



Providing Homes and Community Services



Site Allocations

Background Issues Paper November 2015

Background Issues Papers

Introduction

A series of background papers have been prepared to support the Pre-Submission Site Allocations Development Plan Document (DPD). These are as follows:

- **The Sustainable Development Strategy:**
 - (a) Green Belt, Rural Area and Settlement Boundaries
 - (b) Transport
- **Strengthening Economic Prosperity**
 - (a) Providing For Offices, Industry, Storage and Distribution
 - (b) Supporting Retailing and Commerce
- **Providing Homes and Community Services**
 - (a) Providing Homes
 - (b) Social Infrastructure
- **Looking After the Environment**

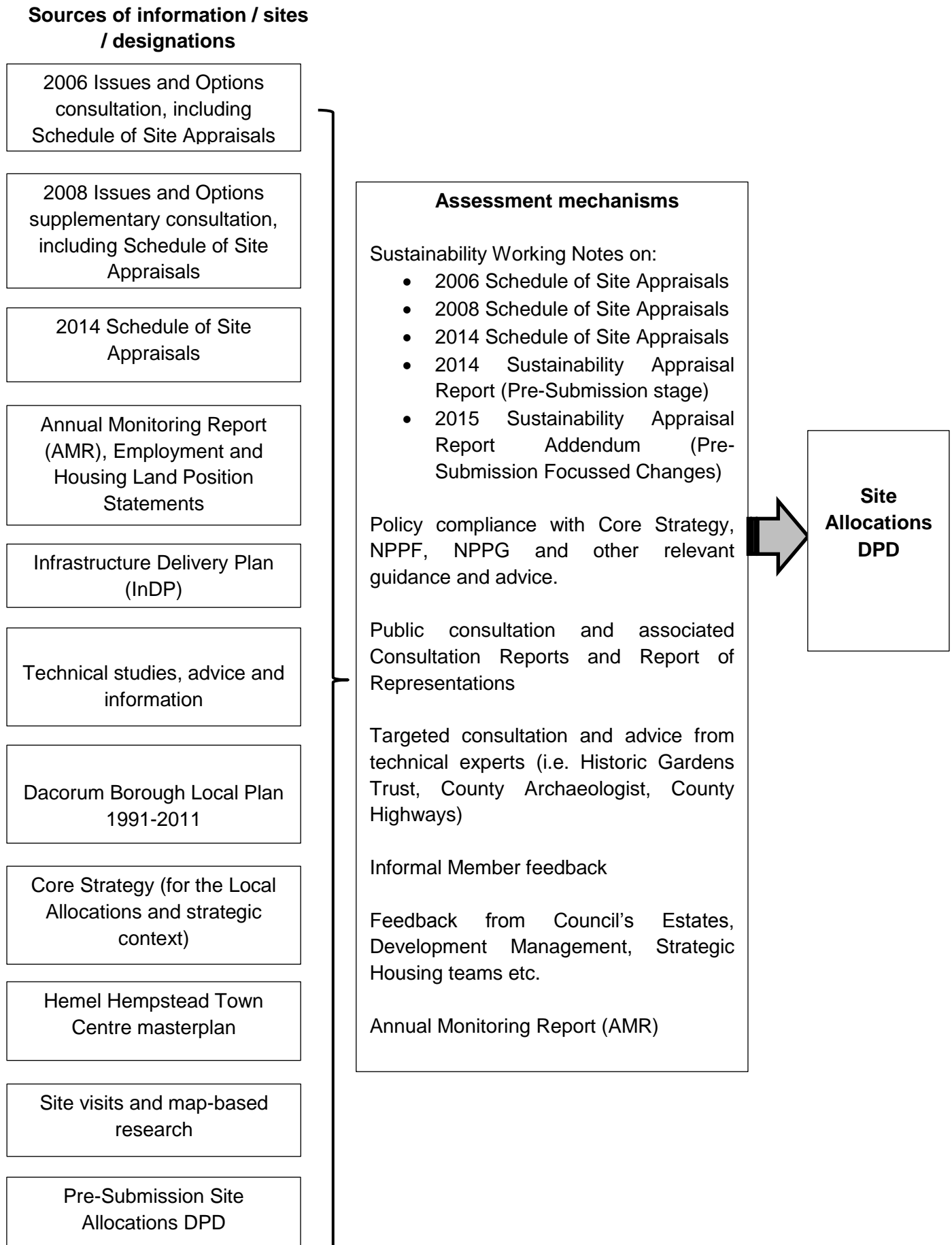
These papers form part of the evidence base. Their role is to inform the content of the Site Allocations DPD through:

- (a) Summarising background policy, guidance and advice relevant to each subject area; and
- (b) Assessing which sites, designations and/or boundary changes it is appropriate to take forward in the context of this advice and set out any additional selection criteria used.

Information has been collected from a number of different sources and as the assessment has been an interactive process, incorporating the conclusions of sustainability appraisal and advice from technical experts as appropriate (see Figure 1).

This document is version 3 and updates and supersedes the previous version published in June 2015.

Figure 1: Assessment of Alternative Sites, Options and Designations



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A. Providing Homes

1. Providing Homes

Introduction

- 1.1 The Council is able to allocate specific sites and defined locations to promote and bring forward land for a range and mix of housing. Where appropriate, such allocations are supported by detailed planning requirements, and, in the case of the local allocations, by master plans.

National Policy

- 1.2 National advice on housing is provided through the National Planning Policy Framework (NPPF), with further guidance (recently published in March 2014) through the National Planning Practice Guidance (NPPG).
- 1.3 Paragraph 159 of the NPPF advises that local planning authorities should identify the scale and mix of housing that meets household and population projections, taking account of migration and demographic change. This is against the background of boosting significantly the supply of housing and meeting the full objectively assessed needs for market and affordable housing in the market area (subject to compliance with other policies in the NPPF) (paragraph 47).
- 1.4 With regard to plan-making (and focussing on the role of the Site Allocations DPD), the NPPF requires local planning authorities (LPA) (paragraph 157) to:
 - Plan positively for the development and infrastructure required in the area;
 - Indicate land-use designations on a proposal map;
 - Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on the form, scale, access and quantum of development; and
 - Identify land where development would be inappropriate.
- 1.5 The NPPF also requires that LPAs have a good understanding of housing needs and demand in their area (paragraphs 158 and 159) through an up-to-date evidence base and through the preparation of key technical documents (i.e. the Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA)).
- 1.6 In allocating sites and defining broad locations for housing in the Site Allocations DPD, the Council will need to ensure such housing is:
 - deliverable and developable (paragraph 47 and footnotes 11 and 12); and
 - promotes sustainable, inclusive and mixed communities through planning for a mix of housing that reflects the different needs of different groups in the community (paragraph 50).

- 1.7 In respect of the travelling community, national policy is set out in the Planning Policy for Traveller Sites (August 2015 which updated the March 2012 advice) (PPTS). The Government has made clear that it does not see an unmet need as automatically signalling that land should be developed in the Green Belt (be it for housing or traveller pitches) states:

‘Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt’ (Paragraph 034 of the PPG).

Core Strategy and ‘Saved’ Policies

- 1.8 Dacorum’s Core Strategy was adopted on 26 September 2013 and sets a clear strategic policy framework against which to progress the Site Allocations DPD.

- 1.9 Policies that relate directly to housing, affordable housing, and the travelling communities include:

- CS3: Managing Selected Development Sites
- CS6: Selected Small Villages in the Green Belt
- CS7: Rural Area
- CS17: New Housing
- CS18: Mix of Housing
- CS19: Affordable Housing
- CS20: Rural Sites for Affordable Homes
- CS21: Existing Accommodation for Travelling Communities
- CS22: New Accommodation for Gypsies and Travellers

- 1.10 In addition, the Place Strategies set out an indicative level of new development for each settlement and the countryside. Others policies such CS1: Distribution of Development, CS2: Selection of Development Sites, CS4: The Towns and Large Villages, CS5: Green Belt and CS7: Rural Area has more indirect impacts, through the control of the location and scale of new development.

- 1.11 The Core Strategy policies are complemented by ‘saved’ policies from the Dacorum Borough Local Plan 1991-2011 (DBLP). These policies will be revised and superseded through the Site Allocations and Development Management DPDs and any associated guidance. Relevant policies include:

- 15 – Retention of Housing
- 18 – The Size of New Dwellings
- 19 – Conversions
- 23 – Replacement Dwellings in the Green Belt and the Rural Area
- 24 – Agricultural and Forestry Workers’ Dwellings
- 26 – Residential Caravans
- 27 – Gypsy Sites
- 28 – Residential Moorings

2. Housing

Site Selection

2.1 The Council has assessed a range of sources of sites as potential allocations for the Site Allocations DPD. These include:

- unimplemented Local Plan proposal sites;
- sites put forward through consultation on the Issues and Options stage (in 2006 and 2008);
- sites put forward through the “call for sites” in early 2014;
- existing SHLAA sites; and
- new housing sites identified in the housing programme in the Authority Monitoring Report (AMR).

These sources are discussed in more detail below.

2.2 Identifying suitable allocations has been made easier with the adoption of the Core Strategy which now provides a clear strategic framework against which to make decisions on future housing up to 2031 (subject to future work on the early partial review). In addition, the process of producing and adopting the Plan has also provided an early opportunity to sift sites as set out in the following documents:

- Housing Land Availability Paper - July 2009;
- Housing Land Availability Paper - July 2011;
- Background Paper – Selecting The Core Strategy Housing Target - June 2012

The papers are available via the following link:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/core-strategy/core-strategy-examination-2012/housing-documents>

2.3 The Council takes the view that not all available sites should be allocated. The allocation process should concentrate on future housing potential. The schedule therefore excludes all sites that are already at an advanced stage in the planning application process e.g. subject to planning permission, awaiting completion of s.106 agreements, awaiting a decision on a planning application, etc. This has ruled out taking forward a number of potential allocations, especially given the advanced stage some submitted sites have reached since the earlier Issues and Options stage in 2006 and 2008. Such sites are monitored in detail through the annual housing programme in the AMR and as part of the yearly Residential Land Position Statements and have been taken into account in the housing programme as at 1st April 2015 (see Housing Supply section below).

- 2.4 The schedule excludes all sites with a capacity of below 10 homes and/or below 0.3 ha in area. The Council consulted on this methodology at the 2006 Issues and Options stage and there was broad support for this. It was argued that this approach would avoid a proliferation of smaller housing sites where it was more difficult to establish detailed planning requirements and which cannot be easily identified on the Proposals Map. The Council considers that this is a reasonable and practical approach to take forward now.
- 2.5 The Council has undertaken a Call for Sites exercise in early 2015. We asked if landowners had a potential site(s) they would like to promote for any kind of use, including housing, traveller pitches, employment and retail development and leisure and community facilities, etc. A threshold was set of 5 or more homes or 0.25 ha for a housing site. New sites submitted under this process (and others) are being initially appraised through the update of the 2008 Strategic Housing Land Availability Assessment (SHLAA) (see paras. 2.27-2.30 below). This information alongside other technical documents will help inform decisions on the amount, location and type of future housing in preparing the new Single Local Plan.

Schedule of Site Appraisals

- 2.6 The Council has undertaken a constraints-based approach to appraising a wide range of potential allocations and designations, including housing:
- Dacorum's Schedule of Site Appraisals – November 2006;
 - Dacorum's Supplementary Schedule of Site Appraisals – November 2008; and
 - Dacorum's Supplementary Schedule of Site Appraisals – September 2014.
- 2.7 This has provided an opportunity to systematically appraise sites against a range of broad land use and sustainability considerations. These documents are available via the following link:
- <http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations>
- 2.8 This has helped support decisions on selecting allocations at each stage of the preparation of the Site Allocations DPD.
- 2.9 It has often proved difficult to make firm decisions on sites at the early Issues and Options Stage given the (then) limited progress of the Core Strategy in providing a strategic context for this. However, it was possible to make decisions to not carry forward a number of sites, particularly greenfield sites on the edge of settlements or in the wider countryside, on the basis of their effect on key environmental designations including:
- Chilterns Area of Outstanding Natural Beauty (AONB)
 - Special Area of Conservation (SAC)

- Site of Special Scientific Interest (SSSI)
- Local Nature Reserve (LNR)
- Semi-Natural Ancient Woodland
- Historic Park and Garden
- Scheduled Ancient Monument (SAM)
- Floodplain (only in relation to greenfield sites)

2.10 Greenfield sites for housing, in both urban and rural locations, were unpopular with the public at both Issues and Options stages.

2.11 Conversely, with the adoption of the Core Strategy the Council has now been in a better policy position to make firmer decisions on these sites as set out in the summary schedule in Technical Appendix 1.

Sustainability Appraisals

2.12 Sustainability appraisal is a decision aiding tool rather than a decision making one. The Working Notes to the Site Appraisal process sets out the results of the appraisal of the Site Allocation Issues and Options Paper 2006 and 2008 and the 2014 Schedule of Site Appraisals. These Working Notes are not a formal part of the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) reporting process. However, they have provided an independent appraisal of the issues discussed and helped guide decisions on allocations in conjunction with conclusions from the Site Appraisals and consultation process. They have helped ensure decisions on allocations contribute towards sustainable development principles.

All these appraisals are available via the following link:

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/site-allocations>

Green Belt Land and Review

2.13 Developers and landowners have continued to promote land on the edge of settlements and in the wider countryside for housing, particularly Green Belt land. Therefore, the allocation of new housing sites needs to be seen in the context of the role of the Green Belt. However, the use of such land for housing has proved unpopular with the public and other organisations (e.g. CPRE), as reflected in the responses to both Issues and Options stages of the Site Allocations DPD and work on the housing programme to the Core Strategy.

2.14 The Council acknowledges national priorities to boost overall housing supply and to deliver sustainable housing development. Equally, it is a national priority to maintain, as far as is possible, established Green Belts.

2.15 Strategic decisions on how to deal with the scale and location of housing sites on Green Belt land (and land in the Rural Area) for the current plan have been

taken through the Core Strategy. The Core Strategy has already considered where significant changes can take place to accommodate housing in the Green Belt through the identification of the local allocations (LA1-6). This approach has been endorsed by the Examination Inspector. Therefore, there is no role for any significant new Green Belt releases within the Site Allocations DPD.

2.16 The Core Strategy makes clear (paragraph 8.29) that:

“No further change will be necessary [to the Green Belt boundary] in the Site Allocations DPD, other than to...correct any minor anomalies that may still exist. While the development needs often relate to housing, some sites will include proposals for employment, social and community and/or leisure uses...”

2.17 The Site Allocations DPD is only proposing that minor changes to boundaries be taken forward. Therefore, it allows for minor revisions to the Green Belt whilst maintaining its general extent.

2.18 The approach to Green Belt anomalies (and other related boundary changes) is explained in more detail in the associated background issue paper. Very few changes are recommended and no strategic revisions are supported. The latter will be considered comprehensively through the future Green Belt review under the early partial review of the Core Strategy (as part of preparing a new single local plan).

2.19 The commissioning of a comprehensive Green Belt assessment for Dacorum was a specific requirement of the Core Strategy Examination Inspector and one that is reflected in the Core Strategy (Section 20). The first stage of the work was undertaken by consultants Sinclair Knight Merz (SKM) and published in November 2013 (Stage 1 ‘Purposes Assessment’ for Dacorum). The methodology used by SKM reflects that used for other similar assessments elsewhere in the country.

2.20 This technical work on the Green Belt has been referred to by landowners in support of some releases for housing (for example on the edge of Berkhamsted and Bovingdon) as part of submissions to the recent “call for sites” early in 2014. Such an approach is premature.

2.21 Sites are allocated to achieve the requirements of the Core Strategy. However the Core Strategy was only found sound on the basis of an early partial review which will in fact be a Local Plan dealing with both strategy and allocations. Thus if full objectively assessed need indicates an increase in the housing requirement then Site Allocations will need to increase too unless full objectively assessed need cannot be achieved for other policy constraint reasons as indicated in the NPPF at paragraph 47.

2.22 The Green Belt impact is but one part of wider evidence gathering that will be used to inform future decisions on the scale and location of new development. The fact that the study has identified a small number of locations where the Green Belt does not fully meet the five NPPF criteria (paragraph 80) does not

justify the release of land for housing in these locations through the Site Allocations process. It is technical work only and does not represent policy. The parcels are very strategic in nature following good practice for such studies and the study makes no recommendations for specific development opportunities.

2.23 Any significant role for the Green Belt should be properly considered in the light of on-going technical work and through the Single Local Plan (incorporating the partial review of the Core Strategy) which needs to re-visit:

- household projections;
- the role and function of the Green Belt affecting Dacorum, including long term boundaries and the potential to identify safeguarded land beyond 2031; and more significantly;
- the role that effective co-operation with local planning authorities could play in meeting any housing needs arising from Dacorum. This element will include St Albans district and relevant areas lying beyond the Green Belt.

2.24 The Council has appointed consultants ARUP and agreed the methodology for the Stage 2 Green Belt work. The work will consider further those parts of the Green Belt identified in the Stage 1 study as 'contributing least' to the Green Belt purposes, together with any other sites that we may wish to suggest for assessment. The consultants will advise how best to involve landowners / developers and take account of independent technical work that has been prepared for sites. The study will be published later in 2016.

Dacorum Borough Local Plan

2.25 The Dacorum Borough Local Plan (DBLP) has been an important starting point for identifying allocations. While the majority of housing proposals in the Local Plan are now implemented, it still contains possible allocations including those that are part implemented and unimplemented. These include:

1. Sites in the schedule of housing proposals;
2. Conversion of employment land to housing (Policy 33); and
3. Land subject to more detailed supplementary planning guidance.

