of a wider option at Hanbury's, Berkhamsted to support the long term retention of the British Film Institute.

19. The jobs target is indicated as *up to* 18,000 jobs (2006 – 2031). This may ultimately need to be revised in the light of the selected housing option.

MOVING TO CONSULTATION

- 20. This report is being presented to Cabinet and Strategic Planning and Environment Overview and Scrutiny Committee before full Council on 29 September 2010. Further editing changes are possible, and it is therefore recommended that delegated authority be given to the Assistant Director, James Doe, in consultation with the Portfolio Holder for Planning and Regeneration.
- 21. Preparing the consultation will take around a month. The focus should be on matters which have not been addressed before the housing options, local development opportunities at Hemel Hempstead and policy wording. There will be both formal and informal elements (consistent with the Council's consultation policy set out in the Statement of Community Involvement). Dacorum Digest will be used to help broadcast the consultation. On line comments will be encouraged. Key issues will also be raised through dialogue with representative focus or workshop groups. The normal forms of direct communication will also be used.
- 22. The consultation on the Core Strategy is another opportunity to discuss the benefits of new housing with local communities. This is particularly pertinent in the light of:
 - (a) the Chief Planner's letter (6 July 2010), which states:
 - "Local planning authorities should continue to develop LDF core strategiesreflecting local people's aspirations and decisions on important issues such as climate change, housing and economic development."
 - (b) the Minister for Housing and Local Government's letter (9 August 2010) which states in reference to the introduction of the New Homes Bonus:
 - "Local communities that choose to go for growth both now and in the future will receive substantial extra funding for doing so."
- 23. Without repeating the past extensive and innovative place workshops, focus group discussions, Citizen Panel surveys, stakeholders' discussions and public consultation, messages from Government suggest that the benefits of growth should be discussed locally. Where growth is supported by the Council the Government will provide additional financial incentives which can be invested locally, for example in infrastructure or improved services. This will add to a more systematic use of planning obligation tariffs or similar, which would be taken from the value of development (normally housing) and also used to help provide relevant infrastructure.

Summary of responses and changes to Working Draft Core Strategy¹

(a) Informal Stakeholder Consultation July 2010

Organisation	Summary of Response	Action
Matthew Wood, Senior Planning Officer, Hertfordshire Property, Hertfordshire County Council	 Berkhamsted Spatial Strategy: Amend local objectives and para 22.4 to refer to 'Primary age schools' rather than 'first schools.' Amend map to show correct educational zones. Soften wording of para 22.4 to say that 'It would 	 Refer to 'Primary age schools' rather than 'first schools.' Check location of broad educational zones with HCC. Amend para 22.4 accordingly.
Natalie Blaken, Head of Planning, EEDA	be prudent to plan for' Strategic Objectives: 1. Support the main thrust of the Council's approach to planning for economic development and the four objectives set out. These will place the borough on a sound footing moving forward. Creating Jobs and Full Employment: 2. Given the revocation of the East of England Plan	 Support noted. Policy CS14 refers to 'up to 18,000
	 (RSS) the Council should be satisfied that there is sufficient sound local evidence to justify Policy CS14. Sub-regional work has identified the importance of the Maylands Business Park to the borough and wider sub-region. 3. Supports the priority given to the regeneration of the Maylands Business Park and its transformation into a sustainable, well-connected 	additional jobs' in order to reflect current uncertainties. Add additional justification for the jobs target to the background text. 3. Support noted.

¹ Working Draft of the Core Strategy - as considered by Cabinet on 29th June 2010.

- green business park, offering a high standard of accommodation.
- 4. Provide more comprehensive design guidance for the area using design principles set out in the masterplan.

5. Stress the importance of the green energy centre and renewable energy sector, and environmental goods and services supply chains.

Providing for Offices, Industry and Storage:

- 6. Supports the approach of retaining existing supply and choice of employment sites unless there is clear evidence to suggest otherwise.
- 7. Welcomes the recognition given to spatial and quality issues relating to supply.
- 8. Highlight the importance of differentiating the offers of the town centre and Maylands to ensure they are complementary.
- 9. Supports the inclusion of a jobs target. However, the plan must set out how the significant step change in employment growth will be achieved and whether the identified employment areas can deliver this scale of change.

- 4. Add section setting out the key development requirements for the Maylands Business Park to the Hemel Hempstead Place Strategy: include a map illustrating the urban design areas identified within the Maylands Masterplan and refer to how this employment space complements that within the town centre.
- The green energy centre is already referred to within para 11.11. Insert additional text on the other matter.
- 6. Support noted.
- 7. Support noted.
- 8. Agreed. Include clear reference in the text to the need for provision in the two locations to be complementary.
- 9. Noted. Justification for jobs target to be added.

