

Name of the Respondent	Comments	Evidence Received	Change made 24/3/16
<p>Ian Richardson General Manager Box Moor Trust Centre London Road Hemel Hempstead HP1 2RE 01442 253300 IanRichardson@boxmoortrust.org.uk</p>	<p>Two Waters East APS 55.</p> <p>I would query the reference to being in or in proximity to SSSI. We also own the latter and it is Lower Roughdown Common-it is over 0.5km away and the other side of the London Road.</p> <p>I would add that sites ASP2 is directly adjacent to SSSI and ASP 1 is the next field along.</p> <p>Our Reference: HNL/3920/MS Dear Mr Richardson, Risk of flooding from rivers and the sea information for Two Waters East, TL0547905729 Thank you for your enquiry dated 15 February 2016 regarding the address above. The information on the risk of flooding from rivers and the sea in the area relating to this address is as follows: The likelihood of flooding from rivers and the sea in this area (taking into account defences) is</p> <ul style="list-style-type: none"> • Low: each year, there is a chance of flooding of between 1 in 100 (1%) and 1 in 1000 (0.1%). <p>Note - This information relates to the area that the above named property is in and is not specific to the property itself. Information Warning</p> <p>I have looked at the EA website for flood zones and I am not sure that your description is accurate. Attached is a section for the DBC Halcrow Strategic Flood risk assessment to which they usually refer me. I understood that it was functioning flood plain. (Although a more</p>	<p>Word doc of SFRA flood mapping showing Two Waters</p>	<p>Removed reference to SSSI. This is still considered to be unsuitable due to the Open Land designation.</p>

	detailed EA study is due later this year).		
<p>Julia Mountford Associate Director t: 01344 758 551 m: 0781 020 2258</p>	<p>Thank you for the opportunity to comment on Dacorum Borough Council’s Draft Report of the Strategic Housing Land Availability Assessment (SHLAA). We write on behalf of our client, W Lamb Limited who represents the owners of land holdings at Fairfield’s, Shendish Manor and Porters Field.</p> <p>This is the site referred to within Volume 2: Site Schedules, Strategic Housing Land Availability Assessment (SHLAA) 2016 Draft Report February 2016 as site reference APS54: Land adjacent to Shendish Manor.</p> <p>We understand that the SHLAA is now at the draft report stage and will help inform the Single Local Plan (incorporating the early partial review of the Core Strategy).</p> <p>The current opportunity to engage in the process relates to providing comment on the individual site assessment and ensure that the final SHLAA takes into account the correct information to ensure decisions on sites are accurate and robust.</p> <p>Site reference APS54 refers to ‘Land adjacent to Shendish Manor’. The summary information sets out, <i>‘Site contains Ancient Woodland, Unregistered Historic Park and Garden and a New area of Archaeological Significance. Site surrounds a Listed Building at Shendish Manor. Site is located within the Green Belt which may be suitable for development pending the findings of the Green Belt review and other technical work under the Single Local Plan. Only south-eastern portion of the site is suitable in order to exclude Areas of Archaeological Significance and Unregistered Historic Park and Garden. Existing golf course, hotel complex and surrounding land (allocation would exclude the hotel complex). Existing site access poor. Scale of development could support other commercial (B1) and community uses. Site viability is marginal.’</i></p>		<p>Removed reference to AAS. This is an accepted site but site area has been adjusted to exclude the golf course, plus a further 2ha for employment uses. The ‘large sites’ case study applies a 25d/h density resulting in 986 units, which is spread across the 6-10 and 11-15 year timescales.</p>