2.26 Part implemented and / or unimplemented sites considered with recommendations include:

1. Housing Proposal Sites:

Plan ref.	Address	Net Capacity	Progress	Recommendation
H9	Bury Garage, Bury Road, Hemel Hempstead	9	Below threshold. No recent activity.	Do not allocate.
H17	St George's Church, School Row, Hemel Hempstead	23	No intent to progress.	Do not allocate.
TWA1	Breakspear Hospital / land	92	Bulk of land built	Allocate.

	to r/o 162 – 238 Belswains Lane, Hemel Hempstead		out. Potential for continuing development to rear of housing of remaining small parcel of land.	
TWA5	Gas Board site and land to rear of London Road, Hemel Hempstead	150	Site part built out. See also H/h34a and H/h34b in the Schedule of Site Appraisals and SHLAA site APS9. Potential to incorporate additional land. Landowner intent to progress.	Allocate.
H25	55 King Street, Tring		Long inactive site.	Do not allocate.
H31	Harts Motor, 123 High Street, Markyate	9	Landowner intent to progress. See also M/h10 and SHLAA site WA19.	Allocate.
H37	Land at Durrants Lane / Shootersway, Bekhamsted	100	Taken forward as Strategic Site SS1 (180 homes). Planning permission on southern part of revised site.	Allocate.
H40	Turners Hill, Hemel Hempstead	40	Potential to be brought forward pending decisions on Hospital site. See also SHLAA site AW25.	Allocate.
H42	Land at Westwick Farm, Pancake Lane, Hemel Hempstead	40	Outline permission approved on part of site for 26 dwellings (4/0216/13). Landowner interest on remaining land.	Allocate.

2. Conversion of employment land to housing under Policy 33:

Plan ref.	Address	Net Capacity	Progress	Recommendation
-	Gossoms End (East)/ Stag Lane (East)		Part of site built out. Planning	Do not allocate.

			permission approved for sheltered home on remaining land (4/0994/13).	
-	Ebberns Road, Hemel Hempstead	-	Much of site is built out. Continuing developer interest in bringing forward remaining land.	Allocate.
-	Western Road	-	Part of site is built out. Continuing developer interest in bringing forward development on remaining land.	Allocate.
-	London Road, Markyate	-	No developer interest in bringing forward land. Retain for employment.	Do not allocate.

3. Land subject to more detailed supplementary planning guidance:

Plan ref.	Address	Net Capacity	Progress	Recommendation
-	Development brief for Deaconsfield Road (Dowling Court/Johnson Court), Hemel Hempstead	-	Both Dowling Court and Deaconsfield Road have effectively been built out. SHLAA sites CH16a and CH30.	Do not allocate.
-	Development brief for Deaconsfield Road (Sempill Road), Hempstead	-	No development interest shown. SHLAA site CH18.	Do not allocate.

2.27 A number of these sites have important employment implications and are also dealt with in the associated Strengthening Economic Prosperity background issue paper.

Strategic Housing Land Availability Assessment

2.28 The Strategic Housing Land Availability Assessment (SHLAA) was published in October 2008 and sets out a list of greenfield and previously developed land (PDL) with housing potential. It replaced the earlier Urban Capacity Study. Both sources have been subject to appraisal and consultation through the Issues and Options stages. The PDL sites have generally been supported at the

consultation stages. A review of the SHLAA was completed in July 2010 in order to further consult with the development industry on how sites could be taken forward and the work updated¹.

2.29 The Council has been systematically refining the SHLAA as part of its work on its annual housing programme through the Authority Monitoring Report (AMR) and Residential Land Position Statements. This has involved monitoring the progress of sites, updating site information, establishing and contacting landowners and taking policy decisions over the suitability and availability of sites. The process has also been documented in the Housing Land Availability Papers referred to the Site Selection section above. Consequently, since 2008 the potential pool of sites available as allocations has reduced. Many are now complete (See Technical Appendix 2), while others are not suitable to be carried forward as they are below the site size threshold and/or no clear intent has been established that the site is realistically available for development (Technical Appendix 3).

2.30 The Council has initially used the latest information contained within the housing programme set out in the 2012/13 AMR for assessing the contribution from SHLAA sites using a base date of 1st April 2013. This was subsequently updated from 1st April 2014 at the consultation stage of the Pre-Submissions Site Allocations DPD and further updated to 1st April 2015 at the “Focused Changes” consultation stage. Technical Appendix 3 sets out a summary of which sites have and have not been taken forward and Technical Appendix 7 in the housing programme provides a more detailed commentary on individual sites.

2.31 The Council has commissioned AECOM to carry out a full update of the 2008 SHLAA covering the period 2015 - 2036. The updated SHLAA is due to be published in March 2016. The results of the SHLAA will feed into technical work on future housing land supply and potential site allocations in the emerging single Local Plan. The equivalent Economic Land Availability Assessment (ELAA) will be undertaken separately as part of on-going work on employment land for the new plan. This will include an appraisal of the quality and quantity of employment land.

Local Allocations and Master Plans

2.32 The Core Strategy identifies six greenfield sites in the Borough where land is to be released from the Green Belt for housing:

Table 1: List of Local Allocation sites

Site Ref.	Address	Capacity as assumed in the Core Strategy (net)
Hemel Hempstead		
LA1	Marchmont Farm	300

¹ Stage 2 Review of the SW SHLAA (April 2010)

LA2	Old Town	80
LA3	West Hemel Hempstead	900
Berkhamsted:		
LA4	Land at and to the rear of Hanburys, Shootersway	60
Tring:		
LA5	Icknield Way, west of Tring	150
Bovingdon:		
LA6	Chesham Road/Molyneaux Avenue	60

2.33 Each local allocation is set out in more detail in the respective Place Strategy. The larger sites will also provide opportunities for other uses including Gypsy and Traveller sites, leisure space, commercial floorspace, and small-scale community facilities. The former is explored in additional detail in the section below. Their principle has been thoroughly justified and tested against competing sites, and endorsed through the Core Strategy Examination process. They are now firmly established housing proposals in the Core Strategy. There are no significant impediments to their delivery and they should be taken forward as allocations.

2.34 The role of the Site Allocations DPD is to provide detail on their delivery, form and timing.

2.35 Each local allocation is supported by a master plan. However, the key requirements will be set out in the Site Allocations document and this will ensure that they have maximum statutory weight. The role of the master plans is to elaborate on how these requirements will be delivered. They are deliberately set at a strategic level, and thus do not offer full details i.e. precise location and design of individual homes. The majority of sites are not generally intended for immediate delivery and some issues may therefore change, or details will not be known until considered through the planning application process.

2.36 The master plans reflect the outcome of continuing positive joint working in order to ensure deliver of the local allocations. Officers have worked closely with the landowners / developers / agents on the master plans. This has benefits in terms of establishing common ground and an understanding of key site issues, and has been recognised as 'good practice' by the Planning Advisory Service (PAS). The role of the master plans has been to:

- Help establish the detailed principles for inclusion in the housing schedule within the Site Allocations document.
- Provide further guidance against which to assess future planning applications.
- Allows key issues to be considered in more detail than would be the case if the Council just relied on the planning requirements in the Site Allocations DPD.

- Provide an opportunity for members of the public, infrastructure providers etc. to give early feedback on the likely shape of the development, rather than waiting for a planning application to be submitted.

2.37 The exact content of the master plans does vary between sites to reflect local character and context, but certain key issues are covered in all cases including:

- Consideration of site constraints and opportunities (text and map).
- Clear set of development principles that will guide the shape of new development.
- Indicative layout (in 'block' form) to show broad configuration of uses, access points etc.
- Establishment of detailed parameters such as number and location of access points, numbers of homes and infrastructure to be delivered via s106, etc.
- General guidance on issues such as sustainable drainage, affordable housing, design and sustainable design and construction.

2.38 One key benefit of progressing the master plans has been that, in most cases, the work has either confirmed anticipated capacities for the local allocations or identified that they can deliver more housing than originally envisaged in the Core Strategy, although LA4 is likely to deliver less:

Table 2: Comparison of Local Allocation capacities between the Core Strategy and Master Plans

Site Ref.	Address	Core Strategy Capacity (net)	Emerging Master Plan Capacity (net)
Hemel Hempstead			
LA1	Marchmont Farm	300	300-350
LA2	Old Town	80	80
LA3	West Hemel Hempstead	900	900
Berkhamsted:			
LA4	Land at and to the rear of Hanburys, Shootersway	60	40
Tring:			
LA5	Icknield Way, west of Tring	150	180-200
Bovingdon:			
LA6	Chesham Road/Molyneaux Avenue	60	60

2.39 Following consultation at the Pre-Submission stage of the Site Allocations, the Council is not proposing any fundamental changes that affect the principle and individual capacity of the Local Allocations.

Core Strategy Strategic Sites

2.40 The Core Strategy identifies two Strategic Sites in, respectively, the Berkhamsted and Markyate Place Strategies:

- SS1 – Land at Durrants Lane / Shootersway, Berkhamsted; and
- SS2 – Land at Hicks Road, Markyate

- 2.41 SS1 is effectively carrying forward an earlier DBLP proposal, but in a revised form. Development in this area has proved locally unpopular through the Supplementary Issues and Options stage and subsequently, but the principle is now confirmed through the Core Strategy. The southern half of the SS1 proposal was the subject of an outstanding planning application for 92 homes (4/0262/14) in 2013/14, but this was subsequently refused in July 2014. The Planning Inspectorate has refused a Town and Village Green Application on the northern section of the proposal, and there are current discussions as to how to take this portion of the site forward. Given continuing development interest, the proposal as a whole should be carried forward as an allocation.
- 2.42 Following the Pre-Submission consultation period, the refused application was allowed at appeal in March 2015. Furthermore, a revised application was submitted (4/3241/14) and was subsequently approved in the same month. Work has now started on the 92 homes in the 2015/16 period.
- 2.43 The bulk of SS2 is at an advanced stage with planning permission granted for 75 homes and other community and commercial uses, and is now substantially complete. Only a small parcel of the remaining land fronting Watling Street, and that formed part of the original master plan site area², is not developed. This can also be carried forward (under proposal H/23) as the landowner has shown interest in seeing the land developed.

Employment Land

- 2.44 The NPPF advises local authorities to:

“..avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used.” (paragraph 22)

- 2.45 The DBLP had already taken decisions on what land can be released from employment use for housing (Policy 33) and remaining opportunities in the towns and large villages have been carried forward as allocations (see section on the DBLP above and sites covered by Policy 33). The Core Strategy has allowed for a review of the quality of existing and amount of future employment land required to 2031³. This is explained in more detail in the Strengthening Economic Prosperity background issue paper.

² Hicks Road Masterplan (Updated) June 2012

³ South West Hertfordshire Employment Land Update (June 2010) and Dacorum Employment Land Update 2011 (July 2011)

2.46 The review of employment land has been further refined through a review of the General Employment Areas boundaries under the Site Allocations DPD. Opportunities for housing emerging from this process include:

Table 3: Opportunities for housing in current General Employment Areas

GEA	Net Capacity	Comment
Frogmore Road	100-150	Large site available. Access on to Durrants Hill Road needs careful consideration. Potential for high density housing. Flood risk assessment required. Site has important canal frontage. Retain Frogmore Mill under GEA.
Two Waters	160	Carry forward and expansion of existing DBLP housing proposal. Potential to include adjoining additional land. Any contamination needs to be dealt with.
Paradise	75	Potential for housing as a result of the re-designation of the GEA to form part of the town centre.
Billet Lane	30	Housing reflects opportunity for a mixed use foodstore and residential development under an approved scheme (4/1317/14).
Miswell Lane	24	Loss of existing DBLP employment proposal being replaced through development of LA5. Miswell Lane is principally residential in character.
Akeman Street	10	Small loss of GEA. Removal of existing depot use provides an opportunity to improve the character and appearance of the Conservation Area and the local amenity.
Hicks Road	10	Most of the existing GEA will be lost as part of its redevelopment for housing currently being implemented. This land parcel will be isolated from remaining commercial uses, but could link to current new housing development.

2.47 The position on General Employment Areas has been complicated by a number of landowners taking advantage of the flexibility under the prior approval process to convert from offices to housing in these (and other) locations. This will provide a useful supply of future housing, although there will be little direct control and predictability over this. Certainly, they have had the effect of boosting commitments from changes of use and conversions as reflected in the recently published Residential Land Commitments Position Statements.

2.48 There are a number of future housing sites within and around the Maylands Business Park that will be identified separately from the Site Allocations DPD through the East Hemel Hempstead Area Action Plan. These include:

Table 4: Key Housing Sites in the East Hemel Hempstead Area Action Plan (AAP) Area

Location	Capacity	Progress
Spencers Park (Phase 2), Three Cherry Trees Lane (SHLAA ref. AE44)	c.550*	Land principally in one main ownership. Master plan/development brief required. Comprehensive development to be delivered and coordinated with earlier phase. Medium term, with delivery expected from 2019/20 onwards.
Heart of Maylands, Wood Lane End / Maylands Avenue	c.400	Creation of a new local centre with supporting uses. Precise boundaries of this to be defined in the AAP. Land in multiple ownership. Feasibility study completed in 2010. Expected to come forward in phases from 2016/17 onwards. Detailed planning has been progressed in 2014/15 for eastern block to deliver a mix of housing, local retailing, commercial and social and community facilities (4/0676/14 and 4/0689/14).

Note: * The capacity excludes any land in St Albans and City District.

2.49 Their contribution to the housing supply is taken into account in the housing programme below in this issue paper.

2.50 The Council is responding to development pressures that are currently affecting the Two Waters area of Hemel Hempstead. In particular, this is having an impact on the character and mix of uses within the designated General Employment Areas in this location. It has appointed FERIA Urbanism to lead on the planning framework for the area. Following a series of workshops in May and June 2015 with a range of local stakeholders, the consultants have prepared a draft Two Waters Planning Framework that sets out a vision for the area as a basis for future planning guidance. The Council's aim is for this to be incorporated within the new Single Local Plan. The draft was consulted on over the summer period:

<http://www.dacorum.gov.uk/home/council-democracy/meetings-minutes-and-agendas/events/2015/07/21/cabinet/cabinet>

The planning framework will help identify areas of change and how this will be managed, particularly in respect of the shift from commercial to residential. It will also set out opportunities for potentially higher density forms of housing in the area which could increase its overall contribution to future housing supply.

Town and Local Centre

2.51 The town and local centres have traditionally provided a valuable source of housing allocations and other contributions to housing supply within the Local Plans. They represent an opportunity to achieve high-density housing in

sustainable locations, possibly as part of a mix of other commercial / community uses. Their contribution towards the housing supply may increase further with the greater flexibility allowed over office conversions to housing and changes of use of retail units under recent permitted development rights changes.

- 2.52 There are a number of large-scale redevelopment opportunities in Hemel Hempstead town centre that have been identified through the earlier Issues and Options stages and equivalent SHLAA sites. These and other opportunities have been supported in policy through the Core Strategy (Hemel Hempstead Place Strategy and Policy CS33) and Hemel Hempstead Town Centre Master Plan (HHTCMP).
- 2.53 Redevelopment opportunities have been explored for a number of years on the north western section of the Marlowes (covered by SHLAA site HHC74) to allow for new civic facilities (Public Service Quarter (PSQ) (now referred to as The Forum)) and a replacement college. This is identified as the Gade Zone character area in the HHTCMP. Both elements are being actively pursued and also allow for opportunities for high density housing. In the monitoring period 2014/15 demolition of vacant buildings has already commenced on parts of the college campus. The level of housing could be further boosted if there is no longer market interest in developing part of the site for a new foodstore (in March 2014 Morrisson's withdrew their foodstore and petrol filling station proposal (4/01228/13/MFA)).
- 2.54 Development of The Forum and associated housing and other potential uses is to be taken forward through the Gade Zone Planning Statement. The Council has appointed a developer partner (Endurance Estates) for the development of the public sector land in the town centre. Outline planning permission (4/3624/14/MOA) has been granted on the land surrounding The Forum for 207 homes (part of proposal MU/1). The Forum scheme is currently under construction. However, 39-41 Marlowes (proposal H/6) is now no longer available as a housing allocation (it will be used for health-related purposes).
- 2.55 Some potential Hemel Hempstead town centre opportunities north and south of the Market Square / Bus Station (as identified in technical work to the HHTCMP) have not been taken forward as allocations. There is concern that without an overall delivery mechanism these sites would prove difficult and expensive to bring forward for housing because of multiple occupancy / ownership issues.
- 2.56 The hospital site (see para. 2.65 below) and Paradise General Employment Area now fall within the wider town centre area. Changes to the approach on both sites are supported by the Core Strategy and HHTCMP and offer the potential for additional housing in this general location.
- 2.57 Berkhamsted town centre offers more limited scope for housing sites. The Council is considering development opportunities of its Civic Centre and the land to the rear (part of SHLAA site BE7), and this provides the possibility for a mix of town centre uses including housing (proposal H/16). However, there is

concern over the deliverability of the retail-led proposal and associated housing on land fronting and to the rear of High Street / Water Lane (DBLP Proposal S1 / SHLAA site BC41), especially given other emerging retail development in the town. See the retailing section in the Strengthening Economic Prosperity Issue Paper for further detail.

- 2.58 No allocations have been identified for Tring town centre. There are limited large sites available as allocations and some already benefit from planning permission.
- 2.59 Local Centres have not significantly contributed to allocations in terms of number and scale of individual sites. However, initial work on the Grovehill Neighbourhood Plan in Hemel Hempstead has identified the potential of up to 200 homes within the Grovehill (Henry Wells Square) Local Centre as part of potential future redevelopment for a mix of uses and rationalisation of land within the centre. However, this is not at a sufficiently detailed stage to justify a specific allocation but could contribute as part of a future defined location for housing. This could incorporate assumptions on SHLAA housing sites GH52 (Stevenage Rise) and GH55 (Turnpike Green) (a total of 38 homes). Currently, the Council has undertaken an Issues and Options consultation on the neighbourhood plan during the autumn of 2014. This work will help in the preparation of a draft plan. Thereafter, the Council anticipates going out to a referendum on the plan in early 2016.

Social and Community Facilities

- 2.60 There have been a small number of opportunities to secure housing allocations from land used for social and community purposes. However, the general approach has been to retain land in this use unless it is no longer needed or an alternative facility has been secured. Therefore, a cautious approach has been taken in considering housing allocations from this source with a number of SHLAA and Schedule of Site Appraisal sites rejected in order to retain the community use (see Technical Appendix 5).
- 2.61 Specific responses were sought on questions in the 2006 Issues and Options paper relating to potential uses of the hospital site and the four primary schools in Hemel Hempstead that were then subject to a County Council school closure programme (Hemel Hempstead Primary School Review). Responses were generally mixed, but there was no overwhelming objection to some form of reuse of these sites for housing.
- 2.62 The County Council has reconsidered its decision on these school sites in the light of ongoing school planning and service needs (see the Primary School section within the Providing Community Services below). The following school sites in the 2006 Schedule of Site Appraisals are to be retained in educational/community use:
- Pixies Hill (H/h56)
 - Barncroft ((H/h57)

- Jupiter Drive (H/h58)

2.63 The potential for housing has also been explored on other County Council managed sites through the 2008 Schedule of Site Appraisals process and SHLAA, but are also not seen as being currently available:

- Family Centre, Leighton Buzzard Road (HHC21);
- Greenhills Day Centre, Tenzing Road (H/h78 and AE41);
- Boxmoor House School, Box Lane (H/h92)

2.64 The County Council do not consider that the former Martindale School site is now appropriate to be returned to educational use, and an outline application on the site for 43 homes (4/0925/14) was approved in February 2015.