Chris Shaw, Senior
Network Planning
Manager, Highways
Agency

General:

- 1. Document is set out in a logical manner and is easy to read.
- 2. References to the East of England Regional Spatial Strategy (RSS) need removing, although its revocation should be referred to briefly.
- 3. Highways Agency is content with the statement previously agreed for inclusion within the Infrastructure Delivery Plan in terms of its reference to the need for further modelling work of the strategic road network.
- 4. Minor typographical errors etc highlighted. *Specific Comments:*
- 5. Para 3.18 further detail regarding commuting patterns required.
- 6. Paras 4.14 and 11.3 reference to location of Maylands Business Park required through cross-reference to map on page 4.
- 7. Para 4.16 suggest inclusion of the challenge of delivering sustainable transport links to mitigate against the impact of car based travel.
- 8. Policy CS2 reference to the fact that the location of all development must reduce carbased travel.
- 9. Para 9.7 include reference to PPG13 to confirm when a transport assessment and travel plan

- 1. Support noted.
- 2. Delete references to the RSS and amend text as appropriate.
- 3. Noted. Text will be included within final version of infrastructure Delivery Plan and referred to in Infrastructure section of Core Strategy where appropriate.
- 4. Noted.
- Add additional information regarding commuting rates and patterns to the Borough Portrait.
- 6. Ensure the document includes early and clear reference to the location of the Maylands Business Park.
- 7. Add reference to the need to ensure delivery of sustainable transport links to mitigate against the impact of car based travel to Challenge 6.
- 8. No change. There is already a cross reference to Policy CS8, which covers the principle of reducing car-based travel.
- 9. No change. Reference to specific PPGs and PPSs has been

araa	2	roguiromont
aıta	а	requirement.

- 10. Para 9.8 refer to parking standards.
- 11. Policy CS9 include the following paragraph in some form: 'In general terms, Government policy is no longer to attempt to cater for unrestrained road traffic growth. In working with developers, the Highways Agency will expect to see proposals that include ways to reduce the traffic impact of the development. Developers can no longer expect that all the traffic they might produce will be allowed without restraint. This would lead to ever-increasing congestion, which poses a threat to economic growth and the environment. Whilst the Highways Agency will work with all relevant stakeholders and developers in order to promote development, it will need to take into account the impact that such growth will have on the ability of the strategic road network to function effectively.'
- 12. Para 16.20 text may require amending in the light of the recent Government announcements regarding the 'Building Schools for the Future' programme.

- avoided as these are subject to change. The Council is advised to avoid repeating national policy. Reference to PPG13 should therefore not be included within para 9.7 to ensure consistency of approach.
- 10. No change. The fourth bullet point already refers to the issue of private car parking.
- 11. Add reference in paragraph 9.3 to the fact that national policy is no longer aimed at catering for unrestricted road traffic growth. Other principles already included within policy, or national guidance, which is not repeated.

12. Amend references to the BSF programme within para 16.20 following advice from the Education Authority (Hertfordshire

	 13. Hemel Hempstead Place Strategy – queries how 5,800 new homes can be accommodated within the existing town boundary. 14. Policy CS34 – supports the approach set out in the policy on Infrastructure and Developer Contributions. However, the policy set out in the Developer Contributions SPD must accord with ODPM Circular 05/05: Planning Obligations. The Highways Agency is content to work with the Council in drafting the SPD. 13. This will be set out within the detailed Housing Programme, verified in the Site Allocations DPD. 14. Agree that the Developer Contributions SPD must accord with Government Circular. No change required. 	I
Robert Middleton, Development Plans, The Planning Inspectorate	 The Planning Inspectorate does not assess DPDs at the Regulation 25 stage so it is not possible to give specific advice as to whether the next consultation should be a further Regulation 25 or a Regulation 27 (Pre-submission) consultation. Suggests considering whether previous consultation in June 2009 together with the current 'informal consultation' meets all the conditions of Regulation 25. If the decision is taken to proceed to Regulation 27 the document needs to be sound and have sufficient supporting evidence. The decision is ultimately down to the Council. 	net
Paul Fellows, Principal Adviser – Development and Infrastructure, Beds, Herts and Luton Team, Government Office for the East of England	No longer able to offer formal comments due to recent Government announcement regarding abolition of Government Office Network. 1. Noted. 1. Noted.	

Colin White, Planning Officer, Chilterns Conservation Board

 If the Countryside Spatial Strategy is to include a specific policy on the Chilterns Area of Outstanding Natural Beauty (AONB) then the vision and objectives should refer to the need to 'conserve and enhance' the landscape and specifically mention the AONB. Even if a policy is not included, these changes should still be made for consistency of approach with other sections.

- 2. Refer to 'sustainable tourism' rather than 'green tourism' in the local objectives for the countryside.
- 3. References to the design guide and associated technical notes are welcome and appropriate.
- 4. Para 27.15 no specific good practice note relating to 'horseyculture' is proposed. Advice will instead be included as a Planning Policy of the Conservation Board, and advice is already provided through the Landowners Pack.
- 5. Recognition given to the importance of chalk streams and tranquillity is welcomed.

- 1. The Countryside Place Strategy is not intended to include a policy relating to the AONB. This is included within the 'Looking After the Environment' theme chapter (Policy CS24). More detailed guidance regarding development within the AONB will be provided through subsequent Development Management policies. Until then, the existing Local Plan policy is saved. Include reference to the need to conserve and enhance the Chilterns AONB as a local objective and refer to the Council's ongoing support for the Chilterns Conservation Board within the delivery text.
- Amend local objective to refer to 'sustainable tourism' for consistency with Policy CS14 and section 14.
- Support noted.
- 4. Delete reference to the Good Practice Note in para 27.15 and refer instead to the Landowners Pack.
- 5. Support noted.