	<p>It is unclear how several of these conclusions have been made with regards to the site or what evidence they have been based upon. Relevant points are addressed in turn below.</p> <p>Green Belt The conclusions with regards the green belt designation are noted.</p> <p>Areas of Archaeological Significance It is noted that an additional part of the site has been designated through the Site Allocations DPD as being an 'Area of Archaeological Significance'.</p> <p>The Site Allocations Background Issues Paper dated June 2015 explains at paragraph 4.7 that, '<i>Areas of Archaeological Significance (AASs) are places within the Borough deemed to be of moderate or high archaeological potential.</i>'</p> <p>Paragraph 4.9 of this background paper goes onto state that, '<i>Planning policy does not necessarily prevent new development within AASs. Each application is assessed in light of its size, position and design to determine the likely level of impact on the historic environment, and what, if any, mitigation is required.</i>'</p> <p>Paragraph 4.11 then sets out that, '<i>The Historic Environment Unit has advised Dacorum that a comprehensive review of all Areas of Archaeological Significance across Hertfordshire is required. This is to ensure that all areas of known and potential archaeological interest are identified. The approach has yet to be agreed...</i>'</p> <p>Paragraph 4.13 then sets out that, '<i>As this comprehensive update of AASs will take some time to complete, it has been agreed that the Historic Environment Adviser for Dacorum would undertake an interim update for the Borough... A full update assessment will be completed in time for inclusion as part of the early partial review of the Core Strategy (proposed</i></p>		
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	<p><i>to be in the form of a Single Local Plan). This is programmed for adoption in 2017/18.'</i></p> <p>The website confirms that work on the Development Management Policies has 'not explicitly started'. The Site Allocations DPD allocates areas for which there appears no up to date policy and until there is a Development Management Document, the implementation of these policies appears reliant on the Core Strategy and saved polices in the Local Plan, which do not state that development must 'exclude' areas of archaeological significance (as is proposed in the SHLAA).</p> <p>The current policy (Policy 118 which is a saved policy in the Dacorum Borough Local Plan 1991 – 2011), that the Interactive Proposals Map refers to, includes the wording that <i>'...Where advice indicates that a proposed development will affect remains of archaeological significance or areas of archaeological potential, developers will be expected to provide the results of an archaeological evaluation as part of their planning application.'</i></p> <p>Policy CS27 of the adopted Core Strategy 2013: 'Quality of the Historic Environment' sets out that, <i>'...Features of known or potential archaeological interest will be surveyed, recorded and wherever possible retained...'</i></p> <p>As is typically the case with areas of archaeological significance this does not exclude development from areas of archaeological potential. However, the SHLAA implies that the Council will be applying a much more rigorous approach with regards the application of policy relating to archaeological potential than is currently the case.</p> <p>Given it is therefore clear that the extended area is an area of 'archaeological potential' and has neither been scheduled, nor has any update assessment to consider known and potential archaeological</p>		
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	<p>interest been completed, it does not seem reasonable for the LPA to say in their SHLAA that on the basis of the 'archaeological potential' that development should be 'excluded' from this area.</p> <p>This approach would conflict with both the adopted planning policy (which must be used in the absence of any emerging policy to directly support the Site Allocations DPD) regarding areas of archaeological significance and also the approach set out in the Background Papers and is therefore not considered factually correct.</p> <p>As a second point on this matter, the current Site Allocations DPD does not publish any policy wording alongside the Site Allocations DPD and Dacorum has not commenced work on their Development Management Policies that will be used to implement their Site Allocations DPD. This again highlights a point made in response to the Pre-Submission Site Allocations DPD that if the policy wording is not published alongside the proposed designation of the allocation, a fully considered response to the allocation is not possible.</p> <p>Unregistered historic park and garden</p> <p>The Site Allocations DPD was submitted for Examination in February 2016. Submission document reference SUB2, 'Site Allocations Pre-Submission Map Book incorporating the Focused Changes' illustrates on page 125 the extent of the unregistered historic park and garden. This reflects the significantly reduced extent of the proposed unregistered historic park and garden in accordance with our previous representation dated September 2015 in response to the Focused Changes consultation to the site allocations Pre-Submission document. As set out in those representations, the amended boundary of the Proposed Locally Registered Park and Garden is therefore supported.</p> <p>As with the Area of Archaeological Significance, clarification was sought as to how the policy approach proposed, without the accompanying policy wording to support the proposed Site</p>		
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	<p>Allocations, could be considered justified or effective.</p> <p>Access to the site The Call for Sites information submitted in March last year provided information on both existing accesses to the site and also potential access points to the site. The form also set out that, <i>'A Transport Assessment has recently been undertaken demonstrating all three access points could contribute towards accessing the site. On this basis access is not considered to be a constraint to bringing forward development.'</i> Further information on this point can be provided if that would be helpful. Notwithstanding the fact that the SHLAA site specific information relates to existing access, it is considered factually incorrect to imply that access would be a constraint to bringing forward development on this site.</p> <p>Marginal site viability It is questioned how the conclusion has been made that the site has only marginal site viability and further information on this would be welcomed. The Council has published a 'SHLAA Viability Study'. This document provides general information about viability testing, the methodology, land prices, appraisal assumptions etc. Appendix 3 is entitled, 'Residential Appraisal Results' however, it is blank.</p> <p>In order to confirm or otherwise whether this information can be considered 'factually correct' not only would a period of longer than 12 working days be needed to assess this and review this information, but also the 'Residential Appraisal Results' currently missing from Appendix 3 would be needed.</p> <p>We trust this information will be given due consideration as work on the Single Local Plan progresses and would welcome sight of any updated SHLAA summary information about the site.</p>		
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	Please do not hesitate to contact me should you require any further information or clarification about the site to help progress your evidence base for the Single Local Plan.		
Matthew Wilson Senior Planning Officer, Development Services Hertfordshire Property Postal Point CHO313 Hertfordshire County Council, County Hall, Pegs Lane, Hertford, SG13 8DN Tel: 01992 556638 Comnet/Internal: 26638	<p>Thanks for the email regarding the SHLAA update fact checking. I just wanted to check one thing with you, I notice that two of the three sites that form part of the Nash Mills education zone in the Site Allocations Plan are identified, these being:</p> <ul style="list-style-type: none"> . NM13 Former Sappi Nash Mills . KL48 Land adj. Red Lion Lane / London Road <p>Does there need to be a reference to the education zone? I'm not sure, I only mention this as HCC has an interest in these sites. There may be a very obvious reason this hasn't been mentioned such as it is not relevant to do so. Lastly and out of interest, am I correct in my interpretation that the remainder of the former Sappi site has not been put forward for development (NM13) , but the Land adj to Red Lion Lane / London Road (KL48) has been put forward?</p> <p>I will review the document in light of what HCC has said in the past and it is highly likely we will have no comments to make, I just wanted to think though the issues for Nash Mills.</p>		Changes made to both sites. Both accepted and capacity figures of 38 and 15 added in.
David Turner Premier Solicitors Direct Dial: (01234) 802 155 Direct Fax: (01234) 348 112 Email: David.Turner@Premiersolicitors.co.uk	Your email to European Land Acquisition Company Ltd for whom I act has been forwarded to me. I know of no constraints affecting development of this site on planning grounds		No change. Comments noted.
Ray Kilsby The W. R. Davidge Planning Practice	The position here remains as explained in the second paragraph of my email to you timed for 19.00 on 13th June, 2015 (a copy of which is attached for ease of reference), but I reiterate both my thanks for, and appreciation of, the update which you have so helpfully provided.		No change. Comments noted.