2.65 Once decisions have been made by the health/hospital authority, the redevelopment of the hospital site offers scope for a large proportion of new housing (c. 200 homes) as part of a mix of other uses including a new hospital, open land and a site for a new primary school to serve the town centre. Currently, options to improve health and social care in west Hertfordshire were published in autumn 2015. These options will be subject to further consultation with a view to identifying preferred options for services by early 2016. Once this strategy has been devised by Herts Valley CCG, West Herts Hospital NHS Trust will be able to clarify their position in relation to the delivery of services and in particular the future of healthcare (and other uses including housing) on the Hemel Hempstead hospital site. Such options are unlikely to be presented until June 2016 at the earliest.

Open Land

2.66 Open Land continues to be safeguarded from new development, including housing. Indeed, there is scope to support additional Open Land designations in Hemel Hempstead and Berkhamsted through the Site Allocations DPD (see the Open Land section within the Providing Community Services below). Such designations were very well supported by the public during consultation on the 2008 Supplementary Issues and Options Paper.

2.67 The current interest in developing the former Convent site on Green End Road, Hemel Hempstead for housing and the issues it raises is dealt with below (see para. 2.71).

2.68 However, there may be opportunities in exceptional circumstances and where fully justified, to support development of Open Land where there are wider planning benefits. The Council is supporting in principle housing on part of open land currently occupied by the Leverstock Green Lawn Tennis Club, Grasmere Close as enabling development (allocation MU/5). The original proposal was initially rejected under the 2006 Issues and Options Paper (H/h80), principally because of the lack of identified alternative venue. A new location is now being explored on Bunkers Lane / Bedmond Road as part of a mix of other leisure and community uses (H/c5 and H/L8 in the 2014 Schedule of Site Appraisals). This

is explained in more detail in the Providing Community Services section of this paper.

- 2.69 Following comments from Sports England during the Pre-Submission stage, the Council is seeking to amend the planning requirements to ensure the delivery of both the housing proposal and the related replacement club on the Bunkers Lane site are coordinated. This is likely to require the future submission of a simultaneous application for both proposals.

Pre-Submission consultation

- 2.70 A number of additional sites were put forward by agents/landowners during the Pre-Submission consultation period. None of these representations resulted in the Council recommending any new allocations. The bulk of such sites were in the Green Belt:

- Land to the east of New Road, Berkhamsted
- Land at Denny's Lane, Berkhamsted.
- Blegberry Gardens, Berkhamsted.
- Land at Rose Cottage, 17 Bank Mill Lane, Berkhamsted
- Land between Marshcroft Land and Station Road, Tring.
- Land at Waterside, Tring.
- Chilterns Jaguar Garage, Bovingdon.
- Land to the rear of Green Lane/Homefield, Bovingdon.
- Land at Love Lane, Kings Langley.
- Button House, Pix Farm Lane, Bourne End.

- 2.71 Many of these were sites that had previously been appraised through the Site Allocations process and rejected on a number of grounds, including the adequacy of the housing supply and Green Belt issues (as set out in paras. 2.13-2.24 above). This reasoning remains applicable to the newer sites being promoted (i.e. New Road and Denny's Lane sites in Berkhamsted). The Chilterns Jaguar and Button House sites are both previously developed land and could in principle be brought forward for development in the Green Belt in accordance with national and local policies (i.e. para. 90 of the NPPF and Core Strategy Policy CS5) without the need for an allocation. Land at Love Lane would also run contrary to the Council's approach to new allocations in the Green Belt and, in any event, it would have been below the threshold (of 10 or more dwellings) for an allocation.

- 2.72 Land adjoining Dixons Wharf, Wilstone was also put forward as a new housing site in the Rural Area. This had already been previously rejected as an allocation given its more isolated location away from the village and impact of development on the surrounding countryside. St Mary's Convent, Green End Road, Boxmoor was not supported as an allocation given its impact on the Open Land setting it is located within (although some form of development within the Convent's existing built footprint would be acceptable in principle). There is active interest in pursuing a scheme through the development management process.

Phasing

- 2.73 Only the local allocations will be subject to any form of phasing in the Site Allocations DPD. All remaining sites are un-phased (i.e. they can come forward at any time). Many of the allocations are modest urban sites and can come on-stream when necessary without placing pressure on local infrastructure. The larger urban sites (e.g. Spencers Park (Phase 2), Three Cherry Trees Lane) will naturally be subject to some form of phasing in terms of physical delivery, infrastructure needs and market mechanisms, and we anticipate these being brought forward over a number of years.
- 2.74 The Council only intends to control the delivery of local allocations up to 2021 and not introduce any specific phasing for the 2021 – 2031 period. In reality, applications will need to be received and determined before then to allow this to be achieved. Indeed in Policy CS3 there is flexibility over their delivery to allow the release date of the local allocation to be brought forward if necessary to maintain a five year housing land supply.
- 2.75 Core Strategy Policy CS3: Managing Selected Development Sites controls the timing of delivery, stating that the Local Allocations will be delivered from 2021. This approach is principally to ensure a steady release of housing land over the plan period, to encourage earlier opportunities for homes on previously developed land within the settlements, to boost supply over the latter half of the housing programme (where identified urban sites decline), and to maintain housing activity for the development industry and wider local economy. In the short to medium term, housing supply in the Borough is strong, without their contribution.
- 2.76 The release dates for all Local Allocations have been considered as part of background work to inform the Site Allocations document. This involved taking account of the criteria in Policy CS3: Managing Selected Development Sites:
- (a) The availability of infrastructure in the settlement;
 - (b) The relative need for the development at that settlement; and
 - (c) The benefits it would bring to that settlement.
- 2.77 Following further consideration of local housing needs and the role the site will play in delivering other essential local infrastructure, the delivery of Local Allocation LA5: Icknield Way, west of Tring has been brought forward into Part 1 of the Schedule of Housing Proposals and Sites.
- 2.78 Whilst no specific delivery date has been set, this will follow the formal release of the site from the Green Belt i.e. after adoption of the Site Allocations DPD.

The reasons for this early release are as follows:

- (a) the role the site will play in ensuring a robust 5 year housing land supply (for both bricks and mortar homes and Gypsy and Traveller pitches);

- (b) the fact that the most pressing need for Gypsy and Traveller pitches is for the Romany Gypsies, who are located in the Tring area;
- (c) the limited supply of other large development sites to help meet immediate housing needs in the Tring area;
- (d) the benefits of the early delivery of the extension to the Icknield Way GEA;
- (e) the benefits of securing land for an extension to Tring cemetery and associated public open space; and
- (f) the lack of any infrastructure capacity issues that require site delivery to be delayed until later in the plan period.

2.79 The remaining Local Allocations (i.e. LA1-LA4 inc. and LA6) are included in Part 2 of the Schedule of Housing Proposals and Sites and will bring forward completed homes from 2021 onwards. Whilst all provide some of the benefits outlined above with regard to LA5, none are considered to provide equivalent justification for early release.

2.80 No detailed phasing of the remaining Local Allocations is warranted as they vary significantly in size, character, and location, and these factors will naturally regulate their release over time. However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that applications will be received and determined in advance of 2021 and that site construction and works may actually take place ahead of the specified release date to enable occupation of new homes by 2021.

Housing Supply

2.81 Based on the conclusions from assessing the above sources of housing it is possible to identify suitable allocations that can be delivered, are sustainably located, and can contribute to the supply of future housing. Sites are thus allocated to achieve the requirements of the Core Strategy (i.e. at 430 dwellings per annum). Taking into account completions to date (3,377 homes), these allocations will assist in meeting the remaining housing target to 2031 alongside the contribution from other sources.

2.82 The starting point for assessing the housing supply has been the housing programme (as at 1st April 2013) as set out in the Council's 2012/13 Annual Monitoring Report. This has now been updated to a base date of 1st April 2015 to reflect key changes to sites and to adjust those sites that are to be identified as allocations (as some allocations have been previously identified within the housing programme). Commitments have also been updated to 1st April 2015 to accord with the latest position in the Residential Land Position Statement No. 42.

2.83 Monitoring information in this section has thus been updated as at 1st April 2015.

2.84 It is clear that when all allocations and other contributions are taken into account the housing target can be met and modestly exceeded (see Table 5).

Table 5: Housing Programme 2006 – 2031

Source	No. of homes (net)*
Completions 2006 - 2015	3,377 [†]
Commitments as at 1st April 2015	2,569 [†]
Housing schedule (comprising new allocations, Mixed Use Allocations and Local Allocations)	3,246
SHLAA sites	644
Other (non SHLAA) sites	423
Defined locations in Hemel Hempstead	315
Windfall in Residential Areas of the main settlements	500
Gypsy and Traveller pitches	17
Total	11,091 [†]

* Source: 2014/15 AMR (as at 1st April 2015).

2.85 The housing trajectory sets out projected completions over the plan period (Technical Appendix 5).

2.86 A detailed breakdown of the sources in Table 5 and their projected contributions can be found in Technical Appendices 6 and 7.

2.87 As well as satisfying the Core Strategy housing target, the housing programme achieves a 5-year supply of housing:

Table 6: 5-year housing land supply calculations (1st April 2016 to 31st March 2021)

25 year Core Strategy requirement 1 April 2006 – 31 March 2031	10,750
Completions 1 April 2006 – 31 March 2015	3,377
Projected completions (current year) 2015/16	629
Total projected completions 2006-2016 (3,377+ 629)	4006
Remaining Core Strategy requirement 2016 – 2031 (10,750 – 4,006)	6,744
Requirement for 2006 - 2016 (430 x10)	4,300
Shortfall 2006 – 2016 (4,300 – 4,006)	294
5 year requirement for 2016 – 2021	2,552
Core Strategy unadjusted housing target (430 x 5) = 2,150	
<u>Plus</u> Shortfall = 294	
<u>Plus</u> 5% buffer brought forward from later in plan period (5% of 2,150) = 108	
Annual adjusted 5 year requirement (2,552 / 5)	510
Projected supply 2016/17 - 2020/21	2,995
No. of years supply (2,995 / 510)	5.9 years

Source: DBC monitoring /Residential Land Position Statement No. 42 - 1st April 2015

Need for Contingency and Windfalls

2.88 The Council is confident that, especially in a currently rising housing market, the allocations set out in Table 5 will be delivered over the lifetime of the plan. In conjunction with other identified, defined location and windfall sites, it will be in a good position to achieve the housing target to 2031.

2.89 While the projected excess over the housing target in Table 5 is reasonable (i.e. 341 units) the following points should be noted:

- A five year supply of housing can be achieved (Table 6);
- The five year supply does not rely on any small windfalls and the housing programme excludes any large windfall assumptions;
- No account can be directly taken of small windfalls on garden land within the housing programme, but their contribution will be significant to future completions (i.e. around 40 units a year);
- Some capacity assumptions on sites are cautious, and more may be able to be achieved (e.g. a number of SHLAA sites take the mid-point of a range of development scenarios);
- More sites have been identified through the update of the housing programme to 2014/15;
- Office conversion to housing under the prior approval process is making a growing contribution to housing supply.

2.90 These factors provide for a modest buffer to adapt to rapid change and the unexpected non-delivery of sites. Bringing forward the local allocations, if required, provides additional flexibility during the short to medium term of the housing programme. Such an overall approach will ensure a robust supply of sustainably located sites and support a plan-led approach to housing land supply. In reality, events will be overtaken in early course via the Single Local Plan.

Responses Received to the Pre-Submission Site Allocations

2. 91 The Pre-Submission Site Allocations DPD was published in September 2014. A full summary of issues raised, and the Council's response, is set out in the associated Report of Representations (July 2015). A summary of key issues is set out below.

2.92 Representations were made objecting to the principle of removing the Local Allocation sites from the Green Belt, including the principle of locating gypsy and traveller sites within Local Allocation (LA) sites, citing National Policy regarding the Green Belt. Further objections were made on the basis that non-Green Belt sites should be exhausted before any sites are released from the Green Belt for use for housing.

2.93 The Council is satisfied that its approach to removing the LA sites from the Green Belt is robust and accords with national Green Belt policy in terms of the

plan-making process. The decision to remove the LA sites from the Green Belt was taken in the adopted Core Strategy. The role of the Site Allocations DPD is to take forward the levels of development at the broad locations set out in the Core Strategy. In taking the decision to remove these sites from the Green Belt, the Council gave full and proper consideration to the ability of non-Green Belt sites to meet housing need

- 2.94 A number of landowners used their response to changes to the Green Belt boundary in the Pre-Submission Site Allocations DPD to promote sites for development, either to be allocated for development immediately, or to be allocated for development following the partial review of the Core Strategy. No changes were made as the sites promoted were not suitable to be allocated for immediate development for various reasons; some had been previously considered and rejected, whilst others represented a change too big to be considered an anomaly to the Green Belt boundary. It is not appropriate for the Site Allocations DPD to allocate sites for development beyond the plan period as its role is to deliver the policies and objectives of the Core Strategy, not to pre-empt the content of any future Local Plan.
- 2.95 Thames Water submitted standard objections to Mixed Use allocations MU/1 - 4 (inclusive) and MU/6 (and to other proposals explained below) regarding the assessment of and potential need for drainage infrastructure. Changes are considered appropriate to accommodate these.
- 2.96 Natural England sought changes to the planning requirements to MU/4 to reflect the potential impact of the scheme on the nearby Roughdown Common SSSI. This is considered to be a constraint that the development should reasonably respond to and has been accepted as a proposed modification.
- 2.97 Sports England is supportive of the proposed leisure provision in allocations MU/5 and MU/6. However, some linked changes are required to MU/5 in order to take account of their related comments on the timing and delivery of the associated replacement tennis facilities under housing allocation H/7.
- 2.98 Berkhamsted Town Council objected to MU/6 in terms of the scheme's capacity being too high and in respect of the proposed removal of the existing General Employment Area (GEA) designation affecting MU/7. The existing housing capacity to MU/6 is considered appropriate in the circumstances. No change is justified in order to retain the existing Billet Lane designation given the advanced nature of the associated scheme and the impending relocation of the current occupiers. However, the Council has accepted suggestions from the Town Council that proposals H/15 and H/16 should be identified as new Mixed Use allocations (respectively MU/8 and MU/9) because of the more mixed character of these schemes.
- 2.99 Berkhamsted Town Council also raised detailed concerns over the form of the proposal in respect of allocations H/15, H/16 and H/17. Many of these concerns are already appropriately dealt with through the planning requirements, although their suggestion that the site boundary should be extended in respect of H/15 to reflect work on a detailed scheme is a reasonable one.

- 2.100 Representations were made supporting the case for both greater and lower levels of development, including across the borough as a whole and within individual towns. National policy was used to argue their respective cases. Two new sites in Bourne End and Berkhamsted were being promoted as a result of such objections.
- 2.101 The Council is satisfied that its approach to levels of housing development is robust and accords with Green Belt policy in terms of the plan-making process. The housing target has been set by the adopted Core Strategy. This has also established the principles for identifying the six Local Allocations. The role of the Site Allocations DPD is to take forward levels of development signalled by the Core Strategy. No “showstoppers” have been identified in terms of the adequacy of physical and social infrastructure to support future development in the Borough.
- 2.102 A number of housing sites were being promoted by landowners, agents and developers, particularly in relation to what was perceived as a lack of identified housing supply. Sufficient housing supply exists across the borough and within the towns in order to meet the Core Strategy housing target and indicative capacities identified in the Place Strategies. No new sites are therefore justified.
- 2.103 Luton BC emphasised the ability and reasonableness under the Duty to Cooperate for Dacorum to meet the unmet needs of Luton. This was considered in detail through the Core Strategy. The examination Inspector, in finding the Core Strategy sound, supported the Council’s approach to DTC and endorsed the Council’s target of 430 dwellings per annum subject to its early review. The review is being taken forward through the new single Local Plan which includes continuing engagement with districts on cross-boundary matters. The Council will also consider its ability to meet adjoining districts’ unmet need (and vice-versa) in updating its SHMA as part of the supporting technical work to the new plan.
- 2.104 The County Council has supported the provision of a new school under proposal LA3. Similarly, Sports England is supportive over the level of leisure provision to be provided by this allocation. The organisation also commented on proposal H/7. They were concerned over the link between the housing on the site and securing the replacement tennis facilities to an appropriate quality and quantity under MU/5. The Council acknowledge that changes to the planning requirements of both proposals would be helpful in achieving these aims.
- 2.105 Thames Water raised concerns in respect of a number of proposals and the potential adequacy of the drainage infrastructure to accommodate each new development. The Council accepts that a reference to the need to assess and potentially bring forward new infrastructure is appropriate. The Council has also accepted, where appropriate, comments from the Environment Agency that a number of proposals should make reference to Flood Risk Assessments.

- 2.106 Historic England objected to a number of proposals in respect of the form of development and its impact on local heritage. Some minor matters can be accommodated through changes to the planning requirements. Many other detailed concerns are already appropriately addressed through the planning requirements, and the Council is keen not to be too prescriptive with the nature of the scheme so as not to inhibit innovation in design.
- 2.107 A minor change (MC47) is proposed to delete proposal H/6 39-41 Marlowes, Hemel Hempstead from the housing proposal schedule. This was felt appropriate given that the building is now to be used for health service related purposes and thus would effectively be no longer available to contribute towards future housing supply. The change (and other minor changes) has resulted in a re-numbering of proposals in the schedule. In addition, the boundary to H/8 land at Turners Hill, Hemel Hempstead has been amended (MC58) to exclude land to the east which was drawn incorrectly (the land now forms part of MU/2 Hemel Hempstead Hospital site).