Chris Bearton, Forward Planning Unit, Hertfordshire County Council

- 1. Review references to the Regional Spatial Strategy (RSS) and Key Centre for Development and Change (KCDC) designation.
- 2. Para 4.17 could also make reference to design of new development helping adapt to climate change, as climate change is a consistent theme throughout the document.
- 3. Questions whether a housing growth option should be included that explores meeting all projected household growth, including migration. Notes it is a requirement of SA/SEA to identify and assess all reasonable alternatives.
- 4. Need to ensure clarity over how Option 2 figures are presented as in some cases they seem to be nil-net migration and in others as the natural growth of the existing population.
- 5. Justification may be required for the 2006-2031 plan horizon in light of loss of RSS and absence of the need for a strategic Green belt review. Suggests a recalibration to 2011, with a 15 year time horizon. This can have significant implications for the residual 'to find' sites.

- 1. Delete references to the RSS as appropriate and replace reference to the KCDC with an alternative term which reflects the approach to regeneration and urban renewal within the town.
- 2. Agree. Add reference to sustainable design to the second sentence.
- The natural growth option is being considered as part of the SA/SEA process. It will be referred to in the Consultation Report.
- 4. Ensure references to the basis for Option 2 figures are consistent throughout the document.
- 5. The 2006-2031 timeframe is considered appropriate for a number of reasons. The Council is obliged to have a 15 year land supply from date of adoption. If adopted in 2012, this gives an end date of 2027. Using 2031 provides a small 'cushion' and also provides the local community and developers with greater certainty over expected future growth and change. 2006-2031 is also the

- 6. Chapter 10 approach to 'Using Resources Efficiently' is supported.
- 7. Approach to reducing carbon emissions needs clarifying in places and could benefit from inclusion of an 'energy hierarchy' as set out within the London Plan. This would require developers to reduce energy demand first, before considering carbon compliance and finally the offset fund.
- 8. Table 11- how will C0₂ reductions for development outside district heating opportunity areas be achieved?
- Operation of Carbon Offset Fund needs to be discussed further with other Hertfordshire Authorities. Potentially inline with recent announcements on Community Energy Funds.
- Policy CS30 questions whether tree planting is the best way to achieve carbon reductions. Notes that it is not a suggested allowable solution in the Community Energy Fund. Strategic decentralised heat/CHP systems should be the focus.
- 11. Policy CS28 Hard to see how a renewable energy target will be defined for the Borough based on current evidence, as the RSS target

- timeframe used for the majority of technical work and previous public consultation.
- 6. Support noted.
- 7. Include a simple 'energy hierarchy' within the supporting text.

- 8. Amend the text to clarify that outside the District Heating Opportunity Areas, developers will be expected to comply with Part L of the Building Regulations.
- 9. Continue discussions with colleagues at Hertfordshire County Council and adjoining authorities regarding the operation of a Carbon Offset Fund.
- 10. Amend Policy CS30 to reflect latest Government advice regarding the Community Energy Fund.
- 11. Amend Policy CS28 to delete references to renewable energy targets for the Borough. Consider

	was for the entire region and Hertfordshire's contribution was not expected to be significant.	commissioning further technical work to enable these to be included within subsequent DPD(s) or SPD(s).
Elizabeth Rushton, Principal & Chief	 Considers it to be a very comprehensive and well articulated document. 	1. Noted.
Executive, West Herts College	Borough Vision could refer to a new college campus.	2. The new college facility forms part of the town centre regeneration already referred to within the vision. As it will be a replacement, rather than completely new facility, it is not considered appropriate to refer to it more explicitly.
	3. Para 11.8 – refer to the role of a modern college in supporting lifelong learning, skills development and retraining of the work force.	3. Agreed that the college will have a potentially important role in helping deliver lifelong learning, skills development and training for the local workforce. Add reference to the college as a delivery partner under Policy CS14.
	 Hemel Hempstead Spatial Strategy – include reference to a college facility for lifelong learning within the vision. 	No change required. The vision for the town centre already includes reference to a new college.
Herts & Middlesex Wildlife Trust	 Provide a definition of (County) Wildlife Sites Amend Policy CS26 to refer specifically to the refusal of development that would damage or destroy a wildlife site or key habitat. 	 Add definition to Glossary No change. This more detailed element of policy is contained in Local Plan Policies 102 and 103 and will continue to apply. It is however important to remember the point when preparing the

		Development Management DPD.
Herts County Council - Land Management Group	 Enhancing the Natural Environment The Landscape Character Assessment (LCA) was prepared in conjunction with HCC and the Chilterns Conservation Board, not simply DBC. 	All references will be appropriately stated.
	Character assessments included evidence of community perceptions and comment.	2. Amend text accordingly.
	3. If Boarscroft Vale is to be identified as a special landscape area, reasons should be given.	3. Noted.
	Historic landscape characterisation has a lower status than the LCA.	4. Noted.
	5. Merge paras 17.6 and 17.7 to avoid confusion.	5. Agreed.
	Policy CS24 could refer to 'Building Futures' as supplementary advice.	6. No change. The key reference to Building Futures is given in the Overall Strategy under design (and applies as relevant everywhere).
	7. Clarify the use of the terms, landscape quality and sensitivity, which are in Policy CS25.	7. Refer to condition being improved rather than sensitivity.
	8. Consider referring to the following items which appear to be omissions: a. 'Living Landscapes' areas of high biodiversity;	8. No change except where stated below: a. Key biodiversity areas are already covered, e.g. on Map 3.
	 regional landscape typology, which contains a methodology for assessing landscape; sensitivity to development scenarios; 	b. This will be useful in preparing Green Infrastructure Strategies.
	c. trees; d. residential character areas; and	c. Include reference.d. This is covered in Section 10.
	e. improving landscape character benefitting ecology.	e. Give stronger reasons in the text for improving landscape character.
	9. Use a standard definition for green infrastructure.	9. Insert PPS12 definition in the