	<p>'At present we have no Clients with either interests in or proposals concerning residential development opportunities within the area administered by your Council. In these circumstances you may care to note that there will be no input from this Practice in response to your email, but I very much appreciate the information and update which this provides.'</p>		
<p>Michael Sheldon (on behalf of owners of Land adjacent to Blegberry Gardens) 01297445850 07714845177</p>	<p>We note and fully support the conclusions of AECOMs individual site assessment as follows</p> <ul style="list-style-type: none"> • BW33 Land adjacent to Blegberry Gardens is listed as suitable, available and achievable - reference page 53 of Draft report Volume 2 : site schedules Feb 2016 • This site is specified also in Dacorum SCHLAA 2016 Volume 4 Mapping Part 2 Page 19 Berkhamsted West • We would like to be advised what the next steps are now with regard to the Green Belt Review and to be told how land owners can participate and be consulted in this process • We have previously made comments about green belt review - see 2015 Call for sites Submission form submitted by PRP Planning March 15 (further copy attached to this e-mail) <p>Please keep us informed about timescales and input required</p>	<p>2015 Call for sites Submission form submitted by PRP Planning March 15 (further copy attached to this e-mail)</p>	<p>No change. Comments noted.</p>
<p>Mark Novelle Senior Planner Planning CBRE Ltd Henrietta House Henrietta Place London W1G 0NB DDI +44 20 7182 2423 T +44 20 7182 2000 M +44 7702 975681</p>	<p>CBRE Ltd acts as planning agent to the land owner of the site known as Land to the rear of Hill Farm, Love Lane, Kings Langley. This site has been considered as part of the Dacorum Borough Council (DBC) Strategic Housing Land Availability Assessment (SHLAA) process, managed by AECOM, under the site reference 'KL/7'. I write in response to an email dated 12 February 2016 from Francis Whittaker, Strategic Planning and Regeneration at DBC, in which comments are invited regarding the accuracy of SHLAA site information and for any clarification purposes.</p> <p>Site KL/7 is correctly identified as suitable, available and achievable, as well as within the Green Belt and subject to the on-going DBC Green Belt Review. However, it is noted that the SHLAA identifies the site as having</p>		<p>References to CA and site access have been removed.</p>

	<p>a potential site access issue and this being within a Conservation Area.</p> <p>It is not clear how the assessment has determined there to be a potential site access issue, but we do not consider this to be the case. For clarity, the existing access to the site from Love Lane forms part of the site and is within the ownership and control of the site landowner. The existing access is capable of serving residential development at the site.</p> <p>With regard to the reference to the Conservation Area (CA), it is unclear from the language used whether the SHLAA considers the whole or part of the site to be within the CA. In fact only a small part of the existing site access falls within the boundary of the Kings Langley CA. Notwithstanding this, as this only affects part of the site access and not a developable area, we do not consider the presence of the CA here to be a constraining factor.</p> <p>I would be grateful if you could please reconsider the SHLAA comments for site KL/7 in light of the above, and reflect this accordingly in the documentation. Please do not hesitate to contact me should you wish to discuss any of the above further.</p>		
<p>Martin Friend director</p> <p>Vincent and Gorbing Sterling Court, Norton Road, Stevenage, Hertfordshire SG1 2JY</p> <p>t: +44 (0)1438 316 331 m: +44 (0)7900 000 060 f: +44 (0)1438 722 035</p> <p>e: martin.friend@vincent-gorbing.co.uk</p>	<p>Thank you for consulting us on the above. We respond on behalf of Taylor Wimpey UK and Barratt Homes in relation to the LA3 allocation site, notated as CHA/1 in the SHLAA.</p> <p>Our clients support the presentation of the site within the SHLAA and believe that it is factually correct.</p> <p>The fact that the site is suitable, achievable and deliverable is demonstrated by the on-going engagement in the joint production of the LA3 Masterplan and related policies of the Site Allocation DPD. Our clients will be actively supporting the Council in the Site Allocations DPD Examination and henceforward. Indeed, further technical work is now being mobilised to ensure that the necessary planning application(s) are brought forward in good time to allow the delivery of new homes in accordance with the Council's housing trajectory or earlier if the need</p>		<p>No change. Comments noted.</p>