Local Allocation LA1

- 2.108 Only a few representations were received in response to this proposed Local Allocation with the majority raising objection to either the principle of the development or the proposed details, particularly in respect of the impact of the proposal on Piccotts End Conservation Area, capacity of the local highway network and flooding.
- 2.109 However, Natural England and Thames Water stated their support for this proposed Local Allocation. Natural England welcomed the retention of green infrastructure and positive effects of the proposal identified in the Sustainability Appraisal.
- 2.110 Thames Water support the proposal at LA1 but, as with a number of other proposed site allocations, have identified the need for developers to complete Drainage Strategy in order to assess and identify the requirement for new or upgraded infrastructure to ensure sufficient capacity is brought forward ahead of the development. The Council has incorporated this requirement into the draft master plan for LA1 and has also prepared an advice note for developers setting out the requirements of a Drainage Strategy for both Local Allocations LA1-LA6 and other site allocations as identified by Thames Water. This can be accessed via the Council's website.
- 2.111 Objections were raised to the principle of the development by the Council for the Protection of Rural England (CPRE) and by some local residents. This issue was common to all the other Local Allocations. Reference was also made to recent Government statements about Green Belt protection. However, the principle of the proposal is now firmly established through the adopted Core Strategy.
- 2.112 Historic England objected to this Local Allocation in respect of the proposed form of development and its impact on designated heritage assets.

Specifically, they raised concerns about the height of buildings within the site taking into account the local topography and the impact this would have on the Piccotts End Conservation Area. In response to this, the Council has proposed a modification to the 'Key Development Principles' section of Policy LA1 to clarify that buildings should be limited to two storeys in height except where a higher element would create interest and focal points provided such elements would be appropriate in terms of topography and visual impact (including impacts on the Conservation Area). Equivalent changes will also be made to the draft master plan. Furthermore, detail of the proposal including design of buildings will be set out and considered within any planning application.

- 2.113 With regard to flooding, some local residents have identified the prevalence of flooding at Piccotts End, which coincides with the flood zones around the River Gade, and are therefore concerned that the proposed development, taking into account the local topography, might exacerbate flood risk. The Council have recognised flood risk and drainage within the draft master plan and consequently identified the need to consider this in development of the master plan and preparation of any subsequent planning application. The planning application will also need to be supported by a site-specific Flood Risk Assessment and include appropriate Sustainable Urban Drainage Systems (SuDS) to mitigate any surface water run-off. Minor changes are proposed to reflect recent updates to national policy regarding the approval of SuDS.

Local Allocation LA2

- 2.114 Historic England expressed concern that the LA2 development would harm the historic character of the adjoining Old Town Conservation Area. They are not convinced that there should be any buildings over two storeys. However, they recognise that the key development principles for LA2 and the LA2 Draft Master Plan go some way to addressing their concerns. In response, the Council is proposing to amend key development principle 5 to state that new housing should not be harmful to the historic environment. Minor changes will also be made to the master plan.
- 2.115 Two other minor changes to Policy LA2 are proposed, to accommodate standard drainage concerns raised by Thames Water and national updates regarding the approach to the sustainable urban drainage systems (SuDS) approval system.

Local Allocation LA3

- 2.116 Objections were raised by local residents and the local action group (WHAG) to the principle of the development, the appropriateness of the infrastructure to support the proposal, and its justification under national Green Belt policy and against (what is felt to be) increasing levels of windfalls.
- 2.117 Access and the suitability of the local road network to accommodate the development proved to be common matters of concern. The associated

transport work and wider ongoing town modelling point to the ability of the local road network to support the allocation subject to on-site and off-site road improvements being in place. The proposed primary access points from Long Chaulden and The Avenue are logical and there are no other reasonable alternatives. The emergency access from Chaulden Lane, which could also serve the proposed traveller site, is needed and is suitable for this purpose. The Highway Authority supports the approach on all these matters.

- 2.118 Historic England raised a number of objections to the details of the proposals. Most of these were already addressed through the existing development principles in the policy and master plan. However, greater reference to the implication of the development on the site's heritage and archaeology was considered a reasonable change to accommodate.
- 2.119 Sports England stated their support for the new leisure space to be provided by the scheme.
- 2.120 The County's Ecology Advisor and the Dacorum Environmental Forum expressed concerns over the suitability of the proposed route and role of the green corridors through the allocation. Following discussions with the former, the County Council has acknowledged that there are advantages and disadvantages over the route of the corridor. On balance, they are satisfied that an east-west corridor is acceptable subject to adopting a sound approach to its ecological value and management. The Council accepts that clarification over the different leisure and wildlife roles and ongoing management of the green infrastructure would be helpful to ensure the ecology to be provided is of genuine value. These points can be reflected in amendments to the master plan.
- 2.121 Comments were received from a number of landowners regarding the clarity and flexibility of approach to the delivery of the development. The Council is satisfied that the policy and master plan remain clear over these matters and that flexibility already exists in policy to bring forward the scheme earlier, if required. It was pointed out that the boundary to the allocation had been incorrectly drawn to include part of the hamlet of Pouchen End. It is appropriate for the boundary to be redrawn to remove the hamlet.

Local Allocation LA4

- 2.122 Only a few objections were made to this local allocation. An objection was raised to the phasing of the proposal. However, flexibility already exists in policy to bring forward the scheme earlier, if required.
- 2.123 Historic England were concerned over the impact of the scheme on the British Film Institute site adjoining LA4, but this can already be dealt with through retaining and supplementing boundary planting and through care in the design and layout of new buildings.

- 2.124 Only two minor changes to the policy are proposed to accommodate standard drainage concerns raised by Thames Water and national updates regarding the approach to the SuDS approval system.
- 2.125 The County Council's Ecology Advisor remains concerned over the proposed mitigation for the loss of the area of grassland. The Council acknowledges that this remains an issue. However, it considers that appropriate mitigation can be achieved without the need for any modifications to the policy through ongoing discussions with the County Council once the practical implementation of the process becomes clearer.

Local Allocation LA5

- 2.126 Concerns were expressed by the Chilterns Conservation Board, Natural England, Aylesbury Vale District Council and others about the impact on the Chilterns Area of Outstanding Natural Beauty (AONB), contrary to national and local planning policies. In particular, there was concern regarding the proposed cemetery extension, the children's play area, Traveller site and possible playing pitches. In contrast, Sport England supports playing pitches on the site. A commonly held view is that the cemetery extension should adjoin the existing cemetery and not be physically separate from it.
- 2.127 The Council considers that LA5 will not significantly harm the special qualities of the AONB. Indeed, the AONB will be enhanced by the public open space and cemetery, which will be green, open, well landscaped uses. The Traveller site will be small, well screened and will have only a limited impact on the AONB (for further consideration of objections to the Traveller site, see d) above). The reasons why the Council favours a detached cemetery extension in the western fields within the AONB are set out in the LA5 Draft Master Plan, the main reason being that it will meet the long term needs for burials in the Tring area.
- 2.128 Many local residents consider that Tring's local infrastructure cannot cope with existing demand and LA5 will make the situation worse. Issues raised include overcrowded schools and doctors' surgeries, and traffic congestion in the town centre. Hertfordshire County Council has advised that there is scope to expand schools in Tring to meet anticipated future demand, whilst the Clinical Commissioning Group does not anticipate any capacity problems in the foreseeable future. Some changes to the 'meeting community needs' section of the Site Allocations document are proposed to clarify the position regarding schools. The Highway Authority has no concerns regarding the ability of the overall road network to cope with the scale of new development proposed, although some local measures will be required.
- 2.129 Other points from objectors include opposition to allowing development at LA5 before 2021 and the increase in estimated housing capacity from 150 homes in the Core Strategy to 180-200 in the Site Allocations document. No changes are proposed in response to these objections. Releasing LA5 before 2021 is justified for a number of reasons, including securing the wider benefits of the employment area and cemetery extensions and public open space at an early

date. The increased capacity at LA5 is justified on the basis of the more detailed technical work carried out to produce the draft master plan.

Local Allocation LA6

- 2.130 The majority of response related to details contained within the draft Master Plan, there were very few representations received in response to this Local Allocation.
- 2.131 Standard objections were raised to the principle of the development. A local landowner suggested that an alternative site within Bovingdon would be more suitability. The Council has assessed a number of sites in eventually identifying the site as a local allocation through the Core Strategy process.
- 2.132 Natural England and Thames Water stated their support for this proposal. Natural England welcomed the inclusion of pedestrian and cycle access to surrounding areas and supported the need to include biodiversity mitigation and enhancement measures within the planning application. These elements are already incorporated into the draft master plan and will both be material considerations at the planning application stage. Thames Water also highlighted the need for developers to complete a Drainage Strategy (as with the other five Local Allocations) and the Council has reflected this requirement through a minor change to the Site Allocations document.
- 2.133 As a result of representations received, the Council proposed a number of 'Focused Changes' to its Pre-Submission Site Allocations DPD. These changes were published for formal representations in August 2015. A list of the changes proposed – and whether they were considered to be 'significant' or 'minor' changes is set out in Table 4 of the Report of Representations (July 2015).

Responses Received to the Focused Changes

- 2.134 The Focused Changes consultation ran from 12 August to 23 September 2015. The total number of respondents (and individual comments) received to the Focused Changes consultation was low compared with previous iterations of the plan. Many of the comments received were either a reiteration of previous objections at the Pre-Submission stage (summarised above) or very general in nature and did not relate to any of the specific changes under consideration.
- 2.135 Few "Significant Changes" (SC) were proposed that directly affected housing sites. Some changes were required to the planning requirements of LA5 (SC 7, 8, 11) as a result of proposed changes to the Green Belt to accommodate the cemetery and to ensure consistency in the approach towards Gypsy and Traveller sites at LA1, LA3 and LA5. These received a number of objections from local residents and the traveller issue is discussed below in the Travelling Communities section.

2.136 The housing sites were subject to a larger number of more “Minor Changes” (MC). Comments were received on MC24 and MC25. MC24 updated the text relating to ensuring appropriate drainage provision as made for Local Allocation LA2. MC25 added a development principle to Local Allocation LA3 requiring the scheme’s design, layout and landscaping to safeguard the archaeology and heritage assets within and adjoining the development. This received a small volume of objections, but the new wording was however supported by Historic England.

2.137 The changes now recommended to the text as a result of representations received are limited and include:

Focused Change to be amended	Summary of suggested change	Reason
MC18, MC25, MC28 and MC34	Amend wording of text in ‘Delivery and Phasing’ sections of LA1, LA3, LA4 and LA5 regarding the need for a comprehensive approach to development.	To improve wording and make Council’s requirement for a comprehensive approach to development as clear as possible and tally with revised wording in master plans.
MC21	Amend wording for the development principle for LA2 regarding building heights.	To improve clarity of wording and ensure development principle tallies with revised wording in master plans.
MC24	Amend one of the development principles for LA3 relating to archaeological and historic heritage.	To improve wording and add reference to ecological assets which is currently missing.

Responses Received to the Local Allocation Master Plans:

2.138 Consultation on draft master plans for the six Local Allocations took place in parallel with the formal representations process for the Pre-Submission Site Allocations DPD (i.e. during September – November 2014). Feedback on the master plans is summarised in a separate Report of Consultation, which was agreed by Cabinet October 2015.

2.139 Due to their intended status as Supplementary Planning Guidance (SPG), the master plans are not subject to formal independent Examination. However, they will form important contextual information and it is important that the Inspector is made aware of the concerns raised by residents and other interested parties in the consultation responses to these draft documents.

2.140 The comments received regarding the Site Allocations document and those for the master plans are closely related, and therefore were considered in tandem by the Council. In particular, issues raised in response to the master

plans were applicable to the Local Allocation policies within the Site Allocations document and vice versa. Changes subsequently made to the Local Allocation policies (Policies LA1 – LA6) have been incorporated into the changes now proposed to the draft master plans.

2.141 The master plans were subject to a wide range of comments, the majority of which were objecting to the principle and details of each development (echoing concerns raised to Policies LA1 – 6) including:

- the principle of removing the Local Allocation sites from the Green Belt;
- the principle of locating gypsy and traveller sites within LA1, LA3 and LA5, citing national policy regarding the Green Belt.
- non-Green Belt sites should be exhausted before any sites are released from the Green Belt for use for housing;
- the suitability of local infrastructure including roads, schools and health services, etc.

2.142 Thames Water raised concerns in respect of a number of proposals in the Site Allocations DPD and the potential adequacy of the drainage infrastructure to accommodate each new development. This also affects the Local Allocations. The Council accepts that a change to refer to the need to assess and potentially bring forward new infrastructure is appropriate. Thus the master plans need to be similarly updated to reflect this approach. Thames Water have advised the Council there are no 'showstoppers' regarding waste water that would prevent the Local Allocations coming forward as planned, provided early liaison between themselves and the developers takes place and any necessary upgrades to the local sewerage network are implemented. Thames Water are supportive of (and fully involved in) the wider technical work being carried out for Hertfordshire on waste and potable water issues. This work will inform the new single Local Plan.

2.143 The Environment Agency highlighted a range of drainage, flooding, sewerage and water efficiency issues in the draft master plans. They emphasised the need to minimise run-off rates and to safeguard against ground water contamination. The Council has recognised flood risk and drainage within the draft master plans and consequently identified the need to consider this in preparation of any subsequent planning application. The planning application will also need to be supported by a site-specific Flood Risk Assessment and include appropriate Sustainable Urban Drainage Systems (SuDS) to mitigate any surface water run-off. They have made a number of useful detailed technical points regarding drainage matters that can be included as updates to the master plans. Minor changes are also proposed to the draft Master Plan to reflect recent updates to national policy regarding the approval of SuDS.

2.144 Historic England objected to a number of proposals in respect of the form of development and its impact on local heritage. Some minor matters can be accommodated, where necessary, through changes to the development principles in the master plans. Other detailed concerns are already appropriately addressed in the master plans, and the Council is keen not to be

too prescriptive with the nature of schemes, so as not to inhibit innovation in design.

- 2.145 Sports England made a number of general and detailed comments regarding sports provision. In particular, they raised concerns over the lack of contribution of the LAs towards both on-site (where relevant) and off-site indoor and outdoor facilities. The site specific issues, and the proposed responses, are summarised under the individual Local Allocations below. More generally, changes were made to some of the master plans to reflect that development may be required to make a contribution towards social and community facilities (which includes indoor and outdoor sports provision) if a need is identified.
- 2.146 Some changes to the master plans are justified to reflect the work of the Hertfordshire Local Nature Partnership (LNP), in partnership with the Herts and Middlesex Wildlife Trust, Hertfordshire County Council and the Herts Environmental Record Centre. They have produced a report on Hertfordshire's Ecological Networks following a county-wide mapping project. The intention is for the mapped ecological networks to be used by local planning authorities to inform forward planning and development management decisions. This assessment of ecological networks identifies strategic priorities and which habitats need to be maintained, restored and created based on a relative scale. This information should be used to inform detailed design each site and what measures can be incorporated to meet ecological objectives, areas of predicted high priority for restoring ecological networks.
- 2.147 Consideration of representations to the Focused Changes has not raised any significant new issues which have implications for the master plans. A few minor changes are however appropriate to ensure 'read across' from the Site Allocations document. These changes include:
- Checking that the master plans include the most up to date indicative layout from the Site Allocations document, as amended by the Focused Changes (if relevant);
 - Ensuring the amended text proposed in the delivery sections of Policies LA1-6 regarding ensuring a comprehensive approach to development is reflected in the master plans; and
 - Ensuring any wording changes to development principles which are common to both the Site Allocations policy and master plan are made.
- 2.148 As a consequence, the following changes were recommended as a result of amendments agreed by Cabinet in October 2015 to the Local Allocations master plans:

Policy	Summary of suggested change	Reasons
LA1	Revised site layout to show existing pedestrian route between Link Road and Margaret Lloyd Park, and to amend reference to landscaped buffer on the western edge of the site.	To ensure Site Allocations DPD and associated site master plan tally.

LA2	Update indicate layout with version from updated master plan to ensure it is clear there is to be no vehicular access from site into existing residential area to the north.	To ensure Site Allocations DPD and associated site master plan tally.
LA3	Correct location of a footpath link and correct site boundary of allocation in south west corner.	To ensure Site Allocations DPD and associated site master plan tally and the site boundary reflects that shown on the Policies Map.
LA5	Replace existing indicative layout map with amended version below which deletes the words 'and other facilities' from the label for 'Cemetery car park' and to update development principle 11 to reflect this.	To ensure Site Allocations DPD and associated site master plan tally.

3. Rural Affordable Housing

- 3.1 For each selected small village within the borough, the Council has defined a village envelope. Its purpose is to prevent the spread of development into the countryside, to maintain the essential character of each settlement, and to control the growth within and outside each settlement in accordance with the settlement hierarchy in the Core Strategy (Policy CS1).
- 3.2 Historically, the smaller villages have offered very limited opportunities for both market and affordable housing other than for single dwellings or small groups of housing on infill land. This is reflected in their designation in the settlement hierarchy. However, housing need continues to be an issue in the rural areas of the borough. A small number of minor changes are supported in reviewing the village envelopes, but these do not offer significant opportunities for new affordable homes.
- 3.3 A partnership has been established between a rural housing enabling agency (Community Development Action Hertfordshire), a Registered Provider, and the Parish Councils to identify small-scale schemes (i.e. below 15 homes in each case) for affordable homes, within and adjoining the small villages. The process involves working closely with Parish Councils to identify local housing needs and where this exists to select and develop an appropriate site(s) as a rural exception to normal policies operating in the countryside. To date a number of Parishes have been contacted and steady progress is being made. For example, in the case of Great Gaddesden and Nettleden and Potten End Parishes, the site selection process is being undertaken.
- 3.4 Such schemes must continue to protect the character of villages and the surrounding countryside. No specific allocations are recommended in order to ensure that when opportunities arise they remain as genuine exceptions for affordable homes. However, while a number of housing sites have been rejected in the countryside adjoining small villages, these may have potential as part of the future site selection process if housing need is confirmed.

4. Travelling Communities

Introduction

- 4.1 The Core Strategy notes that three travelling communities live in and visit Dacorum:
- People living in caravans:
 - Gypsies and Travellers; and
 - Travelling showpeople
 - People living in boats on the Grand Union Canal.
- 4.2 Their needs can be met by retaining existing accommodation and providing new sites.