		Glossary.
	Countryside Strategy	Glossary.
	10. Check key to Fig 25 and show out of district links.	10. Agreed.
	11. Move most of section to Green Infrastructure.	11. No change. Green infrastructure runs through town and country, and has an importance of its own. The countryside is described as a place and the countryside strategy brings together all environmental, economic and social influences.
Herts Biological Records	Key Diagram	
Centre	 Check the Special Area of Conservation boundary. 	 Agree, and make corrections if necessary.
	 Include Sites of Special Scientific Interest, or if not include within the green infrastructure strategy and action plan. 	2. No change. However, SSSIs and other green infrastructure will be fully covered in the GI strategy and action plan.
	Strategic Objectives	·
	 Add "to support management activities that actively contribute to delivery of environmental objectives. 	3. The principle of active management to deliver environmental objectives is fully recognised and will be brought out in the text and delivery schedules.
	Enhancing the Natural Environment	
	4. Boarscroft Vale is part of the Beds and Cambs Claylands. Mixing local and national landscape character terminology is inconsistent (but no opinion is offered).	4. Noted.
	Development imposes alien features on the landscape. Hence it cannot help conserve and enhance the landscape.	5. Noted. The approach taken in policy SC25 is a positive one. The second paragraph in the policy

6.	Use PPS12 definition of green infrastructure, or
	otherwise explain the term better.

- 7. Use definitions of key biodiversity areas on Map 3 that are in the Herts Biodiversity Action Plan (HBAP).
- 8. Figure 15 shows relative importance of biodiversity / geology designations, not their geographical scale.
- 9. Refer to key biodiversity areas in Figure 15: although not formally designated, it is appropriate to recognise their importance.
- Two more regionally important geological sites Tring Park and Bourne Gutter – may be identified.
- 11. Refer to "local" sites (of biodiversity interest) in para 7.17 in the context of informal designations
- 12. Designating new local nature reserves does not necessarily increase natural greenspace.

13. The aspiration to address the increasing fragmentation of habitats is supported. Further

- explains how the Council will take forward this principle.
- 6. Include in the Glossary. Taken together paragraphs 17.10-17.12 provide a simple explanation. Map 3 provides a visual check that green infrastructure extends throughout the countryside.
- 7. Amend definitions.
- 8. Amend Figure accordingly.
- Insert text above County Wildlife Sites and include footnote reference.
- 10. Noted.
- 11. Amend text accordingly.
- 12. Noted. Designating new local nature reserves will increase the amount of natural greenspace where new land is involved.

 However for sites where an existing open space is used, it will ensure a particular style of management.
- 13. Planning can help support the key delivery mechanisms listed below

guidance should be offered.	para 17.21. A green infrastructure
	strategy and action plan, supported
	by developer contributions, will
	help. Add to delivery list:
	"encouraging the take up of agri-
	environment grants through
	partners".
14. Refer to the term "living landscapes" in the	14. No change. The term has no formal
context of wider landscape and biodiversity aims.	status. The principles underpinning
	co-ordinated landscape and
	countryside management are
	accepted. The delivery
	mechanisms will remain those
	listed below para 17.21 and will
	embrace the initiatives of our
	partners.
15. Orchards could be included within purposes for	15. Noted. Reference to orchards will
tree and woodland planting in para 17.20.	be made in para 7.17. Woodland
	includes orchards in the context
	referred to.
16. Delivery mechanisms could usefully refer to land	16. Amend accordingly.
management.	
17. Amend monitoring indicators:	17. Amend accordingly.
a) no net loss of recognised wildlife habitat	
b) refer to "management" of wildlife sites.	
Place Strategies – Vision Diagrams	
18. Showing wildlife corridors: the major (red)	18. Amend the diagrams accordingly.
corridors in the Urban Nature Conservation Study	Include within the supplementary
could be shown on the Vision Diagrams. All	Green Infrastructure Strategy and
wildlife corridors should be shown in the	Urban Design statements.
supplementary Green Infrastructure Strategy.	

	Countryside Strategy	40.0
	The vision should refer to grasslands and woodlands, which produce timber.	19. Amend the strategy to refer to these points.
	20. How can development support changes in agriculture? Examples of support to farm shops or abattoirs are suggested.	20. Refer to landscape management in the vision and local food initiatives and facilities in 27.10.
	21. There should be an objective relating to local food production.	21. Include as part of the support to the rural economy. Also include within the vision.
	22. Support objective to protect tranquil parts of the countryside. Will tranquillity be defined? Does it include avoidance of light pollution.	22. No change. Tranquillity should be definable as part of the work our green infrastructure strategy. Policies on light pollution are saved (and continue to apply).
	23. Light intrusion is more than a factor of main transport routes.	23. No change. The point is accepted and will be tackled through further work and detailing of overarching policy in subsequent documents.
	24. There are a range of issues associated with rivers. The profile of all of them should be raised.	24. The principle is accepted. Para 19.26 onwards covers water management more fully already. Insert additional text in para 27.7 to refer to water management.
	25. Make the link between land management (i.e. function) and the delivery of environmental assets (e.g. wildlife habitats).	25. Amend text para 27.14 to refer.
John Allan, Town and Parish Council representative on the LSP Support Group	 Excellent document. Some clarity regarding the future uses that would be appropriate on the Akeman Street site in Tring would be helpful for clarity, together with an indication of how access problems will be 	Support noted. Amend para 23.7: detailed requirements for Akeman Street (and Heygates Mill) will be set out within the Site Allocations DPD.