w: www.vincent-gorbing.co.uk	arises.		
<p>Richard Butler MRTPI Senior Planning Associate Planning Division Bidwells, 45 Grosvenor Road, St Albans, AL1 3AW t: 01727 223900</p> <p>m: 07770013323 dd: 01727 223906</p>	<p>These comments are in relation to BW/1 – Edgeworth House.</p> <p>I write with regards to the work you are currently undertaking with AECOM on the SHLAA 2015/2016, and the currently consultation for fact checking the contents of the documents.</p> <p>My client owns Edgeworth House, High Street, Northchurch and my comments are in relation to the references to this property within the SHLAA documents. There are instances where information does not appear to be accurate and also where there are inconsistencies with how other sites have been considered when compared to the comments relating to my clients land.</p> <p>Comments in Relation to BW/1 – Edgeworth House Site Area</p> <p>The site area for the whole site is 1.9Ha; however an adjusted site area of 0.9 Ha has been used. It is not clear how this amendment to the site area has been arrived at. We accept that some reduction shall be necessary, but this should be informed by correct information. Comments later in this letter shall highlight concerns in other areas, and these should be taken into account before the adjustments to the site area is made. The document should be amended to note that the developable area shall be confirmed at a later date.</p> <p>Greenfield / Urban</p> <p>The categories used in the assessment are flawed as they give a misleading output to the assessment. For example, it is possible for a site to be within an urban location, but be a Greenfield site. One response refers to a location, or description of character/ appearance; Urban; while the other relates to the physical condition of the site; Greenfield.</p> <p>In the case of BW/1 it has been decided in the assessment that the site is</p>		<p>This has now been accepted as a suitable site for an estimated 12 units. The wording has been amended to give more details on site constraints.</p>

	<p>a Greenfield; however, when considering the location; adjacent to the high street, services, sports centre, public transport, and surrounded to most aspects by high density development, the description does not follow that of a traditional Greenfield site. We accept that the site does not comprise Brownfield land, or Previously Developed Land as defined by the NFFP, as the site is garden land. However, the distinction needs to be made that the site is not Greenfield.</p> <p>The assessment should be amended to recognise the urban location of the site and sustainable features of the location.</p> <p>This aspect of the assessment in relation to BW/1 has a number of inaccuracies.</p> <p>'Sensitive Site' This is a non-specific, unquantified, subjective and misleading comment. There are no other examples within the assessment of such general comments being made with regards to other sites. It is strange that such comments are used with regards to this site. The reference 'sensitive site' should be removed from the text.</p> <p>References to Flood Zones are noted, and we appreciate that the information currently available shows a proportion of the site (approximately 50% with reference to the Strategic Flood Risk Assessment Stage II, June 2008) is within Flood Zone 3a, 3b and 2; This is a strategic level assessment.</p> <p>We are aware of ongoing work being conducted by the Environment Agency with regards to the accurate Flood Risk mapping of the area. Representatives of the Environment Agency were at the site during 2015 to survey the site and following the publication of these findings there is likely to be adjustments to the Flood Risk designations. Assessments of the suitability of the site for development should be made with regard to</p>		
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	<p>this up to date and more accurate information. We have enquired with the Environment Agency over the likely date of publication of the documents and this is expected to be April this year.</p> <p>The site falls within an area of Archaeological Significance; this is noted on the Local Plan and Core Strategy Policy Maps. We do not dispute this designation, however, we would like to highlight that this is not a designation that strictly precludes development, but is an issue that should be considered through the course of the planning process. Many sites within the Area of Archaeological Significance in Berkhamsted have been developed recently with appropriate regard being given to archaeological matters; therefore this matter should not form a reason to consider the site as unsuitable for development.</p> <p>The site contains a Grade II* Listed Building. Again, this is not a matter that would preclude development, but one that should be given due consideration in the planning process.</p> <p>In summary, the only matter that could be considered as a principle issue in determining whether the site is suitable for development is the matter of flood risk, and the conclusion made in the assessment is on the basis of strategic information that will be replaced with updated information in the very near future. Therefore the conclusion that the site is not suitable for development is inaccurate.</p> <p>Further to the observations made above, there are a number of inconsistencies in comparison to other sites; examples of these are noted below:</p> <p>Comments on SHLAA assessment table</p>		
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Site Ref	Address	Published Comment	Bidwells Comment
BW30	Land at BFI	No significant Constraints identified. Site is adjacent to Listed Building.	The Listed Building close to the site entrance has had no negative impact on the consideration of the site for development.
APS/5	Former Hewdon Hire Site	Site contains Flood Zone 3a and 3b. Accepted	The flood risk issue has not been considered to preclude development on this site.
ASP19	Frogmore Road	Site contains Flood Zone 2 and 3. Accepted	The flood risk issue has not been considered to preclude development on this site.
ASP39	London Road	Site contains Flood Zone 3a and 3b but accepted as suitable.	The flood risk issue has not been considered to preclude development on this site.
ASP58	Apsley Paper Trail.	Flood Zone 2 and 3. Noted as acceptable.	The site is immediately adjacent to a Listed Building at the adjacent site. This is not mentioned in the assessment and does not impact on the consideration of the site for development. Planning Permission has been granted on this site despite the initial flood risk concerns.
TW35	Tring Road	Site is within Conservation Area and Area of Archaeological Significance and also outside of settlement (in Rural Area). Accepted	The site comprises a small area of woodland / open space to the rear of a number of residential properties. The site is not developed, but surrounded by development; the site is noted as being 'Urban'. This is similar to BW/1; however a different conclusion is made. TW35 is within a rural settlement. Site BW/1 is within a much larger urban settlement and should be regarded as Urban.
TW42	Chapel Fields	Site is within Conservation Area, Area of Archaeological Significance and has listed buildings on site. Accepted	No reduction/adjustment is made to the site area of the site, indicating that the full site area has development potential. No distinction is made with regards to Urban or Greenfield. The site has some similarities with BW/1 with the listed building and the archaeological significance; however, these matters are not considered to be a constraint on the development potential / acceptability of the site.
BW/2	Denny's Lane	Site is in Green Belt and contains playing fields.	The site has been accepted even though playing fields would be lost, with no identified site for replacement.