Travellers

- 4.3 There are two existing travellers sites in the borough both of which are owned and managed by Hertfordshire County Council (Table 7).

Table 7: Existing Authorised Gypsy and Traveller Sites

Site	Number of authorised pitches
Three Cherry Trees Lane, Hemel Hempstead	30
Cheddington Lane, Long Marston	6
Total	36

- 4.4 These respectively accommodate travellers from the Irish Travellers and Romany Gypsy communities. Whilst there are often short term vacancies at the Three Cherry Trees site, these are quickly filled from the waiting list.
- 4.5 However, a number of the travelling community live in “bricks and mortar” accommodation.

National Guidance

- 4.6 When the Council consulted on its Pre-Submission Site Allocations national policy for Gypsies and Travellers was set out in the Planning Policy for Traveller Sites (March 2012) (PPTS), which accompanied the NPPF. This guidance encouraged fair and equal treatment for travellers, and urged local planning authorities to identify need and plan for future provision in appropriate locations. It recognised the sensitivity of new sites in rural areas, particularly the Green Belt, and sought to limit the number and scale of new traveller site development in open countryside.
- 4.7 However, since this stage the Government has issued its revised ‘Planning Policy for Traveller Sites’ on 31 August 2015. With regard to requirements for the Council’s plan-making activities, the majority of the text remains the same as for the previous 2012 guidance. It is important to note that the Council’s

obligations regarding making appropriate provision for Gypsies and Travellers have not changed:

- Paragraph 9: local planning authorities should set pitch targets for gypsies and travellers which address the likely need for such accommodation.
- Paragraph 10: Local planning authorities should, in producing their Local Plan, identify sites to meet their locally set targets. This includes the requirement to be able to demonstrate a 5 year supply of deliverable sites.
- Paragraph 17: Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

4.8 The changes relate to two main areas:

1. *The treatment of speculative application for sites within the Green Belt*

- with a strengthening of powers to refuse such applications, plus the inclusion of a new sentence in paragraph 27 to indicate that a lack of pitches for Gypsies and Travellers is not a reason to grant planning permission for sites in the Green Belt and other protected areas. This requirement is in the section relating to determining applications (i.e. Development Management decisions), not the section on plan-making; and

2. *The definition of Gypsies and Travellers* - the definition of 'Gypsies and Travellers' in Annex 1 has changed. The words 'or permanently' have been deleted from the end of the definition in paragraph 1 in the annex, whilst paragraph 2 in the annex is new. The new definition is as follows:

Annex 1: Glossary

1. For the purposes of this planning policy "gypsies and travellers" means:

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

2. In determining whether persons are "gypsies and travellers" for the purposes of this planning policy, consideration should be given to the following issues amongst other relevant matters:

- a) whether they previously led a nomadic habit of life
- b) the reasons for ceasing their nomadic habit of life
- c) whether there is an intention of living a nomadic habit of life in the future, and if so, how soon and in what circumstances.

4.9 The approach in the Site Allocations DPD is to allocate three small new sites within the three largest Local Allocations:

Site	Number of pitches*
LA1: Marchmont Farm, Hemel Hempstead	5
LA3: West Hemel Hempstead	7
LA5: Icknield Way, west of Tring	5
<i>Total</i>	<i>17</i>

** A pitch is the space occupied by one family or household: it may accommodate one or more caravans.*

4.10 The sites at LA1 and LA3 were already proposed to be part of the area removed from the Green Belt within the Pre-Submission Site Allocations DPD. The site at LA5 is proposed to be taken out of the Green Belt via Significant Change SC1 (and associated Minor Changes). This approach accords with Policy CS22: New Accommodation for Gypsies and Travellers of the adopted Core Strategy and the pitch target (which is expressed as a minimum figure) set out within it.

4.11 The Council has taken both internal and external legal advice regarding whether the publication of the new PPTS requires the Council to make any changes to its approach set out in the Site Allocations DPD. This advice concludes that the only legally sound way forward is to continue with this current approach. This is due to a range of reasons:

- a) The role of the Site Allocations DPD is to allocate sites in accordance with the targets and policies set out in the adopted Core Strategy. It is not the role of the Site Allocations DPD to reconsider or revise these numbers. This is consistent with the approach the Council is taking (that has been accepted by Inspectors), regarding further Green Belt releases for housing.
- b) The appropriate time to update our Gypsy and Traveller Accommodation Assessment (GTAA) is as part of a suite of technical work to inform the new Local Plan i.e. in 2016/17. If the target of 17 pitches comes down following this review, then the Council can de-allocate sites, or reduce their size, in the new single Local Plan.
- c) Processes are underway for a legal challenge by representatives of the travelling community to the new PPTS. This challenge is expected to seek the quashing of the new definition, or if this is unsuccessful, some clarity regarding the meaning of key words within it. It is unwise to change the current approach on the basis of a definition that will be subject to such challenge. It is better in both planning and legal terms to allow for discussion of the issues as part of the Site Allocations examination process, with the Inspector advising the Council to modify its plan if necessary.
- d) It is too early for the Gypsy and Traveller Unit at Herts County Council to assess the likely impact of the new PPTS upon the availability of pitches at the two existing sites within the Borough. They are therefore not yet in a

position to advise upon the new PPTS's likely impact upon overall levels of need and pitch availability in the Borough.

- e) It is not known how the change in definition will affect the Gypsy and Traveller community themselves – for example, it is quite likely that they may modify their travelling behaviour to ensure they fall within the new definition.

4.12 With regard to the allocation of sites, the Council has been unable to find any suitable sites for Gypsies and Travellers on land excluded from the Green Belt (see discussion in paragraphs 4.26-4.40 below). Therefore, we consider that exceptional circumstances exist to justify releasing land from the Green Belt, to meet the assessed need for additional accommodation. It should be noted that all three new sites will be excluded from the Green Belt. This approach is consistent with paragraph 9, 10 and 17 in the revised PPTS.

4.13 The Housing and Planning Bill is expected to make provision for Gypsy and Traveller needs to be included in the Council's overall assessment of 'objectively assessed need.' This change in approach has yet to come into effect and its implications will need to be considered once the details are known. What is clear however is that there will still be a requirement to consider Gypsy and Traveller needs when considering housing issues and drawing up planning policies and designations.

Core Strategy

4.14 Core Strategy Policies CS21: Existing Accommodation for Travelling Communities and CS22: New Accommodation for Gypsies and Travellers set out how this policy will be applied at the local level. As with conventional housing, the approach is to safeguard existing provision (Table 7). Protection of existing and future sites is essential given the difficulty in identifying sites within and outside of the built-up areas.

Traveller Needs Assessment

4.15 A Traveller Needs Assessment (TNA) has been completed⁴ for both Gypsy and Travellers and travelling showpeople. It was prepared by specialist consultants Opinion Research Services (ORS) carried out jointly with Three Rivers District Council:

<http://www.dacorum.gov.uk/docs/default-source/planning-development/trdc-and-dacorum-travellers-needs-assessment-website.pdf?Status=Master&sfvrsn=0>

⁴ Dacorum Borough Council and Three Rivers District Council Traveller Needs Assessment (January 2013)

- 4.16 This study supersedes a previous study prepared by the Centre for Urban and Regional Studies (CURS) in April 2005. The CURS study just considered Gypsy and Traveller needs, whilst the 2013 study covers the needs of both Gypsies and Travellers and travelling showpeople.
- 4.17 The TNA identified a need for 17 new pitches to address natural growth of Gypsy and Travellers already resident in the Borough over the lifetime of the plan. These needs will be met through the provision of suitable sites through the plan process. Potential locations have been suggested and assessed through technical work and consultation with the Gypsy Community, their representatives and the wider community.

New Traveller Sites

- 4.18 The Council's approach to new provision is based around mainstreaming pitch provision with bricks and mortar housing. This approach has been refined through:
- Emerging Core Strategy, which included direct consultation with the local Gypsy and Traveller community (summarised in the Report of Consultation – Volume 4 Annex B);
 - Consultation Draft Core Strategy (summarised in the Report of Consultation, Volume 6); and
 - Pre-Submission Core Strategy (summarised in the Report Representations);
 - Consultation on the Site Allocations –Issues and Options (summarised in the 2006 Report of Consultation);
 - Consultation on the Site Allocations – Supplementary Issues and Options (summarised in the 2008 Report of Consultation);
 - Supplementary Site Allocations Issues and Options Paper (November 2008) Report of Consultation: 1 Gypsy and Traveller Sites (June 2009)).
- 4.19 The approach has also had regard at the time to Government Guidance contained in the 'Planning Policy for Travellers Sites' (March 2012), which was published alongside the National Planning Policy Framework (NPPF).
- 4.20 The Council has adopted a two stage approach to new provision. The first part of the policy is contained within the Core Strategy, with the second part to follow within the Site Allocations Development Plan Document (DPD). Sites identified within the Site Allocations DPD may be supplemented by other sites that may come forward separately through the Development Management process.
- 4.21 Core Strategy Policy CS22: New Accommodation for Gypsies and Travellers sets out the general approach towards provision and provides a series of criteria against which the suitability of sites will be judged. This policy does not identify any specific sites, but gives priority to sites defined on the Proposals Map (now referred to as the Policies Map). The delivery section that follows

Policy CS22 states that sites will be identified in the Site Allocations DPD and specifies the current need to be for a minimum of 17 additional pitches.

- 4.22 Although the Core Strategy does not refer to the precise location of these sites, the Council has been clear to residents, developers, landowners, representatives of the Gypsy and Traveller community and to the Core Strategy Planning Inspector that its preferred method of provision is through the Local Allocations. This approach was set out in the Council's statement on Issue 7 (Affordable Housing, Gypsies and Travellers) for the Core Strategy examination in public. Paragraph 7.3.4 in this statement states:

"In terms of the location of sites, new pitches are expected to be provided alongside large-scale planned development, particularly the appropriate local allocations. These sites will be defined on the Proposals Map. This approach is intended to aid integration of sites with the settled community; reduce the marginalisation of the travelling communities; and ensure occupants of the sites have good access to local services and facilities such as health and education. The Council will be clearer about the appropriate and fair target to use at this time. It may or may not be necessary to supplement this supply with other identified site(s) in the Site Allocations DPD."

- 4.23 The role of the Site Allocations DPD is to define both the 5 year and 11-15 year site supply through specific site options. This position will be monitored through the Council's Annual Monitoring Report.

Size of Sites

- 4.24 The general approach of providing a number of smaller sites, rather than a few larger ones, is supported by advice from the County Council's Gypsy Liaison Officer – and is based on his extensive experience across Hertfordshire. It also reflects Government good practice guidance and feedback from the Gypsy and Traveller community themselves. Face to face consultation with the Gypsy and Traveller community by specialist consultants found that:

"All respondents without exception would like to see the provision of smaller sites in the future. Those interviewees living on larger sites felt that a site of around fifteen pitches would be a reasonable size. Whereas those living on smaller sites or who had lived on smaller sites of around six pitches felt that a site of fifteen pitches would be far too large and that sites should ideally accommodate between six to eight pitches."

- 4.25 There was a feeling amongst all those interviewed that the provision of smaller sites would result in fewer difficulties within the Gypsy and Traveller community themselves. Respondents noted a preference for living in small family groups, or with families they have a close relationship with (see Section 3.3 of Appendix 4 of Volume 4 of the Core Strategy Report of Consultation). Allowing sites to come forward with part occupation and expanding to full capacity over time reflects this feedback and will allow for easier site management and integration.

Site Selection

- 4.26 The first consultation on site options under the Site Allocations DPD ran from November 2006 to February 2007. It did not cover specific traveller sites or refer to the Scott-Wilson report. The Scott-Wilson report (see below) had not been published at that stage, the timing of publication being under discussion with the other commissioning authorities.
- 4.27 The original technical work was prepared on a South West Hertfordshire basis by consultants Scott Wilson and included a large number of sites that were coded red, amber, or green depending on the consultant's view of their suitability. All were in the Green Belt or Rural Area as no suitable urban sites were found. Many site suggestions were some distance from settlements, services and facilities and would not comply with Government guidance (or our own Core Strategy policy). In addition the emphasis was on identifying suitable locations. Landownership was not considered in the study, and therefore it was not clear how many sites in reality had reasonable prospects of actually being delivered. The full Scott Wilson Report is on the Council's website: [http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/gypsies-travellers-study-potential-sites-\(stage-2\)](http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/gypsies-travellers-study-potential-sites-(stage-2))
- 4.28 Feedback on these potential sites (and a small number of other sites brought to the Council's attention by local residents) was sought as part of the Site Allocations consultation in 2008: A summary of locations by settlement is shown in Table 8.

Table 8: Summary of locations for Gypsy and Traveller Sites by settlement considered during the 2008 Site Allocations DPD Supplementary Issues and Options consultation

Settlement	Number of locations
Hemel Hempstead	9
Berkhamsted	4
Tring	7
Bovingdon	3
Kings Langley	0
Markyate	2
Bourne End	1
Total	36

- 4.29 In reality they indicated broad locations rather than specific sites. As part of the consultation process, sites were allocated a preference score (1, 2 or 3 with 1 being the most preferable) based on a technical judgement. This part of the wider consultation generated significant levels of local interest that accounted for 89% of the total of 2,124 individual responses received. In addition there were seven petitions with 678 signatures.
- 4.30 While the Council received comments on these proposed locations, alternative site options across the Borough were also suggested. These included extensions to the existing traveller sites at Hemel Hempstead and Long

Marston (see para. 4.28 – 4.29 below), sites outside of the Borough, sites within General Employment Areas (particularly the Maylands Business Park), Bovingdon Airfield, and the New Mill Household waste site on the edge of Tring. None of these was considered to improve on the list of options in the Scott-Wilson Report for a number of reasons. These included sites:

- not being available or needed for existing or proposed uses;
- effectively duplicating options already identified in the Scott Wilson report;
- providing a poor environment for residents; and
- being poorly located in relation to services and facilities.

4.31 The direct public consultation for the 2008 Supplementary Issues and Options stage was complemented by separate surveys of the Citizens Panel and the Gypsy and Traveller community, and feedback from a series of Place Workshops (that considered site issues) ⁵. None of these ultimately added to our understanding of potentially available sites.

4.32 Following analysis of these consultation responses, a report was considered by Members regarding how and where provision should be made within the Borough. This resulted in the current policy approach of seeking to integrate sites with new ‘bricks and mortar’ housing. The relevant Cabinet Report is available online and provides a more detailed overview of the 2008 consultation process: <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0>

4.33 A brief summary of the process the Council has been through with regards to considering and assessing potential Gypsy and Traveller sites is set out in the Issues Paper the Council prepared for the Core Strategy Examination: <http://www.dacorum.gov.uk/docs/default-source/planning-development/issue-7-hearing-statement---dacorum-borough-council.pdf?Status=Master&sfvrsn=0>. This clearly explained to the Inspector the Council’s proposed approach of setting strategic policies (plus a monitoring target for new pitch provision) through the Core Strategy and identifying precise pitch locations and requirements on the three largest Local Allocations (LA1, LA3 and LA5) through the Site Allocations. The specialist consultants who prepared the Council’s latest Traveller needs Assessment (ORS) stated that the incorporation of new sites within new urban extensions was emerging as a ‘good practice’ approach.

4.34 The potential to extend the two existing Gypsy sites within the Borough has been considered and discussed with the Gypsy and Traveller Unit at Hertfordshire County Council, who own and manage both sites. They have advised that the Three Cherry Trees Lane site is already larger than the ideal site size and should not be extended.

4.35 The County Council consider that the Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the

⁵ Further detail can be found in the Core Strategy Reports of Consultation: Volumes 2 and 3 (<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/local-planning-framework/core-strategy/consultation-reports-on-the-core-strategy>)

maximum size suitable for its rural location on the edge of a village. The potential for expansion is severely limited due to land ownership (with an area of land that may have been appropriate for expansion being bought by a local farmer with the express intent of preventing this from occurring). There is also a written undertaking between the County Council and local Parish Council that there will be no further site expansion. Whilst this is not legally binding, it is a further constraint to expansion. Officers have subsequently written to the owners of land adjacent to the Long Marston site, who have confirmed that they would not support the use of their land for any future expansion of the site (see Appendix 8 and 9).

4.36 In response to representations to the Pre-Submissions consultation and the Local Allocations draft master plan the following new sites were suggested:

- The former household waste site in Tringford Road, Tring.
- Bovingdon Airfield;
- Berkhamsted
- Duckmore Lane, Tring
- the Maylands Business Park area

4.37 These suggested sites have also been considered and discounted as realistic or appropriate options. The sites and locations in the Hemel Hempstead (Maylands Business Park), Berkhamsted, Tring and Bovingdon Airfield areas have already been considered through the Scott Wilson study and consulted on as part of the 2008 Supplementary Issues and Options Paper to the Site Allocations DPD. They were not considered suitable for a number of locational and ownership reasons, bearing in mind the Council's preferred approach to provide sites as part of planned new large housing developments.

4.38 Neither the Bovingdon Airfield nor Berkhamsted locations would help meet the needs locally arising from the Tring area (as compared to the site associated with Local Allocation LA5). In addition, in consulting with the traveller community on new pitches in 2008, concern was raised regarding the potential over concentration of sites in the north east of Hemel Hempstead and within the adjoining St Albans district area. This continues to be a concern of the Council and its general preference remains for the dispersal of sites away from this area.

4.39 The Tringford Road site is no longer available as it is to be used for the replacement Council depot (the existing site in the town is to be redeveloped for housing). Duckmore Lane was not previously identified as a suitable location in the Scott Wilson study. As with the LA5 site, it too would be located in the CAONB. Part of Duckmore Lane also falls within an Area of Archaeological Significance, it is relatively less accessible from the Strategic Road Network as compared to LA5, and it is not considered to be as well integrated / related to the town. Furthermore, the Council is not aware of any landowner support for a traveller site there, and so the site is not considered to be deliverable.

4.40 No new traveller sites have emerged out of the work on the 2014 and 2015 'call for sites' exercises. In theory, a number of the larger greenfield sites being

promoted through this process could accommodate a small traveller site as part of a wider mix of uses. However, this will be a matter to consider in the future in terms of assessing needs and how they are to be accommodated, and in taking forward allocations through the new Single Local Plan.