	overcome.	
CABE	Good document. Take it to the next level and make it an exemplar Core Strategy.	1. Support noted.
	 Recognise the borough's sub-regional function and its role in relation to London. Link references to the pockets of deprivation more clearly to the overall strategy. 	 Add text to Borough Portrait to cover wider functional relationships. Amend para 3.23 of the Borough Portrait to cross-refer to the fact the Hemel Hempstead has the most deprived wards and this is a factor why the town is the focus for regeneration activities.
	4. Explore the future role of the Green Belt by highlighting its leisure and tourism opportunities for communities inside and outside the borough. Outside the borough.	4. No change. The role of leisure tourism within the Borough is already covered, within the countryside section of the 'Sustainable Development Strategy' theme, the tourism section of the 'Strengthening Economic Prosperity' theme and the Countryside Place Strategy. The wider role of the borough's countryside can be highlighted in the changes to be made under point 2 above. No further changes required.
	5. Be more explicit about how the Core Strategy will make things happen.	5. Already covered within the sections on Delivery and Implementation. However, include an explicit reference within the new 'Summary' section which will be added to the front of the document.

- 6. Include stronger reference to the role of Hemel Hempstead and the challenges faced by the town within the Borough Portrait.
- 7. Consider undertaking an energy mapping exercise of the borough.
- 8. Clarify where the main transport hubs are within the Borough.
- 9. Strong sections on design and community infrastructure.
- 10. Document successfully integrates work done by the LSP on the Community Strategy.
- 11. Link the vision more strongly to the rest of the document especially the Place Strategies.
- 12. Policies are well explained, but think about how the policy can be delivered in ways other than through planning i.e. through the third sector.
- 13. Ensure that information gained through the Place Workshops is fully reflected and that there is a strong link in the Place Strategies between problems and actions and that these are explained.
- 14. Make it clear how planning will play a role in the borough's low carbon agenda.

- 6. Add additional text to para 3.12.
- 7. This work has already been carried out as part of the AECOM study on climate change. An Energy Opportunities Plan is included as Map 4.
- 8. Add reference to main transport hubs to para 3.19 of Borough Portrait. The Hemel Hempstead Place Strategy already refers to improvements to key bus and rail interchanges within the town.
- 9. Support noted.
- 10. Support noted.
- 11. Check text and strengthen links where appropriate.
- Support noted. Add reference to other delivery mechanisms where appropriate.
- 13. Noted. Check to be carried out and any necessary changes made.
- 14. This is already covered in paras 11.9-11.12, with cross references to the sections on sustainable design

		and construction. Add additional reference to the AECOM study's conclusions regarding the potential role of Maylands to the supporting text. Add reference to the proposed Local Development Order for the Business Park to the delivery list.
	15. Document is very easy to read and the authors have clearly taken an inclusive approach.	15. Support noted.
	16. Ensure that the 'Themes' sections are sufficiently spatial.	16. Noted.
	17. Support inclusion of Key Diagram at the front of the document.	17. Support noted.
	18. Make even greater use of maps and illustrations in the final version, to help highlight key points and issues.	 Noted. The use of graphics will be extended in the publication version of the document.
Andrew Wright, Planning Officers Society (Critical Friend)	 Context/General The RSS no longer sets the strategic planning framework. Remove references to RSS and bring relevant RSS policy into the Core Strategy. 	Review text of Core Strategy to remove references to the RSS, and bring relevant RSS policy into the document along with associated evidence.
	2. Need to demonstrate a decision audit trail for the Core Strategy either as a separate document or within the draft plan.	Noted. An audit trail will be provided.
	3. Include a concise summary of strategy.	Insert summary next to the key diagram.
	4. Review key policies to ensure they provide the full strategic picture.	Noted. No particular action required.
	Review supporting text to convert appropriate statements into full policy.	Noted. The principle will be adhered to during all editing.

- 6. The Borough portrait could say more about what makes Dacorum distinctive, e.g. Hemel Hempstead's New Town origins.
- 7. Should the strategic objectives be more specific?
- 8. Should the common local objectives be included with the strategic objectives?

Promoting Sustainable Development

- 9. As a consequence of the removal of references to the RSS as setting the strategic framework, the settlement hierarchy in para. 8.9 should be framed as policy and given local justification.
- 10. Re-visit Policies CS1 and CS2 to remove material that expresses purpose rather than policy.
- Check use of terminology contingency and reserve sites; strategic sites and allocations – to avoid any confusion.
- 12. The sequential test for the selection of sites should be abandoned, because there is no guiding policy in the RSS any more.