With regards to the table above, there are a number of examples where inconsistencies are present. It appears the site at BW/1 has been considered as unsuitable for development where others of equal constraint are considered to be acceptable.

BW/1 is dismissed at the principle stage; however, there is compelling evidence to suggest this should not be the case. The archaeological constraint and the listed building are matters that should be addressed at

the detail planning stage and not at this early assessment. With regards to flooding matters, on one count, there are a number of sites that have similar strategic designations of Flood Zone 2 and 3, and these have not been discounted; there are also examples where sites within these designations have been developed, such as the Lidl development on Berkhamsted High Street adjacent to BW/1.

Furthermore, the Environment Agency has confirmed that "The Gade and Bulbourne modelling study is ongoing. We are expecting to receive outputs in April this year, providing no unexpected delays are experienced. Once this has been delivered then we will be updating our Flood Map for Planning and detailed model outputs will be available as part of Product 4 requests". Important information which can directly inform the consideration of the suitability of BW/1 and also other sites in the study, will shortly be available; the assessment should be re-run with the up to date evidence base.

In summary, we have concerns that site BW/1 is being unfairly assessed within the published SHLAA; this in terms of; development site area; greenfield designation; and impact of site constraints of Listed Building, Flood Risk and Archaeology that have not been equally applied to other sites. For this reason, the assessment with regards to BW/1 should be reconsidered. The suggested assessment response is enclosed and we would welcome your consideration of this:

BW/1 SHLAA Assessment

Site Ref	Name	Area	Adjusted Site Area	Greenfield Urban	Summary	Suitable	Available	Achievable	Accept Reject
BW/1	Edgeworth House	1.9	1.5 HA	Urban	Site contains Flood Zone 3a/b and 2, to be adjusted following Environment Agency Project 4. Area of Archaeological Significance and Listed Building on site.	Y	Y	Y	A

In conclusion I would highlight that previous SHLAA work pre 2008

	<p>identified the Edgeworth House site as suitable for development. The view has been taken to now resist development on this site. Changes to National Planning Policy and indeed to housing supply in the period since the earlier SHLAA iterations have only acted to create a greater housing need both nationally and locally; the need to consider such sites objectively is therefore required.</p> <p>I trust the above is clear however, should you have any queries, or would like further information with regards to the above please do not hesitate to contact me.</p>		
<p>Hannah Smith Associate hannah.smith@quod.com Main: 0113 245 1243 Mobile: 07803 247 284 Direct: 0113 306 2281 www.quod.com</p>	<p>We have received notification that Dacorum Borough Council ('the Council') is updating its Strategic Housing Land Availability Assessment (SHLAA) and that the final 2016 Assessment is to be published on the Council's website in March.</p> <p>In advance, the Council has requested that site promoters review the draft SHLAA documentation and clarify any factual inaccuracies. This letter is provided in response to this request and relates to Albion Land's interests at Bourne End Mills Industrial Site, Hemel Hempstead ('the Site') (SHLAA Site Reference: BOV 65).</p> <p>Quod provided details of the Site in response to the SHLAA Call for Sites Exercise on 13 May 2015 and I enclose a copy of these representations for your information. Within the representations we requested that the entirety of the Site be assessed within the SHLAA.</p> <p>The Site benefits from an extant outline permission for comprehensive employment led regeneration and is currently the subject of a hybrid planning application for a viable mix of employment and residential uses. Members of the Council's Development Control Committee agreed unanimously with officers' recommendation on 25 February 2016 and delegated approval of the hybrid application to officers subject to the signing of a Unilateral Undertaking. The decision reaffirms the Council's</p>		<p>Changed site boundary in mapping report and changed site area to 3.96ha.</p>