Location of Sites and Local Allocations

- 4.41 Government guidance states that the number of pitches should be related to the circumstances of the specific size and location of the site and the surrounding population's size and density. It will also help ensure that no undue pressure is placed on local infrastructure and services and help promote peaceful and integrated co-existence between the occupants of the site and the local community.
- 4.42 Adopting a dispersed pattern of distribution is supported by feedback from the traveller community. Whether there are any other Gypsy and Traveller sites in the vicinity was a key issue for some interviewees when considering future site provision. There appear to be a number of reasons for this, the main ones being a fear that a new site could impact upon existing good relationships with the settled community. There was also recognition amongst interviewees that sites too close to each other would make it harder for integration with the settled community.
- 4.43 Issues and Options consultation on the Site Allocations (2006) asked for feedback on the Council's approach towards Gypsy and Traveller provision, whilst Supplementary Issues and Options consultation (2008) asked for views on specific sites highlighted through the Scott Wilson study. The Report of Consultation into the 2006 consultation sets out the Council's initial response to the feedback received. While significant objections were raised over the issue of detailed locations, there was strong support for suggested general locational criteria.
- 4.44 The responses to the Gypsy and Traveller sites in the 2008 consultation were reported separately from the remaining issues (Supplementary Site Allocations Issues and Options Paper (November 2008) Report of Consultation: 1 Gypsy and Traveller Sites (June 2009)). The responses helped formulate the policy principles in the report and that underpinned Policy CS22. The policy principles were reported to and approved at Cabinet on 31st March 2009. However, Cabinet did not make any specific recommendations on whether to support or reject any locations arising from the Scott Wilson report.
- 4.45 At the time of these consultations, the Core Strategy was at an early stage. The final housing target was not yet determined and it was not known that there would be the need to release land from the Green Belt to accommodate new housing. Since this time, the Core Strategy has refined the Council's approach to provision and the ORS study into Accommodation Needs for Travelling Communities has been published. This includes the following advice regarding the location of new provision for Gypsies and Travellers:

8.9 Planning Policy for Traveller Sites contains clear advice on the location for new sites, such as that they typically should not be in the Green Belt or remote rural locations where access to services is limited. However, an issue of debate across the country is how to successfully develop new sites which integrate with the surrounding area. It is common for existing communities to object to new sites being located near to them because of concerns about the impact the site will have on them.

8.10 A number of authorities across the country such as those in Worcestershire are considering incorporating sites into new housing developments and urban extensions. The aim of this is to ensure the site fully integrates with the local community from the outset and does not run into conflict with the existing population before it is developed. For an area such as Dacorum where large new housing developments are being considered this may represent a practical and effective means of delivering sustainable new Gypsy and Traveller sites.

4.46 The Local Allocations are considered to provide the best mechanism to ensure the provision of new Gypsy and Traveller pitches and to ensure these are:

- (a) Deliverable;
- (b) Well connected to local services and facilities;
- (c) Have good links to the local transport network; and
- (d) Have the ability to be well integrated with the settled community.

4.47 For Dacorum, the ORS study also notes that the needs for future pitch provision are split between Romany Gypsies and Irish Travellers. These are separate ethnic groups and while they often live together on sites, in most cases they prefer to live separately from one another. Therefore, the study advises that the Council consider making pitch provision on separate sites to allow the two ethnic groups the option of continuing to live independently.

4.48 Irish Travellers are currently focussed in the east of the Borough, around Hemel Hempstead, whilst the Romany Gypsies are focussed on the Long Marston Site, north of Tring. The recommended distribution of new pitches in Table 9 reflects this locational split.

Table 9: Summary of Reasons for Discounting Pitch Provision on Local Allocations LA2, LA4 and LA6

Site	Reasons
LA2: Old Town, Hemel Hempstead	<ul style="list-style-type: none"> • Relatively small size of site makes integration with new and existing settled community more difficult. • Topography (i.e. relatively steep slope) • The need for the architecture of the new development to appropriately respect the historic character of the Old Town Conservation Area.
LA4: Hanburys and the Old Orchard, Berkhamsted	<ul style="list-style-type: none"> • Relatively small scale of site makes integration with new and existing settled community more difficult. • Good access to A41, but actual site access onto Shootersway relatively constrained.
LA6: Chesham Road, Bovingdon	<ul style="list-style-type: none"> • Relatively small scale of site makes integration with new and existing settled community more difficult. • Relatively 'tight' nature of the site due to constraint of balancing pond.

4.49 It is recommended that the following Gypsy and Traveller pitch provision is made within Local Allocations LA1, LA3 and LA5 for the reasons summarised in Table 10.

Table 10: Summary of Reasons for Including Pitch Provision on Local Allocations LA1, LA3 and LA5

Site	Reasons	Recommended Number of Pitches
LA1: Marchmont Farm, Hemel Hempstead	<ul style="list-style-type: none"> • Size of site (i.e. sufficiently large to enable integration with new and existing settled community; • Proximity to primary road network (i.e. direct access to Link Road, with good connections with A41 and M1); • Site topography (although parts of the site are on a slope, there are areas that are sufficiently flat to accommodate traveller pitches); • Site sufficiently far from Three Cherry Trees site, whilst still being in an area preferred by Irish Travellers. 	5
LA3: West Hemel Hempstead	<ul style="list-style-type: none"> • Size of site (i.e. sufficiently large to enable integration with new and existing settled community); • Although access to the primary road network is not as immediate as for LA1, there are still relatively good connections to the A41 and M1. 	7

	<ul style="list-style-type: none"> • Site topography (although parts of the site are on a slope, there are areas that are sufficiently flat to accommodate traveller pitches) • Site sufficiently far from Three Cherry Trees site, whilst still being in an area preferred by Irish Travellers. 	
LA5: Icknield Way, Tring	<ul style="list-style-type: none"> • Size of site (i.e. sufficiently large to enable integration with new and existing settled community); • Proximity to primary road network (i.e. good access to A41 and from there the M25 and M1); • Site topography (i.e. largely flat site); • Site is located in area favoured by Romany Gypsies. It could provide a new site or act as an 'overflow' site for Long Marston; • Inclusion of site within Part 1 of the Housing Schedule allows potential for site to help meet 5 year supply of traveller accommodation (and particularly for Romany Gypsies, for whom need is most pressing). 	5

4.50 Following the Pre-Submission consultation, the Council is proposing changes to its approach to the traveller site at LA5 so as to ensure its delivery is not unnecessarily hindered. This follows advice from the Council's legal adviser on the recent clarification regarding the Government's approach to cemeteries in the Green Belt (as set out in the NPPF) through a judgement from the Court of Appeal⁶. As a result of this case, the Council's legal adviser recommends that the cemetery extension site that also forms part of Local Allocation LA5 is excluded from the Green Belt in the Site Allocations document. He has also advised that for consistency with the approach to the cemetery, and the approach to the Gypsy and Traveller Sites on LA1 and LA3, the adjacent Gypsy and Traveller site is also excluded from the Green Belt.

4.51 In addition to the above provision (which meets the minimum level of need identified in the latest TNA, the Council will continue to liaise with the Gypsy and Traveller Unit at Hertfordshire County Council to explore the potential to improve the integration of the Three Cherry Trees site with the settled community, as part of the development of Spencers Park and other development within the East Hemel Hempstead Area Action Plan. As stated previously, the Council has also investigated with the County Council extending the existing Long Marston Site. It wrote to the adjoining site landowners in April

⁶ Timmins and Lymn Family Funeral Service v. Gedling Borough Council and Westerleigh Group. Judgement issued March 2014.

2015 and they made clear that this was something they would not want to pursue.

- 4.52 Applications for Gypsy and Traveller pitches / sites elsewhere within the Borough will continue to be assessed against the criteria in Core Strategy Policy CS22 and relevant national guidance. For example, there remains on-going interest in a private development for 8 pitches on the outskirts of Bovington on the Hempstead Road. An initial application (4/2324/13) was refused and a current application (4/2187/15) has yet to be determined. However, the Council continues to be concerned over its impact on the Green Belt and whether the proposal has been properly justified as very special circumstances.

Management of Sites

- 4.53 Both existing Gypsy and Traveller sites within Dacorum are managed by Hertfordshire County Council's Gypsy and Traveller Unit. They are run in a similar way to Council housing i.e. families rent their pitches, pay the appropriate rate of Council tax and are responsible for their own utility bills.
- 4.54 Hertfordshire County Council has indicated that they would prefer not to take on responsibility for the running of future sites – although this has not formally been ruled out as an option.
- 4.55 The 2013 Gypsy and Traveller Needs Assessment considers the issue of site management. It notes that whilst the pitch requirement for Dacorum is drawn from households on public site waiting lists and also from household formation on public sites, this is not the only form of provision.

^{7.32} An option which we would advise Dacorum to consider is, rather than seek to develop new public sites and pitches, to develop a private rented sector for Gypsies and Travellers in the authority. These sites are typically owned and managed by Gypsies and Travellers and accept households in receipt of housing benefit. This could potentially allow the need for public site pitches to be met on private sites by mirroring the role of housing benefit support in the private rented sector in housing.

- 4.56 This advice is supported by Hertfordshire County Council's Gypsy Liaison Unit, who has advised that there are many benefits to the Gypsy and Traveller community owning and/or managing their own sites. It is therefore the approach that is recommended for the management of sites within the Local Allocations.

Transit Provision

- 4.57 Transit sites serve a specific function of meeting the needs of Gypsies and Traveller households who are visiting an area or who are passing through on

the way to somewhere else. They do not have a function in meeting local need, which must be addressed through permanent (residential) sites.

- 4.58 There is currently no specific transit provision within Dacorum. The closest provision is at South Mimms, in Hertsmere. This site has 15 pitches and capacity for 30 caravans.
- 4.59 The 2013 Traveller Needs Assessment concludes that there is no identified need for transit provision within Dacorum. This position will be reviewed through subsequent Traveller Needs assessment and may also benefit from further consideration at a strategic level, through technical work on a county-wide level. The need for a strategic view of transit provision is currently being considered by the Hertfordshire Planning Group (HPG).
- 4.60 The conclusion of any such additional technical work will be reflected in the early partial review of the Core Strategy
- 4.61 Local Allocation LA5: Icknield Way, west of Tring is available for delivery at any time (see Part 1 of the Schedule of Housing Proposals and Sites). The Council will consider the need to bring forward the Gypsy and Traveller pitches on either LA1: Marchmont Farm or LA3: West Hemel Hempstead earlier than currently programmed (i.e. before 2021), should provision be required to ensure a 5 year supply of pitches. Decisions on such action will be informed by the Annual Monitoring Report process.

Responses Received to the Pre-Submission Site Allocations

- 4.62 Very few representations were received affecting this section of the Site Allocations document. Most of the objections stemmed from comments directed at the three local allocations LA1, LA3 and LA5 (and their associated master plans) where the new traveller sites are proposed.
- 4.63 Representations were made objecting to the principle of locating gypsy and traveller sites within Local Allocation (LA) sites, citing National Policy regarding the Green Belt. Objections were raised to the general principle of providing such sites and whether they accord with Government policy, particularly in relation to the Green Belt. The Council is satisfied that its approach to new sites is appropriate and is supported by technical work and the County's Gypsy and Travellers team. There is identified need for new pitches that the Council is obliged to meet, there is an absence of realistic alternatives, and all of the locations are now to be eventually released from the Green Belt.
- 4.64 The Council is satisfied that its approach to locating gypsy and traveller sites on three of the LA sites is sound and justified in accordance with National Policy. There is identified need for new pitches that the Council is obliged to meet, there is an absence of realistic alternatives, and all of the locations are now to be eventually released from the Green Belt. The decision to integrate new sites with new 'bricks and mortar' housing was taken by the Council in 2008 and subsequently incorporated into the Core Strategy, where it was considered sound by the inspector. Consideration has been given to the potential to

extend the existing sites in the Borough but is not appropriate as set out in the Homes and Community Services Background Paper.

- 4.65 The majority of objections were directed at the traveller site associated with LA5 with the principal objector being Cala Homes, the proposed developer. These raised concerns over the impact of the site on the Green Belt and CAONB, the extent to which alternatives have been considered and its impact on viability. The Council is satisfied that these factors have been properly taken into account in planning for the site (although additional landscaping works are required to reduce its impact on the CAONB) and that other locations have been explored. The proposal should remain given the lack of realistic local alternatives, particularly following the outcome of exploring the expansion of the existing Long Marston site.
- 4.66 New sites and locations were suggested by local residents in the Hemel Hempstead (Maylands Business Park), Berkhamsted, Tring and Bovingdon Airfield areas. However, these were not felt suitable for a number of locational and ownership reasons, bearing in mind the Council's preferred approach to provide sites as part of planned new large housing developments.

Responses Received to the Focused Changes

- 4.67 There were a small number of individual comments of objections to the specific changes related to the proposed removal of the cemetery extension and Gypsy and Traveller site at LA5: Icknield Way, Tring from the Green Belt (SC1 and SC7). The issue of the perceived conflict between the Council's plan and national Government policy relating to Green Belt and provision for Gypsies and Travellers was also cited. It was argued that no exceptional circumstances have been set out to justify the proposed release and that this conflicted with the latest Government planning policy for traveller sites.
- 4.68 The reasons for the changes to the Green Belt boundary were summarised in the Cabinet Report of 21st July 2015. The reasons for this change remain valid, and legal advice received recommends that the Council incorporates these changes within the Site Allocations DPD submitted to the Planning Inspectorate. The Council consider that its approach to the provision of a traveller site at LA5 (and at LA1 and LA3) is in accordance with current national policy (see above). The revised policy does not alter the Council's obligation to identify suitable sites to provide for the needs of the gypsy and traveller community. The criteria for selecting suitable sites have not changed from that in the 2012 policy statement. Thus it is still reflective of the approach set out in the Council's Core Strategy policy which informed the selection of the sites at the three Local Allocations LA1, LA3 and LA5.

Travelling Showpeople

- 4.69 The Core Strategy notes that there is little demand for pitches within Dacorum. This reflects the findings of the latest Traveller Needs Assessment (January 2013).

- 4.70 It is therefore not recommended that additional provision is made for this group within the Site Allocations DPD. Existing pitches will however be protected in accordance with Policy CS21 of the Core Strategy. This approach reflects the advice of the 2013 Traveller Needs Assessment.

Residential Moorings

- 4.71 Residential moorings along the Grand Union Canal (GUC) have offered an opportunity for relatively low cost accommodation in the borough. The approach has been to accommodate demand through planned sites in order to safeguard the canal environment and to help reduce problems of unauthorised moorings.
- 4.72 The issue of the provision of additional moorings on the GUC approach was set out in the Council's statement on Issue 16 (Countryside) for the Core Strategy examination in public. Paragraphs 16.4.1-16.4.3 in this statement state:

"This is a detailed issue that the Council considers is more appropriate to be covered within the Development Management DPD rather than the Core Strategy.

Paragraph 26.11 of the Core Strategy does however recognise the potential for "sustainable tourism" within the area. It states that "the Grand Union Canal is an important historic, environmental and leisure asset. A number of boating facilities are available in the area and additional mooring basins will not be supported." This approach reflects the recent provision of a new mooring basin a Dickinson Quay as part of the Apsley Lock development in Hemel Hempstead (32 moorings), whilst an existing marina at Cow Roast (between Berkhamsted and Tring) accommodates an additional 110 boats. There has also been a new mooring basin created just north of the Borough at Grove Lock, south of Leighton Buzzard. There is therefore not considered to be a requirement for additional provision during the plan period. This approach is supported by British Waterways (which since July 2012 has become the Canal and River Trust).

Policies 83: Recreation along the Grand Union Canal, and Policy 84: Location of Recreation Mooring Basins and Lay-bys on the Grand Union Canal of the Dacorum Borough Local Plan remains 'saved.' Policy 83 states that the canal and its environments will be protected and promoted as a recreational and environmental resource by joint action with British Waterway and other agencies. The development of low-key canalside recreational facilities will be considered provided there is no adverse effect on the value of the canal for nature conservation. Policy 84 relates specifically to moorings and allows for appropriate, generally small-scale recreational moorings and laybys in urban areas and in the Green Belt outside of the AONB, subject to a number of criteria. Moorings within the AONB are more strictly controlled. This policy approach will be reviewed through the Development Management DPD."

- 4.73 A proposed site for permanent moorings adjacent to the Grand Union Canal at Cow Roast along the A4251, has been put forward as part of the response to the recent call for sites in 2014. Given the position of the Core Strategy on new moorings and the site's sensitive location within wider open countryside between Northchurch and Tring falling within the CAONB, it cannot be supported as an allocation.

Appendices:

Providing Homes

Please see the '*Providing Homes and Community Services Background Issues Paper Technical Appendices*' document

B. Providing Community Services

5. Providing Community Services

Introduction

- 5.1 The well-being of Dacorum's communities depends on having the appropriate social infrastructure. Future development should meet the needs of new and existing communities and create a sustainable balance between housing, jobs and social infrastructure to ensure that Dacorum can continue to function successfully as a community.
- 5.2 Social infrastructure needs are provided by a variety of agencies to the needs of all people in Dacorum. The Council has worked extensively in partnership with a range of agencies particular Hertfordshire County Council, Hertfordshire Community NHS Trust and Herts Valley Clinical Commissioning Group (CCG) to ensure sufficient facilities are planned to meet the needs of existing and future communities in the Borough.
- 5.3 Social and Community facilities will be delivered through Strategic Sites, site allocations, Local Allocations and associated Masterplans as developed under the Core Strategy and to be progressed through the Site Allocations DPD.

National Policy

- 5.4 In relation to social infrastructure, the NPPF identifies one of the 'Core Planning Principles' is for Local Planning Authorities to take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
- 5.5 Further to this, the NPPF also suggests that local planning authorities should work with public health leads and health organisations. This is to understand and take account of the health status and needs of the local population, including expected future changes, and any information about relevant barriers to improving health and well-being.

Core Strategy and 'Saved' Policies

- 5.6 Dacorum's Core Strategy was adopted on 26 September 2013 and sets a clear strategic policy framework through which to progress the Site Allocations DPD.
- 5.7 Policies that relate directly to social infrastructure include:

POLICY CS23: Social Infrastructure

Social infrastructure providing services and facilities to the community will be encouraged.