- 6. Agreed. Amend text accordingly.
- 7. No change. The objectives develop those in the community strategy and are sufficiently detailed.
- 8. No change. The local objectives are best located with the place strategies. The distinction between common and specific, place objectives will be clarified.
- 9. Amend Policy CS1 to refer to the settlement hierarchy.
- 10.Noted. It is considered that the policies properly reflect policy.
- 11. Agreed. In particular amend wording of section headed, 'Designating Sites', and Policies CS2 and CS6.
- 12. Amend Policy CS2. It should apply to the initial selection of sites in subordinate local development documents and to the phasing of any new extensions to defined settlements. The sequential test is important in the context of encouraging sustainable development.

Strengthening Economic Prosperity

- 13. As a consequence of the removal of references to the RSS as setting the strategic framework, the introduction to section 11 should be framed as policy and given local justification.
- 14. Merge this section with Policy CS13 and make clear the extent of development proposed for the town centre.
- 15. Policy CS15 does not state what the minimum supply of Bi land should be.

Supporting Retailing and Commerce

 Policy CS16 should be re-presented as a Dacorum retail hierarchy in the absence of the RSS.

Providing Homes and Community Facilities

- 17. Remove reference to the "sequential approach" in controlling housing releases in the Core Strategy.
- 18. The Strategic Housing Market Assessment is not very conclusive on the mix of dwellings to be provided: this affects Policy CS18 and Table 9.
- 19. Can Policy CS19 on affordable housing set the threshold and proportion for larger sites now?
- 20. Policy CS23 on social infrastructure does not set

- 13. Remove reference to the RSS.
- 14. Amend section 11 and Policy CS13 accordingly, and ensure it clearly sets out proposals for the town centre.
- 15. No change. The policy indicates the minimum supply of land and additional floorspace to be provided. The policy reflects the available evidence.
- 16. Amend policy and text accordingly.
- 17. Amend text to refer to the application of the sequential approach to the selection of local allocations.
- 18. Noted. No change.
- 19. Refer to additional work being undertaken to inform policy, particularly in connection with local variations in policy. This must relate to need and viability rather than size of site.
- 20. Noted. No change.

out any particular requirements.

Places Strategies

- 21. Treat all of this section as policy.
- 22. More should be included on the strategy for Maylands and the East Hemel Hempstead Area Action Plan. This will set the key parameters and planning principles for this part of Hemel Hempstead.

Implementation and Delivery

- 23. Ensure that dependencies between development and particular elements of infrastructure are explained: state whether there are 'showstoppers' in relation to infrastructure – it appears there are none.
- 24. The Council should continue to develop its infrastructure delivery plan in collaboration with the providing agencies, and with a view to bringing forward a levy or tariff (on development) depending upon the final policy of the Government.

- 21. Agreed. Clarify text accordingly.
- 22. Agreed. Further text and policy direction based on existing work, including the Maylands Masterplan, will be included.
- 23. Include references to the Infrastructure Delivery Plan work in the 'Implementation and Delivery' chapter.
- 24. Noted.

Dacorum Borough Council Responses

David Pickering, Housing
Enabling Officer, Dacorum
Borough Council

- 1. Para 15.37 delete reference to key worker housing, as this is no longer specifically identified.
- 2. Supports content of paragraphs 15.38-15.40 regarding affordable housing provision.
- 3. Policy CS19 refer to threshold of % balance of rented to social.
- 1. Delete reference to key workers from para 15.37.
- 2. Support noted.
- 3. Policy CS19 already refers to the requirement for a minimum of 75% of affordable housing units provided

			to be essial vented
NO IN NO IN IN IN	_	0	to be social rented.
Vicki Nash, Home Energy	1.	Overall a very good document.	1. Support noted.
Conservation Officer,	2.	Carbon Offset Fund would be of great assistance	2. Support noted.
Dacorum Borough Council		in financing energy saving measures in existing	
		housing.	
	3.	Refer to 'Joint working with the Council's Energy	3. Add reference to joint working with
		Group.'	the Council's Energy Group to the
			delivery section under Policy CS30.
			4. Consider the potential of these
	4.	If the Carbon Offset fund was to be extended to	organisations as future delivery
		other authorities, reference could also be made	partners.
		to the Hertfordshire Environmental Forum and	
		Carbon Action Network East.	5. Noted. Indicators to be amended
	5.	Data for monitoring energy savings in the existing	as appropriate.
		housing stock is available.	
Julia Hedger, Interim	1.	Suggests a further strategic objective be added –	Incorporate within strategic
Group Manager – Housing		'To promote and develop sustainable mixed	objectives.
Strategy, Dacorum		communities in the Dacorum area.'	
Borough Council	2.	Delete references to the Regional Spatial	2. Delete references to the RSS
		Strategy, or mention it in the past tense.	throughout the document.
	3.	Remove or clarify the justification for greenfield	3. The draft Core Strategy is intended
		development.	to provide two levels of housing
			growth for the public and
			stakeholders to consider, as the
			Council is required to test
			reasonable alternatives. One of the
			options can be accommodated
			within existing settlement
			boundaries. The other cannot. The
			Council will choose their preferred
			option in the light of the results of