	<p>position that the entirety of the Site is appropriate and necessary for comprehensive regeneration.</p> <p>Albion Land note the Council's positive assessment of the Site within the draft SHLAA documentation and support the Council's 'acceptance' of the Site as a 'suitable', 'achievable' and 'available' location for up to 45 residential dwellings together with Class B1, B2, and B8 uses.</p> <p>It is noted however, that the SHLAA assesses the development potential of only part of the Site, assessing only that area encompassed by the Major Development Site (MDS) Core Strategy (2013) designation.</p> <p>Albion Land have stated in representations to the Council's emerging Site Allocations Development Plan Document (SADPD) (September 2015) that the MDS boundary does not reflect the areas of built form that currently exist across the Site nor does it recognise the area considered appropriate for redevelopment through the Site's planning history and as such has little relevance to the assessment of the Site's development potential. It has been shown in previous representations that the MDS area is arbitrary and ineffective in facilitating the physical upgrade of the Site.</p> <p>The Council have recognised this by proposing to amend the extent of the MDS so that it is synonymous with the attached site boundary within the Council's emerging SADPD.</p> <p>In summary, and to reaffirm the conclusions of our previous representations to the SHLAA and SADPD, we respectfully request the assessment boundary for Site Reference BOV 65 be amended to reflect the enclosed red line boundary. The assessment area should be amended accordingly within the Site Assessment Schedule to 3.96ha.</p> <p>I trust the above and enclosed is sufficient to allow you to update the assessment and we look forward to receiving confirmation of the update</p>		
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	when the SHLAA is published in March.		
<p>Paul Cronk MRTPI Principal Consultant JB Planning Associates</p> <p>Chells Manor, Chells Lane, STEVENAGE, Herts SG2 7AA</p>	<p>We are promoting two sites on behalf of clients:</p> <ol style="list-style-type: none"> BOV56 – H/21 Garden Scene Nursery, Chapel Croft, Chipperfield <p>We have no factual updates to report.</p> <ol style="list-style-type: none"> KL/1 – Land at Ridgeway Close, Hemel Hempstead <p>We note that reference is made to “Developer estimates 10-12 flats and available 0-5 years”.</p> <p>The text should be amended to “Developer estimates 10-12 flats, <u>or a small number of houses</u> and available 0-5 years”.</p> <p>The above change would reflect the actual content of our previous Call for Sites return, and the fact that our client is flexible in terms to the type of housing suitable for the site.</p>		<p>Changed wording to include ‘a small number of houses’</p>
<p>Joanne Crook Team Secretary 10th Floor 1 New York Street Manchester M1 4HD T 0161 233 7676 turley.co.uk</p>	<p>On behalf of our client, Harrow Estates Plc, we have reviewed the above document and would like to take this opportunity to provide the following comments:</p> <p>Introduction</p> <p>You will be aware that we have been liaising with the LPA for some time regarding land to the north of Station Road, Tring and submitted representations to:</p> <ul style="list-style-type: none"> • Site Allocations DPD (Pre-Submission Plan) in November 2014 • The Call for Sites in March 2015, and • The Focused Changes to the Pre-Submission Site Allocations document in September 2015 • The Draft Statement of Community Involvement (SCI) document in February 2016 		<p>Amended wording and changed boundary in mapping report.</p>

	<p>Our clients welcome the fact that the land has been identified in the SHLAA Up-Date as a potential site for future assessment associated with the emerging Single Local Plan (Land at Marshcroft Lane ref: TE17).</p> <p>Representations</p> <p>These representations correct the factual details set out in the SHLAA Up-Date:</p> <p>Site TE17</p> <ul style="list-style-type: none"> • Page 113 of the Site Schedules document sets out a brief summary of the site; it contains a number of factual inaccuracies that: <ul style="list-style-type: none"> • <i>The majority of the site is on Grade 2 Agricultural Land:</i> whereas a detailed agricultural appraisal carried out on behalf of Harrow demonstrates that 80% of the land is low quality, comprising a mix of Grades 3b and 4. This is summarised at page 27 of the site advocacy document submitted to accompany the Call for Sites. An Agricultural Land Classification plan is also included within this response letter at Appendix 1 for information. • The land is an area of Archaeological Significance: whereas this designation relates to only the western part of the site as described on page 29 of the submitted site advocacy document. The archaeological site of interest extends to only 1 acre and is identified for clarity in the Historic Environment Record plan at Appendix 2. • The red line boundary of site TE17 shown within the SHLAA (Figure 24) does not fully reflect that submitted with the representations on behalf of Harrow Estates Plc in that: <ul style="list-style-type: none"> • It excludes a small parcel of land adjacent to the existing urban area of the town on the western side of the site; and • Includes parcels of land on the northern edge (off Marshcroft Lane) and at the eastern point (off Station Road) that are not in the ownership of Harrow Estates Plc. • A red line plan showing the extent of Harrow Estate Plc's ownership is 		
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	<p>included at page 4 of the site advocacy document. A further copy can be found at Appendix 3 to this letter.</p> <p>Inconsistency in Constraints Analysis</p> <p>In addition to the above site-specific comments, an inconsistency has been noted between the constraints referenced in the 'Summary' section for this site and other sites considered in the SHLAA. For example, the commentary on site TE14 makes no reference to either agricultural land quality or archaeological constraints, the latter having been raised in our site advocacy document (section 7).</p> <p>Neither does the commentary on sites TE16 and TC34 reference their partial locations within Wildlife Corridors which appears to be noted in relation to TE17. While not entirely clear from the document, this reference appears to relate to the Key Diagram in the Core Strategy. We have also reviewed the Green Infrastructure Study (2011) which identifies an area of local protection for nature conservation running through site TE14, and shows sites TW1 – 3 and TW5 as lying within a Key Biodiversity Area. All sites to the north, south and west of Tring (Sites TW1 – 3, TW5, TC34, TW45 and TE14) are shown in that document as lying within an area of Class 3 landscape rarity; yet no reference is made of this in the SHLAA document.</p> <p>It is recommended that potential constraints are considered consistently for each site within the SHLAA to ensure that the report is not misleading.</p> <p>I trust that these comments will be taken into account and the factual amendments made, and future documents presented using a consistent basis for assessing sites. Should you have any queries regarding the comments provided, please do not hesitate to contact me.</p> <p>Sam Ryan Director</p>		
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	Sam.ryan@turley.co.uk		
Melvyn J Else and Ann Else Owners of site BW 1	<p>I must begin by saying how disappointed I am with the conclusions you have reached in relation to the site BW 1 in the above mentioned document. I would ask you to re-visit your analysis and findings in relation to this site before final publication taking into account the comments made below and the contents of the attached document.</p> <p>There would appear to be a distinct lack of consistency in terms of how this site is treated in the above mentioned document when compared with how other sites are treated with the same or similar constraints. Indeed I would say this problem extends beyond this document and we can include other sites in the immediate locality where planning permission has been granted (next door Turners Court, next door but one Lidl and just down the river the large Stag Lane development to name but three). These sites have the same flood risk as BW 1, the Stag Lane development also has a listed building on its edge. Surely for the analysis, and for the document to be credible there must be consistency throughout. Consistency within the document and consistency of planning decisions within the locality itself.</p> <p>As I understand the purpose of this document is to identify potential sites for housing development. It is not to grant planning permission but primarily to say if the site is one which within a time frame is likely to be available and is worthy of taking forward to a more detailed planning application/evaluation. As I understand the question at this stage is more “is it a site that could contribute towards meeting the housing needs of Dacorum in the future”?</p> <p>This site is one which is NOT in the Green Belt. Why preference is being given to building over 20% of Dacorum’s housing needs in the Green Belt between now and 2031 and at the same time rejecting sites like BW 1 forces one to ask does this policy meet Government Guideline?</p>		Changes noted above.