New infrastructure will be:

- Located to aid accessibility; and
- Designed to allow for different activities

The dual use of new and existing facilities will be encouraged wherever possible.

The provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt. Zones will be defined in the Green Belt where there is clear evidence of need: the effect of new building and activity on the Green Belt must, however to be minimised.

Existing social infrastructure will be protected unless appropriate alternative provision is made, or satisfactory evidence is provided to prove the facility is no longer viable. The re-use of a building for an alternative social or community service or facility is preferred.

All new development will be expected to contribute towards the provision of social infrastructure. For larger developments this may include land and/or buildings.

Core Strategy extract – Figure 14: Social Infrastructure

Social Infrastructure includes:

- Early years education to further education
- Primary and secondary health care
- Community buildings and facilities for childcare, community care, general welfare , worship and social contact
- Specialist facilities such as a prison
- Job centre and related facilities
- Cemeteries
- Premises for emergency services and related facilities such as fire hydrants
- Open space, outdoor leisure and indoor sports facilities
- Libraries and
- Building and facilities for culture, including arts and entertainments, and civic duties.

Assessment of Sites

- 5.8 The Schedule of Site Appraisals 2006, 2008 and 2014 highlights a list of sites submitted for consideration. The sites for consideration have come from a number of sources that span several years of consultation as well as technical studies and suggestions from service providers such as Hertfordshire County Council. All sites considered to have potential for allocation have been assessed within the matrix contained within Appendix 2 of this document.
- 5.9 The proposals that were included in the Local Plan 2004 have also been reassessed for either their continued inclusion, or for deletion. It should be noted that proposals within the Area Action Plan area for East Hemel Hempstead are being saved and, if the document is taken forward, will be reconsidered as part of technical work to inform that Development Plan Document.
- 5.10 Sites have been assessed in accordance with the latest local planning policy and the suitability of the site to be taken forward taking into account variants such as site size, location, planning history, specific designations that may prevent development. The need for particular uses is set out in the relevant sections below.
- 5.11 In addition to this, the Core Strategy 2013 identifies six Local Allocations; these are focused on providing housing, but due to the size of several of them, certain allocations contain social and community developments as well.
- 5.12 The following list illustrates where the sites for consideration have been sourced from –
- Schedule of Site Appraisals 2006
 - Schedule of Site Appraisals 2008
 - Schedule of Site Appraisals 2014
 - Dacorum Borough Local Plan 1991-2011 (adopted 2004)
 - Core Strategy (adopted 2013) – including Local Allocations and Strategic Sites (see below)
 - Hemel Hempstead Town Centre Masterplan (adopted as SPD in September 2013).
 - Technical Studies
 - Advice from service providers such as Hertfordshire County Council
 - Infrastructure Delivery Plan (June 2015)
- 5.13 The Local Allocations and Strategic Sites identified in the Core Strategy will significantly increase the number of new homes in the Borough, creating a need for additional social and community facilities. Table 1 illustrates an overview of the social and community uses as part of these sites.

Table 1: New Social and Community Facilities required for Local Allocations and Strategic Sites

Site ref.	Address	Proposal
Hemel Hempstead:		
LA1	Marchmont Farm	<ul style="list-style-type: none"> • Extend Margaret Lloyd Park
LA3	West Hemel Hempstead	<ul style="list-style-type: none"> • Doctors surgery • New 2fe primary school • Other social and community facilities
Berkhamsted:		
SS1	Land at Durrants Lane Shootersway (Egerton Rothesay School)	<ul style="list-style-type: none"> • Remodelling and extension of existing school • Dual use and community playing fields • Informal leisure space
Tring:		
LA5	Icknield Way, west of Tring	<ul style="list-style-type: none"> • Playing fields and open space • Extension to the cemetery
Bovingdon:		
LA6	Chesham Road/ Molyneaux Avenue	<ul style="list-style-type: none"> • Open space
Markyate		
SS2	Land at Hicks Road, Markyate	<ul style="list-style-type: none"> • Replacement surgery • New public space • Replacement car parking • Residential care home

Education

5.14 The Core Strategy sets out that the Council will support the provision of and access to services and facilities to meet future demands, this includes the expansion of existing schools and / or provision of new schools to meet identified needs. The Council has worked closely with Hertfordshire County Council (as the local education authority) with regards to education need in the Borough for existing and future communities.

5.15 The Local Allocations and other developments will increase the number of housing in the Borough, thereby creating a need for further education places. In Hemel Hempstead for example, this need will be met through the construction of a new primary school through the Local Allocation LA3 in West Hemel Hempstead. Not all educational need will be satisfied through the construction of new schools and not all Local Allocations justify the provision of completely new schools. Consideration has also been given to maximising the use of existing primary and secondary schools by accommodating extensions.

- 5.16 The Major Developed Site (MDS) designations in the Green Belt cover the secondary schools at Ashlyns School, Berkhamsted, and Kings Langley and these sites provide some flexibility to accommodate new and upgraded facilities. The Site Allocations also proposes to designate Abotts Hill School as a MDS. This is a private school.
- 5.17 The Core Strategy identifies two education zones in the Green Belt around Berkhamsted (as shown on the Vision Diagram in the Place Strategy). These have been carried forward into the Site Allocations DPD and Policies Map to allow the County Council the necessary flexibility to plan for future growth in school places, and accommodate the change from a three to two tier education system. A similar approach is proposed in the Site Allocations DPD for the Nash Mills area of Hemel Hempstead. A new education zone, grouped around Red Lion Lane, has been identified to help meet the need for additional primary school places in the south east of the town. Education Zones will define 'areas of search' for new primary school sites and allow the detailed feasibility of site options to be explored in more detail by the local education authority.
- 5.18 The need for additional secondary school provision to serve future housing in north east Hemel Hempstead will be considered through either the East Hemel Hempstead Area Action Plan or on an individual local authority basis through Dacorum Borough Council's or St. Albans City and District Council's Local Plans. Additional primary school provision is likely to be provided through Phase 2 of the development at Spencer's Park.
- 5.19 Future pupil demands across the Borough will continue to be modelled and any changes in needs identified in annual updates to the Infrastructure Delivery Plan.
- 5.20 Discussions with Hertfordshire County Council have taken place in preparation for the Site Allocations, and subsequently following consultation on the Pre-submission version of the DPD, with a view to anticipating the future need for schools. Hertfordshire County Council is the local education authority and has a duty to secure sufficient school places in its administrative area, ensuring that every child has access to a school place. The County Council has a need for further primary school facilities within the Borough. Below is a synopsis of the educational needs for the plan period.

Infrastructure Delivery Plan (IDP)

- 5.21 Dacorum Infrastructure Delivery Plan (InDP) Update June 2015 provides an assessment of the infrastructure required to support the existing and planned levels of housing and employment development within the Borough up to 2031 as set out within the Core Strategy. The InDP is an assessment that has mainly been informed by discussions with infrastructure providers and reflects their plans and strategies. The tables below (Table 2 and Table 3) illustrate the projected future requirements for primary school and secondary school provision in the Borough up to 2031 along with the anticipated costs associated.

Table 2: Requirements for additional Primary School Provision to 2031

Primary Planning Area	Estimated Pupil Yield arising from housing planned in the Core Strategy	Requirement for additional primary provision	How it will be provided	Estimated cost of additional primary provision
Hemel Hempstead North East	10.4 -17.6 f.e.	2 f.e.	Plans for an additional 2 f.e provided either through the expansion of existing schools or through provision of a new school on a site owned by HCC (see paragraph 5.28)	£8.32m (based on the estimated cost of expansion of two existing schools).
Hemel Hempstead East to serve development in Hemel Hempstead and St. Albans		2 f.e.	New 2FE primary school (to be delivered through Phase 2 of Spencer's Park) to serve Dacourm's planned growth in east Hemel Hempstead . Potential additional primary school provision to result from development within St. Albans City & District to the east of Hemel Hempstead.	£7.64m plus land
Hemel Hempstead South East		2 f.e.	New 2 f.e. school. HCC are currently undertaking feasibility work to provide a new school upon identified sites within Nash Mills Education Zone (EZ/1).	£7.64m plus land
Hemel Hempstead West and		2 f.e.	New 2 f.e. school as part of LA3 delivered via	£7.64m plus land

North West			section 106 agreement(s) (not CIL able).	
Hemel Hempstead Town Centre		2 f.e.	New 2 f.e. school upon the hospital site (MU/2) delivered through S.106 agreement(s).	£7.64m plus land
Hemel Hempstead Reserve Sites		4 f.e.	Sites for two new schools	Subject to review
Berkhamsted	1.4 – 2.4 f.e.	Up to 4 f.e.	Dependant on the phasing of housing and the impact of the move to two tier education system. However the 1180 dwellings required over the Core Strategy plan period only justifies the range of education of yield 1.4 to 2.4 f.e.	£7.64m plus land if required.
Tring	0.6 – 0.9 f.e.	N/A	Through existing latent capacity.	There may be costs associated with refurbishment and/or expansion if required.
Kings Langley	0.1 – 0.2 f.e.	N/A	Through existing capacity (N.B. the proposed school at SE Hemel Hempstead will free up capacity)	There may be costs associated with refurbishment and/or expansion if required.
Bovingdon	0.2 – 0.3 f.e.	N/A	Through existing latent capacity.	There may be costs associated with refurbishment and/or expansion if required.

Markyate	0.2 – 0.4 f.e.	N/A	Through existing latent capacity. Refurbishment and/or expansion may be required.	N/A – the cost of expansion have been secured through extant planning permission for large sites within the settlement.
Countryside	0.5 – 0.8 f.e.	N/A	Through existing latent capacity.	There may be costs associated with refurbishment and/or expansion if required.
Total	13.4 – 22.6 f.e.	14. f.e. (+4 f.e. in reserve)		£46.52m plus land costs

Table 3 Requirements for additional Secondary School Provision to 2031

Area	Estimated Pupil Yield arising from housing planned in the Core Strategy	How it will be met
Hemel Hempstead	10.3 f.e.	<p>Through existing capacity and expansion of existing secondary schools. Contributions would be required to expand existing schools.</p> <p>However, should the large scale allocation of around 2,500 dwellings in St. Albans City & District (east of Hemel Hempstead) be brought forward, a new 6-8 f.e. secondary school site would be sought. Additional school places required to serve Hemel Hempstead town could also be provided at that new school. In that instance, contributions would be sought toward development of that school.</p>
Berkhamsted	1.4 f.e.	Expansion of Ashlyns School (within Site Allocation EZ/2) to provide up to 10 f.e.
Tring	0.6 f.e.	Through capacity within existing secondary schools. If Tring Secondary School requires expansion there would be a requirement for detached playing fields to be provided elsewhere.

		This has been recognised through the Site Allocations DPD and land at Dunsley Farm for detached playing fields has been included as an allocation.
Kings Langley	0.1 f.e.	Through capacity within existing secondary schools. However, contributions may be required to expand existing schools if necessary.
Bovingdon	0.2 f.e.	
Markyate	0.2 f.e.	Given that many pupils from Markyate travel to Harpenden secondary schools, contributions may be required to extend existing schools and/or facilitate a new school if necessary.
Countryside	0.5 f.e.	Through capacity within existing secondary schools. However, contributions may be required to expand existing schools if necessary.
Total	13.1 f.e.	Largely through capacity within existing secondary schools, although some extensions may be required.

Primary Schools

5.22 A number of smaller primary schools in the Hemel Hempstead area have closed in recent years, following a review of primary school provision in the town undertaken by the County Council.

5.23 *Martindale Primary School* was closed as part of this review and is being sold by the County Council as a housing site. The view of the County Council is that, even though demand for primary school places is again rising, this school is not in the right location to meet these needs, or its buildings of an appropriate standard. The site has since been included within the Site Allocations DPD for proposed housing (H/13 within the Pre-submission Site Allocations DPD).

5.24 *Jupiter Drive School* also closed a number of years ago as part of the primary school review. A planning application for the construction of a new 2 f.e. primary school building, early years provision and a nursery facility was granted permission by Hertfordshire County Council (as local education authority) in April 2014 (Dacorum consultation ref. 4/00145/14/CMA). The school opened at its new site in Jupiter Drive with full occupancy in May 2015.

5.25 *Barncroft School* on Washington Avenue in Hemel Hempstead was closed in 2007 and left vacant for a number of years. The site was brought back into use as an education support centre.

Local Allocation LA3 West Hemel

5.26 Local Housing Allocation LA3 – West Hemel will deliver a 2-form entry primary school as part of the overall development. The proposed development will accommodate 900 new homes; therefore there is solid justification for a new primary school to serve the new community as well as serving the surrounding

areas. The school will be delivered through appropriate contributions by way of a Section 106 agreement.

Hemel Hempstead Hospital Site

5.27 The redevelopment of the Town Centre and the Hospital Site (proposal MU/2 within the Site Allocations DPD) will result in a new hospital, approximately 200 new homes and new 2-form entry primary school within the town centre. It is recognised that urban schools could be challenging to deliver given the limited availability of developable land, for this reason detached shared playing fields would be acceptable.

5.28 Any new school facility within the town centre would be funded through Community Infrastructure Levy. A new school within Hemel Hempstead town centre would be welcomed given the changing face of the town centre in terms of increased number of flatted accommodation as a result of recent changes to Permitted Development where former offices have been changed to residential without the need for planning permission.

Land adjacent to Astley Cooper School

5.29 As a result of school place forecasting, Hertfordshire County Council has identified a need for school places within the 'Hemel Hempstead North East Primary Planning Area' through their Children's Services 'Service Update (November 2014)'. This need can either be met through the expansion of existing schools or through provision of a new school. Hertfordshire County Council has identified an area of land on the existing Astley Cooper School site at St Agnell's Lane in north east Hemel Hempstead which could potentially accommodate a new 2 form entry primary school and provide these additional primary school places.

East Hemel Hempstead Area Action Plan Area

5.30 Hertfordshire County Council has identified a need for additional primary school capacity in east Hemel Hempstead in previously submitted representations (Section 5.10 of HCC services response on Dacorum Core Strategy Draft for Consultation November 2010 and section 3.33 of HCC response of behalf of HCC services) and subsequently in response to the Pre-submission Site Allocations DPD (2014) (section 2.0 of the HCC Services response).

5.31 A new 2 form entry primary school site should therefore be identified to serve the potential 1,000 new homes that would be delivered through development in east Hemel Hempstead. These homes will be delivered through Phases 1 and 2 of the Spencer's Park development, as reflected in amended paragraph 7.10 of the Pre-submission Site Allocations DPD (change reference MC61), and also through development within the Heart of Maylands area (c.400 homes).

5.32 The emerging St Albans City and District Council Strategic Local Plan (SLP) has identified two allocations providing a combined total of a further 2,500 dwellings to the east of Hemel Hempstead. Hertfordshire County Council has

advised St Albans City and District Council that East Hemel Hempstead North allocation (1,500 dwellings) generates a requirement for two 2-form entry primary schools. In terms of feasibility, it may be that the second school would initially be built as a one-form entry school on a site that is capable of supporting further expansion to create a two-form entry school. Additionally, the second allocation at East Hemel Hempstead South (1,000 dwellings) would generate a requirement for a further two-form entry primary school.

South East Hemel Hempstead

5.33 Hertfordshire County Council has identified the need to plan for a 2-form entry primary school to serve the South East Hemel Hempstead area to accommodate recent housing developments in the Apsley and Two Waters area. This was identified as an area of need in the previously submitted representations to the Core Strategy and in the Infrastructure Delivery Plan Updates for both 2014 and 2015. It is noted that the three areas identified by HCC are located within the Green Belt and, at the time of identification, site analysis of each potential location had not been completed. Consequently, an Education Zone (EZ/1) around the Nash Mills area has been allocated within the Site Allocations DPD to ensure that a site for a primary school is identified and delivered to meet future needs.

Secondary Schools

5.34 Hertfordshire County Council are responsible for ensuring there are sufficient secondary school places for residents within Dacorum. Kings Langley and Longdean Secondary Schools received central Government funding for their redevelopment through the Priority Building Schools Programme. More recently, The Cavendish School, Astley Cooper School and Hemel Hempstead School in Hemel Hempstead and Tring School have also received funding through a further allocation from the Priority Building Schools Programme.

5.35 In addition to the sites referred to below, the County Council have also advised that, should 2,500 homes be delivered in St Albans to the east of Hemel Hempstead as set out in St Albans City and District Council's Pre-submission draft Strategic Local Plan (2014), there would be a need for a new 6-8 form entry secondary school. Identification of a suitable site will be explored and included either within the forthcoming East Hemel Hempstead Area Action Plan or through the individual local planning authority's Local Plans.

Kings Langley School

5.36 Under planning reference 4/00909/14/MFA, planning permission has been granted for the demolition of the existing school building and construction of a new three storey secondary school with hard and soft play areas, playing fields, car parking, and re-configuration of car and bus drop off areas, landscaping and associated works.. This permission was granted in October 2014 and construction has commenced on site.

5.37 The school is designated as a Major Developed Site in the Green Belt. As a result of the comprehensive redevelopment of the school site, the appropriate 'infill' area for this Major Developed Site designation will be reconsidered as part of the early partial review of the Core Strategy. See also the Background Issues Paper on the Sustainable Development Strategy.

Longdean School, Hemel Hempstead

5.38 In November 2014 the school gained planning permission for the demolition of existing buildings and construction of a replacement school (planning reference 4/01487/14/MFA). Construction is currently ongoing and the school remains operational during this period.

Education Zones

5.39 Hertfordshire County Council has identified that further accommodation in the existing secondary schools or a new secondary school will be needed in Berkhamsted.

5.40 The Core Strategy identifies two Education Zones in the Green Belt that could provide secondary and primary schools in Berkhamsted. The County Council are in agreement with DBC that both education zones should be taken forward into the Site Allocations DPD. At this stage there is some uncertainty about where potential school places are likely to be needed. For this reason, it is recommended that both Education Zones should be retained to provide appropriate flexibility for the future.