			this consultation and other information available to them, with
			the chosen option being taken
			forward to the formal Publication
	1	Dara 15 21 on housing mix add reference to the	stage. 4. Add reference to the Affordable
	4.	Para 15.31 on housing mix – add reference to the fact that further details will be available in the	Housing SPD in the delivery list and
		Affordable Housing SPD i.e. in terms of the	refer to the range of issues that this
		provision of extra care housing and key workers.	SPD will cover. Reference to
			dwelling mix is already included in
			relation to the Development Management DPD, detailed
			masterplans and the Council's
			Housing Strategy listed within this
	_	Dara 15 41 montion that the preferred viability	delivery section.
	Э.	Para 15.41 – mention that the preferred viability toolkit is the HCA toolkit.	It is not considered appropriate to specify particular viability toolkits
		toomin to the right toomin	within the Core Strategy as these
			may change over the lifetime of the
			plan. Consider reference to this issue within the Affordable Housing
			Advice Note, which can be regularly
			updated.
	6.	Para 15.43 – requires reference to detail being	6. Cross-refer to the Affordable
		included within the Affordable Housing SPD.	Housing SPD where appropriate within the text.
	7.	Should Policy CS19 include any reference to	7. The reference will depend on the
		greenfield development?	housing option chosen. See
	0	Po more specific ever the % figures is 25% for	response 3 above.
	8.	Be more specific over the % figures i.e. 35% for affordable housing and 40% on larger sites.	No change. The policy needs to remain sufficiently flexible to
<u> </u>		and asset housing and 1070 on larger officer	. ca cameroring nombre to

	9. Be clear on tenure – target of 75% rented and 25% intermediate.	respond to different circumstances. Specific percentage requirements for larger sites can be tested and established through the Site Allocations DPD. 9. No change. As above, the policy needs to retain sufficient flexibility to respond to different circumstances. Policy CS19 already requires a minimum of 75% of the affordable housing units should be for social rent.
	10. Clarify that the formula for calculating financial contributions will be available in SPD.	Add short reference to approach within delivery section.
Lizzie Staincliffe, Environment and Sustainability Officer, Dacorum Borough Council	 Overall a very good, thorough document. Para 19.1 – notes omission of a bullet point relating to reducing water consumption. 	 Support noted. Add reference to reducing water consumption. Minimising water consumption is also covered in para 19.8 relating to sustainable design and construction and in Policy CS29 itself. The list in para 19.1 is not intended to be exhaustive.
	3. Para 19.10 – there is no wind turbine at Cupid Green Depot, only solar hot water.	3. Amend text accordingly.4. Add reference to text.
	4. Para 19.19 – orientation of buildings also assists with reducing energy from lighting as well as heating and cooling.	4. Aud reference to text.
	5. Policy CS30 – questions whether the Carbon Offset Fund could also be used for cycle or alternative transport infrastructure.	5. The wording of Policy CS30 will be reviewed in the light of Government announcements on the proposed new 'Community Energy Funds.' [In

		d
		the event, no change. However this is an ongoing commitment.]
	6. NI188 has been changed from a target of Code	6. Update target relating to NI188.
	Level 4 by 2011 to Code Level 2 by 2011.	
	7. Suggests monitoring indicators for Policy CS32	7. Reconsider the most appropriate
	could include the number of sites designated as	monitoring indicators for Policy
	contaminated land and the number of	CS32. [In the event, the number
	Environment Agency reported pollution incidents.	was reduced for practical reasons and simplicity.]
	8. Some minor typographical errors.	8. Noted.
	Various typographical errors and minor wording	1. Noted.
Spaces Officer, Dacorum	changes suggested for clarity and accuracy.	
Borough Council	2. Policy CS24 - suggest reference to management	2. Add 'and enhanced' to the end of
	and enhancement is added to the aim of	the first sentence of Policy CS24.
	conserving. Move the scarp slope reference to	This reinforces the Chiltern's
	the end of the development paragraph to clarify	Conservation Board's mandate to
	that the policy relates to more than just	'conserve and enhance' the AONB.
	development on the scarp line.	Move the sentence relating to the
		scarp slope to a separate second
	3. Policy CS25 – potential conflict within the first	paragraph. 3. No change. The principle is
	sentence?	elaborated in the rest of the policy
	Sentence:	and through delivery mechanisms.
		Also see response to Hertfordshire
		Biological Records Centre.
	4. Para 17.16 – clarify when Wildlife Sites list is	4. No change. Not necessary.
	updated.	
	5. Suggests swapping order of delivering and	5. No change. The order is considered
	monitoring sections.	appropriate and is used consistently
		throughout the document.

(b) Changes made to accord with the advice of the Sustainability Consultant following receipt of the draft Sustainability Appraisal