	<p>I thank you for the acknowledgement of receipt of my submission in relation to BW 1. At the time I could not find the enclosed document to support my argument about the inconsistency of the way site BW1 was being treated when compared for example with the Lidl site in relation to flood risk although I mentioned it in the submission.</p> <p>The attached document was submitted as part of the Lidl planning application (which was approved). It clearly shows the River Bulbourne with the store between 12 and 15 m from the river and eight metres from the car parking. Furthermore it shows the entrance to an underground car park at a similar distance to the store. It is also worthy of note that the flood risk at this point is greater than at any point as the river passes through BW 1. This is because the Lidl site is very close to one of the pinch points on the River Bulbourne as it passes through three small pipes to go under Billet Lane.</p> <p>I trust the attached is of assistance to you in your analysis.</p>		
<p>Maureen West (Mrs) BSc, Dip.TP. MRTPI (Ret)</p> <p>Fox Meadow, Louise Walk, 55 Green Lane, Bovington, Hemel Hempstead, HP3 JZ</p> <p>Tel: 01442 832803</p>	<p>Subsequent to our telephone conversation this morning, I am formally writing to advise you of erroneous information contained within the above report.</p> <p>I refer to the information held within the AECOM report which cites Site BOV/2 'Land south of Green Lane - Shown on Map 14' and details the following:</p> <p>"Access an issue but could be through adjacent BOV/1"</p> <p>As I explained to you in my telephone conversation, this description of site BOV/2 is incorrect.</p> <p>In fact, I own LOUISE WALK which represents an access point from GREEN</p>		<p>Removed reference to access.</p>

	<p>LANE directly to site BOV/2.</p> <p>LOUISE WALK is a tarmacked road with verges on either side. In it's current state, LOUISE WALK meets the standard required for two-way traffic, but could easily be widened if it were required. LOUISE WALK serves three residential dwellings and leads directly to site BOV/2, 5 acres of which is owned by me.</p> <p>Thus, there would not only be potential access to site BOV/2 via site BOV/1, but also directly off GREEN LANE via LOUISE WALK. Contrary to the AECOM report, access to BOV/2 is not an issue of concern, should the site be considered for development.</p> <p>Please amend the description given in the report to take account of this information.</p> <p>I would envisage development of BOV/1 and BOV/2 being planned together, the sites being contiguous and affording at least two viable access points.</p> <p>I would be very grateful if you could acknowledge receipt of this e mail and that the AECOM report has been amended.</p>		
<p>Jenna Stalker MRTPI, BSc (Hons), MSc</p> <p>JS Planning 9 Woodsend Close Lower Earley Reading Berkshire RG6 4AT</p> <p>07900 218023</p>	<p>I have reviewed the draft SHLAA 2015 on behalf of my clients Crest Nicholson and Linden Homes in respect of their landholding in Hemel Hempstead. I submitted details to the earlier call for sites consultation which took place in March 2015, and provided updated details with regards to their landholding at Red Line Lane, Nash Mills, Hemel Hempstead, together with supporting technical reports demonstrating the site's achievability. Having reviewed the latest consultation draft SHLAA, I can find no reference to the information submitted having being taken into consideration or included within the current consultation draft. The closest reference I can find to the site is under site ref: NM13 - former SAPPI site, Nash Mills - which represents the wider site which my clients</p>		<p>Comments have been noted and the changes made accordingly.</p>

	<p>control. The former SAPPI site on the northern side of Red Lion Lane is being re-developed for housing. The site submitted to the 2015 call for sites is the remainder of the landholding south of Red Lion Lane. This has been briefly assessed as part of the wider site (of site NM13) in the site schedules as "no known intentions to develop the Green Belt part of the site". This is clearly inaccurate given the information submitted in March 2015.</p> <p>I attach the information submitted in March 2015 again for your consideration and inclusion in the final SHLAA. I would be grateful if you would acknowledge the contents of this e-mail and provide me with reassurance that the details submitted in respect of my clients site will be fully considered. As you will see, we consider that the site provides a great opportunity for additional housing development and is deliverable in the short-medium term.</p>		
<p>Anthony Frendo BA (Hons) MSc MRTPI Senior Planner Planning</p> <p>Savills, 33 Margaret Street, London W1G 0JD</p> <p>Tel :+44 (0) 20 7299 3048 Mobile :+44 (0) 7807 999 986 Email:AFrendo@savills.com</p>	<p>On behalf of our client, GUI Ltd, please find attached our "fact checking" comments on the draft SHLAA.</p>		<p>Sites have been merged to reflect the comprehensive approach to the proposal.</p>
<p>Richard Butler MRTPI Senior Planning Associate Planning Division</p> <p>m: 07770013323 dd: 01727 223906</p>	<p>I write with regards to the work you are currently undertaking with AECOM on the SHLAA 2015/2016, and the currently consultation for fact checking the contents of the documents.</p> <p>My client owns site TW/6 – Station Road, Long Marston and my comments are in relation to the references to this property within the SHLAA documents.</p>		<p>The site has been accepted as a suitable site and the wording amended.</p>

	<p>The assessment notes a number of matters with regards to the suitability of the site; Concerns are noted with regards to access; the site is noted as available and as having potential as a rural exception site; and the notes conclude that the site is unsuitable as the access is unsafe.</p> <p>We have concerns with these comments for a number of reasons, and these are set out below.</p> <p>The site is available and has a very good relationship with the existing settlement of Long Marston; the development of the site would form an opportunity to provide an appropriate level of growth with limited impact to the open countryside setting due to the relationship of the site to the existing settlement, and the existing landscape screening provided by the north and west boundaries.</p> <p>The assessment references the site as having potential as a rural exception site. This may be true and could well form an appropriate approach for development in the future; however there are many other sites on the edge of rural settlements identified in the assessment and these are not regarded with the same comments. We feel this may be misleading for consideration of the site in the future, creating an unfair expectation that the site shall be first considered for rural exception (affordable housing led), when it may be appropriate as a housing allocation under the consideration of the Single Local Plan. The fact that this comment is not applied to other sites is the main concern, and we therefore ask for this reference to be removed from TW/6.</p> <p>The concerns regarding access are noted, however, we would like to clarify if this view has been taken with the input from a Highway Consultant or Herts County Council Highways. I suggest a solution is possible without significant adjustments to the highway, with appropriate access likely to be possible through visibility splay provision. The approach to the road side boundary is currently regulated to 30mph for a good distance prior to the site.</p> <p>The site should not be regarded as unsuitable without further investigation into the highway issues.</p> <p>There is concern that some inconsistency exists within the assessment.</p>		
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	<p>Site TW/6 has been regarded as unsuitable, but there are examples of sites where existing uses shall need to be relocated; such as LG42 (relocation of Tennis Courts) and BW/2 Denny's Lane (relocation of sports pitches); however these are still regarded as suitable and accepted within the SHLAA. The identification of alternative land for these uses is likely to be a more difficult matter to overcome than the solution of the highway issues identified for TW/6; we therefore suggest TW/6 should be regarded as suitable also.</p>		
<p>Struan Power BSc (Hons) MA MRTPI Senior Planner</p> <p>DLP (Planning) Limited 4 Abbey Court Fraser Road Priory Business Park Bedford MK 44 3WH</p> <p>m 07917 178389 t 01234 832 740</p>	<p>I understand, having spoken directly with officers at Dacorum Borough Council that the purpose of the above consultation is to consult landowners, developers and other interested parties as part of a fact-checking exercise, in respect of sites that have already been promoted to the Council.</p> <p>Whilst 'new' sites will not be considered as part of this fact-checking exercise, I am informed that additional sites may be put forward my landowners/developers on an ongoing basis, to be considered as future potential additions to the SHLAA.</p> <p>I have reviewed the documents the subject of this consultation and I would like to draw to your attention the factual inaccuracies in the Council's assessment of my Client's site, identified by the Council in the 'Summary Site Assessments: Volume 2' as CH15: St Albans Hill.</p> <p>Whilst we welcome the Council's assessment of CH15 in that no constraints to development are identified, the recorded site size is incorrect and is fact greater than 0.4ha. and I attach a plan indicating the extent of land that could be available, for approximately 60 dwellings, comprising land owned by Northridge Cars Ltd and Dacorum Borough Council. Furthermore, the Council's assessment concludes that there is no intention to develop the site. This is incorrect; my Client has engaged in informal discussions with the Council's planning and estates departments with a view to comprehensively redeveloping the site for residential purposes.</p> <p>Following positive discussions with the Council my Client has instructed professional services to submit a formal pre application proposal in the immediate future. The site is in a highly sustainable location close to the town centre and is walking distance from the key services and facilities on offer, with access to excellent transport links via road and rail. The site is</p>		<p>Site boundary has been changed. Site area 0.4ha and capacity of 27 units.</p>

	<p>suitable and appropriate for residential redevelopment and is both deliverable and developable, without complicated land ownership issues and without known constraints to development.</p> <p>To this end I would like to place on record, on behalf of Northridge Cars Ltd., the intention to redevelop the site for residential development. As such, I respectfully request the Summary Site Assessment document be amended accordingly in light of the above information.</p>		
Email response from Helena Deaville on AE44	Noted the site area was incorrect. FW also noted some repetition in the summary notes.		<p>Edited the wording to remove repetition. Changed site area to 19ha. The capacity remains at 550 units.</p>

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