Location	Action
-	Policy coverage considered to be appropriate. No obvious omissions.
Borough Vision	Cross refer to local visions and their role.
Strategic Objectives	Delete 'by car' from the fourth strategic objective.
	Include a new / amended objective to cover the issues of healthy communities.
Policy CS2	Amend cross reference to Policy CS6 as sites are no longer listed within the policy.
Policy CS3	Refer to strategic sites under the delivery section.
Policy CS6	Amend the policy title for clarity.
	Delete the final sentence.
Para 9.3	Add reference to reducing the need to travel (by both car and non-car modes).
Policy CS8	Check wording of clause (c) for clarity. This should relate to the linking of different transport modes.
Policy CS10	Clause (g) – refer to 'protect and enhance.'
Policy CS12	Amend the location of the word 'and' as this clarifies that all clauses must be met.
Para 11.6	Ensure term General Employment Area (GEA) is fully explained within the text and/or glossary.
Para 11.12	Add a brief reference to the role of telecommunications, the internet etc.
Policy CS14	Add supporting text to justify the jobs target in the light of the lower levels of housing growth now
-	proposed.
Table 7	Provide greater clarity within the document regarding the differences between the two housing options
	and their implications for different places.
Para 16.7	Delete the words 'if they are not in the vicinity of new housing development.'
Para 17.14	Delete 'and Habitat Regulations Assessment issues.'
Policy CS28	Amend wording to better reflect available evidence and the loss of the Regional Spatial Strategy
	policy.
Policy CS29	Refer to 'impermeable' rather than 'hard' surfaces.

Para 19.36	Refer to any strategic waste sites that may be planned. Refer to minerals and waste safeguarding	
	areas.	
Policy CS31	Refer to 'impermeable' rather than 'hard' surfaces.	
	Check that the text does not repeat national policy.	
	Amend clause (e) to refer to 'Groundwater Source Protection Zones.'	
Policy CS32	Ensure policy covers air quality in areas that aren't AQMAs, but are borderline.	
	Amend final paragraph to read 'Any development proposal which would cause harm from a significant	
	increase in pollution'	
	Check that supporting text covers hazardous substances.	
Introduction to Place	Common local objectives – clarify tenth bullet point. Access to what?	
Strategies	Explain how the indicative targets for each place have been derived for the two housing options and	
	how they relate to the housing programme.	
Hemel Hempstead	Check the vision for clarity i.e. who is it we are intending to entice? Visitors or new businesses?	
Place Strategy	Clarify figures in the local objectives.	
Berkhamsted Place	Strategic Allocation – ref to a 'Green Travel Plan' rather than a 'school transport plan.'	
Strategy		
Countryside Place	Para 27.15 and local objectives – Replace 'horseyculture' with 'equine activities.'	
Strategy		

Resolution

14 September 2010 CA/134/10 Item 10	The Council be recommended to approve: 1. The draft Core Strategy for consultation; and	Richard Blackburn, Senior
Dacorum Local Development Framework Core Strategy.	 2. The authorisation of the Assistant Director of Planning, Development and Regeneration to: (a) finalise the wording of the draft in agreement with the Portfolio Holder for Strategic Planning and Regeneration; and (b) conduct the consultation so as to draw out opinions and consensus on the alternatives and policy wording in the draft. 	Manager, Spatial Planning.

Appendix 5

Supplementary Changes to the Working Draft

Appendix 5: Supplementary Changes to the Working Draft

Note: This appendix includes supplementary comment and supplementary recommendations from the Sustainability Appraisal Working Note. The supplementary comment was received late. The consultants' sustainability appraisal included more recommendations that officers had initially been advised of: hence the additional recommendations were considered as a supplement. All supplementary changes were agreed with the Council's Portfolio Holder.

(a) Informal Stakeholder Consultation July 2010 - Supplementary Comment

Organisation	Summary of Response	Action
Organisation Dacorum Heritage Trust	 Summary of Response Delivering Leisure and Cultural Facilities Additional text is suggested under Cultural Facilities to cover the following: 1. The significant amount of work done by the voluntary sector; 2. Policy to correct the inadequacy of heritage and arts facilities; 3. A new cultural centre in Hemel Hempstead to include museum and art gallery as well as performing arts venue; 4. The promotion, protection and conservation of significant heritage sites such as Berkhamsted Castle and Piccotts End Cottages, which are 	 Cover in delivery section. Noted. No change. Policy CS23 refers to the encouragement of social infrastructure, the detail of which must be agreed and implemented through other policy documents. Refer to cultural facilities (rather than a single multi-cultural facility). Include principle in para 16.22. Noted. No change. This is covered under Conserving the Historic
	Piccotts End Cottages, which are undervalued; 5. The re-evaluation of the borough's heritage sites.	Environment.

(b) Changes made to accord with the advice of the Sustainability Consultant following receipt of the Sustainability Appraisal.

Location	Recommendation	Action
Policy CS8 (b)	Consider whether the reference to Policy	Delete reference.
	CS29 is appropriate.	
Policy CS8	Consider whether a requirement for green	·
	travel plans for large development	
	schemes should be referred to,	
Policy CS8	Consider how infrastructure for cycling	Noted. No change is necessary.
	can be incorporated into new	
	development.	
Policy CS12	Consider referring to "Secured by Design"	Add security to the list of factors in the
	to complement Policies CS11 and CS13.	policy.
Policy CS15	Clarify meaning of the second paragraph	Delete paragraph.
	(referring to the employment land supply	
	being maintained).	
Policy CS16	Strengthen policy to refer to good public	Noted. No change is necessary to the
	transport accessibility. It is assumed	policy. However the sequential approach
	rather than stated that by locating retail	referred to in the policy can be expanded
	development in town centres it would be	to cover accessibility.
	close to public transport routes.	
Policy CS33	Consider measures to 'lock in' the benefits	Noted. No change is necessary to the
	of reduced traffic such as	policy. However the Town Centre Master
	pedestrainisation and demand	Plan should consider appropriate traffic
	management.	management (which is referred to in the
		policy) further.