Education Summary

- New primary schools will be delivered as required as part of the Local Allocations and Strategic Sites and through implementation of the Hemel Hempstead Town Centre Master Plan. Local Housing LA3 West Hemel Hempstead and the Hospital Site at Hemel Hempstead (MU/2) will each deliver new primary schools.
- A new 2-form entry school site will be required in east Hemel Hempstead to serve the potential 1,000 new homes that would be delivered through Phases 1 and 2 of the Spencer's Park development and through development in the Heart of Maylands (c.400 homes).
- Jupiter Drive School was closed a number of years ago as part of a review of primary schools in the town. Planning permission was subsequently granted by Hertfordshire County Council for demolition of the existing buildings and construction of a new school. Dacorum Borough Council were consulted on the proposal and raised no objections (planning reference 4/0145/14/CMA). The school has now opened as Jupiter Community Free School and has been fully operational since May 2015.
- The Core Strategy identifies two Education Zones in the Green Belt in Berkhamsted which have been taken forward into the Site Allocations

DPD to provide for future secondary and primary schools as a result of school restructuring within the town. A further Education Zone will be introduced in the South East Area of Hemel Hempstead because Hertfordshire County Council has identified the need to plan for a 2- form entry primary school to serve the South East Hemel Hempstead area to accommodate recent housing developments at Two Waters Way and the Apsley area of the town.

- Astley Cooper School site at St Agnell's Lane in north east Hemel Hempstead is identified as having potential to provide a new 2-form entry primary school should it be required. Additional primary school places within the north east Hemel Primary Planning Area could either be provided through this new site or as a result of expanding existing schools.
- Barncroft School on Washington Avenue in Hemel Hempstead was closed in 2007 and left vacant for a number of years. The site was brought back into use as an education support centre.
- Pixies Hill Primary School, Hemel Hempstead, is currently operating as a single form entry school.

5.41 The table below highlights a list of all sites that were suggested as potential sites for development and explains the reasons why these sites were not considered for allocation within the Site Allocations DPD. The table contains a list of school sites put forward by Hertfordshire County Council as part of the 2006 and 2008 Issues and Options consultation exercises.

Table 4: Site Assessment for Education

Ref	Address	Site Appraisal	Category	Comments	Action
H/h55	Martindale Primary School, Boxted Road, Hemel Hempstead	2006	Social / Community to residential / mixed	Loss of a former school site that is located within a residential area. CS23 states that existing social infrastructure will be protected unless appropriate alternative is made or satisfactory evidence is provided to prove the facility is no longer viable. The site is located within in a sustainable location with access to existing services and facilities and would be considered a brownfield site. Do not progress – a planning application has	Do not progress to the next stage.

				been approved to redevelop this site for a residential development (4/00925/14/MOA)	
H/h56	Pixies Hill JMI School, Pixies Hill Crescent, Hemel Hempstead	2006	Social / Community to residential / mixed	Loss of a former school site that is located within a residential area. CS23 states that existing social infrastructure will be protected unless appropriate alternative is made or satisfactory evidence is provided to prove the facility is no longer viable. The site is located within in a sustainable location with access to existing services and facilities and would be considered a brownfield site.	Do not progress to the next stage.
H/h57	Barncroft Primary School, Washington Avenue, Hemel Hempstead	2006	Social / Community to residential / mixed	Loss of a former school site that is located within a residential area. CS23 states that existing social infrastructure will be protected unless appropriate alternative is made or satisfactory evidence is provided to prove the facility is no longer viable. The site is located within in a sustainable location with access to existing services and facilities and would be considered a brownfield site. Barncroft School is now in use as a educational support centre (ESC).	Do not progress to the next stage.
H/h58	Jupiter Drive JMI School, Jupiter	2006	Social / Community to residential	Loss of a former school site that is located within a residential area. CS23 states that existing	Do not progress to the next

	Drive, Hemel Hempstead		/ mixed	social infrastructure will be protected unless appropriate alternative is made or satisfactory evidence is provided to prove the facility is no longer viable. The site is located within in a sustainable location with access to existing services and facilities and would be considered a brownfield site. Planning permission has been implemented for a new 2 f.e. primary school on the site – do not progress.	stage.
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Health

5.42 The Core Strategy seeks to protect existing healthcare uses unless replaced or it is demonstrated they are no longer required or viable. Additional sites are allocated to meet key additional requirements and needs. It is recommended that existing unimplemented proposals are retained where appropriate.

5.43 The Infrastructure Delivery Plan Update (InDP) (2015) identifies both current and planned investment in both primary and secondary healthcare within Dacorum.

Primary Healthcare

5.44 In general terms, the InDP states that the population of Dacorum is at present well served in terms of capacity of primary services, though there are some local areas of deficiency where surgeries are over-crowded. Development to the west of Hemel Hempstead at Local Allocation LA3 will include either the expansion of the existing Parkwood Surgery or the construction of a new surgery on the application site.

5.45 Paragraphs 4.34 and 4.35 of the InDP highlights recently committed and planned investments in primary healthcare. Notably, there is an extant planning permission for the relocation and expansion of Highfield Medical Centre from its current location in Jupiter Drive, Hemel Hempstead to a location near the Highfield local centre (4/00803/13/FUL). Relevant planning conditions have been discharged and construction of the new building began in March 2015.

- 5.46 Parkwood Surgery has applied for approximately £1-2 million through NHS England's Primary Care Infrastructure Fund bidding process as part of the Five Year Forward View strategy (October 2014). This investment, along with smaller investments toward improvements at Kings Langley (The Nap) Surgery, has been agreed in principle subject to final approval. If successful the funds would be utilised to provide additional consulting rooms and parking at the existing site.

Secondary Healthcare

- 5.47 The main investment project relating to secondary healthcare in Dacorum is the redevelopment of Hemel Hempstead Local General Hospital. The budget of the scheme has not been confirmed and Herts Valley Clinical Commission Group (HVCCG) is currently assessing health care needs. It is however estimated that the costs for a new or reconfigured hospital building would be between £25 - 30 million.
- 5.48 The Hemel Hempstead Town Centre Masterplan identifies the importance of the Hospital Zone in securing a replacement local general hospital and new 2 form entry primary school, alongside housing. The County Council, in partnership with the Hospital Trust, have prepared a feasibility study for the site, principally to explore the most appropriate location for the primary school on this site. The Trust is yet to confirm their requirements and preferred option for hospital provision and the exact location of the hospital within the site. The scale of health provision on this site is dependent upon the need to provide services, which is to be identified by the HVCCG and Hospital Trust. In recognising these development needs, the site is included within the Pre-submission Site Allocations DPD as a mixed-use proposal (MU/2). However, it may be some time before the scope of the reconstituted hospital services to be provided at the site is known.
- 5.49 It is likely that increases in Dacorum's population to 2031 will place additional pressure on all secondary healthcare services in the borough and surrounding areas. The changing age profile of the borough's population is also likely to have an impact on secondary healthcare needs, as certain age groups are likely to utilise healthcare services more than others.
- 5.50 Given the pattern of Dacorum's planned housing growth, it is likely that the greatest future need will be in Hemel Hempstead. In this respect, the location of new Local General Hospital will fit the location of new demand.

Table 5: Site Assessment for Health

Ref	Address	Site Appraisal	Category	Comments	Action
H/h3	Hemel Hempstead Hospital (Proposed	2006	Social / Community to residential	The site is located within the town centre. The redevelopment of this site would result in the	Allocate as a mixed use site

	Site C5 in adopted Dacorum Borough Local Plan)		/ mixed	loss of an existing hospital facility. However, the site forms part of the Town Centre redevelopment masterplan and are under consideration for development of a new healthcare facility and housing.	(MU/2).
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Community

5.51 The Council sees great value in investing in existing and new community facilities in the Borough. It seeks to create and enhance an environment where the vibrancy and diversity of culture inspire people who live, work in and visit the Borough, thereby bringing economic success.

5.52 Planning applications that provide new, or enhance existing, community facilities will be supported in principle by the Council through the Core Strategy.

Sites to be taken forward

5.53 The Amaravati Buddhist Monastery at Great Gaddesden is an important community asset amongst the Buddhist community. Many of the buildings on site are in poor condition and in need of replacement; as such a redevelopment of this site will come forward in the future. A phased and sensitive approach to new facilities sufficient for their needs is encouraged. An allocation will help support future planned change on the site given its sensitive rural location. The landowners and agents have prepared their own Masterplan for the site to help guide future development. Although this Masterplan has not been formally endorsed by the Council, this document will be a material planning consideration. A planning application for the construction of a nursing kuti has already been considered by the Council and granted planning permission in March 2015 (planning ref. 4/03608/14/FUL). This signals the start of redevelopment and improvement works at the monastery site which will be assisted and managed through the area defined within the Site Allocations DPD (Proposal C/2).

5.54 There is also need to make provision for additional burial space within the Borough. Initially this will be delivered through Local Allocation LA5 in west Tring whereby an extension to the existing cemetery off Aylesbury Road is proposed (Proposal C/1). Further work on the size and location of this extension has been published separately. Looking forward, there is a need to plan for future burial space, particularly in the Hemel Hempstead area of the Borough. Therefore, in addition to existing space at Woodwells Cemetery, land at Bunkers Park has been identified to deliver a mix of leisure uses and cemetery space (Proposal MU/5). The uses at this site will be coordinated

through the preparation of a Master Plan taking into account the possible relocation of Leverstock Green Tennis Club (to allow Proposal H/7 to deliver new homes), the provision of burial space to meet the Borough's needs and the sensitivities of the site which is located in the Green Belt and designated as Open Land.

Sites not to be taken forward

Maylands Business Area and adjoining land, Hemel Hempstead

5.55 The 2008 Schedule of Site Appraisals identified a proposal for a police facility at Maylands Business area outlined in the table below. The proposal would accommodate cells whilst a town centre police station would deal with the day to day police services. Under the Town Centre Masterplan the existing police station will be redeveloped as part of the Public Service Quarter redevelopment. However, it is understood that the police are no longer wishing to relocate to this site and it is being offered to the open market. As this site forms part of the East Hemel Hempstead Area Action Plan area, the future use(s) for this site will be assessed through either the East Hemel Hempstead Area Action Plan or through progression of the Council's new Single Local Plan. Therefore the site will not be covered by the Site Allocations DPD and will therefore not be allocated at this stage.

Greenhills Day Centre

5.56 The 2008 Schedule of Site Appraisals identifies Greenhills Day Centre for potential redevelopment of the site to residential. No justification for the loss of this community facility has been presented to the Council and the site is still needed for service purposes by the County Council.

5.57 Table 6 below illustrates a total of three sites that have been considered for community uses. The table illustrates that only one site will be taken forward for the reasons outlined within comments section of the table.

Table 6: Site Assessment for Community Uses

Ref	Address	Site Appraisal	Category	Comments	Action
H/C4	Maylands Business Area and adjoining land, Hemel Hempstead	2008	Other to Residential	Loss of employment and open space, the applicant seeks to locate a new Type 2 police station with an approximate floor area of 1000sqm (cells, parking, admin, warehouse etc.) in this location. It is noted that the proposed PSQ	Do not progress

				<p>development would accommodate a smaller town centre police station. It is envisaged that the Maylands site would accommodate cells. Site should be considered in the context of the Maylands Masterplan. CS23 supports the development of new social infrastructure sites. New infrastructure will be located to aid accessibility and designed to allow for different activities. Discussions are taking place at present for the development of this site with the Council's Economic Well Being Team. This site will not be progressed as the site forms part of the East Hemel Hempstead Area Action Plan area and therefore will not be covered by the Site Allocations DPD.</p>	
H/h78	Greenhills Day Centre, Tenzing Road, Hemel Hempstead	2008	Social and Community to Residential	<p>Residential development should not result in a loss of an existing leisure facility. Any new development would have to be carefully designed taking into account the open character of the site. CS23 states that existing social infrastructure will be protected unless appropriate alternative is made or satisfactory</p>	Do not progress

				evidence is provided to prove the facility is no longer viable without an alternative facility being provided. The site is located within an existing residential and well established area of Adyefield with excellent access to facilities and services.	
O/c1	Amaravati Buddhist Monastery, Great Gaddesden	2014	Rural Area to Social / Community	The Amravati Buddhist is an existing community use on this site and has been established for many years. The existing buildings on site are in poor condition and will need replacing in the future to remain fit for purpose	Site to be allocated.

6. Leisure and Cultural

Leisure

- 6.1 The National Planning Policy Framework (NPPF) encourages local planning authorities to have in place up-to-date information on the supply and demand for playing facilities:

'Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.' (Paragraph 73)

- 6.2 The NPPF is also keen to see existing provision protected:

'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.'*

(Paragraph 74)

- 6.3 In this respect, the Council has commissioned and carried out a variety of studies in order to inform the leisure side of the evidence base for its Local Planning Framework. These are technical studies which help inform the key documents and associated policies that make up the new Local Plan for the Borough. The Council recognises the importance of keeping the evidence base up to date in commissioning the quantitative side of this leisure study.

Supporting Technical Documents

- 6.4 The following technical documents have been commissioned by DBC –

1. Social and Community Facilities Study January 2006 – Dacorum Borough Council
2. Dacorum Sport and Recreation Study – March 2006 – Indoor Facilities – Knight Kavanagh & Page)
3. Dacorum Sport and Recreation Study – Outdoor Sports Facilities – October 2006 – Knight Kavanagh & Page

4. Town Stadium Complex – At Hemel Hempstead Feasibility Study – June 2009- PMP Generis
5. Dacorum Town Stadium Feasibility Study Phase 2– June 2010 – PMP Generis
6. Sports Facilities Audit 2011 – Jan 2012 – Dacorum Borough Council
7. Sports Policy Statement and Action Plan – April 2012 – Dacorum Borough Council
8. Outdoor Leisure Facilities Study – Assessment Report – September 2014 – Knight Kavanagh & Page
9. Dacorum Playing Pitch Strategy and Action Plan – June 2015 – Knight Kavanagh & Page

Assessment

- 6.5 The Core Strategy identifies a community sports facility for Hemel Hempstead. This is something that may be needed to support possible expansion to the east of Hemel Hempstead. As such, it can be considered through either the East Hemel Hempstead Area Action Plan or the single Dacorum Local Plan and may free up existing leisure facilities for other leisure uses or alternative development.
- 6.6 The evidence base includes updates to the Infrastructure Delivery Plan (with the latest iteration published in June 2015) which has played a key role in identifying social infrastructure needs over the plan period. The Council continues to work closely with primary agencies to ensure sufficient facilities are planned and delivered.
- 6.7 Technical reports such as the Sports Facilities Audit 2012 considered the impact of future population projections in a time of uncertainty for the Council's housing target. The Sports Facilities Audit considered the impact of the population projections associated with the two housing levels on sports participation and used quantitative standards to determine what the additional demand for sports facilities would be.
- 6.8 Since the assessment a new full size Synthetic Turf Pitch (STP) has been delivered at Ashlyn's School Berkhamsted and a new 5-a-side pitch has been delivered at Hemel Hempstead Football Club. The Sports Facilities Audit also found a deficit in existing supply of health and fitness. Since the assessment a new gym opened in Hemel Hempstead town centre.
- 6.9 In 2013, the Council commissioned a new Playing Pitch Study and Action Plan. This culminated in an assessment of outdoor leisure facilities (published in September 2014) and subsequently the aforementioned Playing Pitch Strategy and Action Plan (published June 2015) which highlighted the key areas of need for new or improved facilities to meet demands. These studies and key actions were formulated in collaboration with key stakeholders including Dacorum Sports Trust, national governing bodies for various outdoor sports, local sports clubs, and relevant Council services.

- 6.10 The Hemel Hempstead Town Centre Masterplan indicates that new informal leisure space can be brought forward on adjoining land at Paradise Fields linked to the redevelopment of the hospital site and associated uses.
- 6.11 Support can be given in principle to allow for the relocation of the Leverstock Green Tennis Club to Bunkers Park as part of a mix of other community and open recreational uses. The move would result in enabling housing development on the tennis club's current site. However, housing development cannot proceed until an alternative site is secured. Further technical work is needed to assess whether an exception to normal policy can be fully justified in the light of the Bunker's Park location within the Green Belt, the facility's current siting in Open Land, and that there are no other suitable alternative non-Green Belt sites available. Once feasibility work has been completed regarding the development options at Bunkers Park, delivery of the site and relocation of the tennis club is likely to be supported by the preparation of a master plan document.
- 6.12 The table below highlights all sites that have been considered for leisure uses. The suggested sites stem from consultations that took place during 2006, 2008 and 2014. An additional site has also been inserted following consultation on the Pre-submission Site Allocations DPD in late 2014. This relates to the provision of detached playing fields on land at Dunsley Farm in Tring (owned by Hertfordshire County Council).
- 6.13 The Tring Place Strategy contained within the adopted Core Strategy (2013) recognises the need for the redevelopment and enhancement of educational facilities at Tring Secondary School. This is identified as a local objective – to accommodate the expansion of Tring School (page 165 of the Core Strategy) – and in paragraph 22.3 of the document:
- 'Facilities for Tring Secondary School will need to be extended and additional, detached playing fields provided. The location of these new playing fields will be identified through the Site Allocations DPD: dual use will be sought.'*
- 6.14 Therefore, in also recognising the spatial constraints within this site, it has been identified that land would need to be allocated elsewhere to provide detached playing fields for the school's use (as above). In collaboration with Hertfordshire County Council, land at Dunsley Farm off London Road in Tring has been identified for the provision of detached playing fields and this site has been identified as a significant change to the Pre-submission Site Allocations DPD will be included in a revised version of the DPD ahead of submission for independent examination.
- 6.15 The action column indicates which sites will be taken forward or not progressed with the reasoning behind the decision made contained within the comments column.

Table 7: Site Assessment for Leisure Uses

Ref	Address	Site Appraisal Schedule	Category	Comments	Action
Hemel Hempstead					
H/h80	Leverstock Green Lawn Tennis Club, Grasmere Close, Hemel Hempstead	2008	Leisure to Residential	Residential development should not result in a loss of an existing leisure facility. CS23 states that existing social infrastructure will be protected unless appropriate alternative is made or satisfactory evidence is provided to prove the facility is no longer viable. The 2013 Leisure Study does identify a surplus of tennis clubs and playing facilities in the Hemel Area, as such the loss of this facility would not be acceptable without an alternative facility being provided. The site is located within an existing residential and well established area with good access to facilities and services.	Progress to the next stage.
H/L7	Sappi (Site B), Belswains Lane, Hemel Hempstead	2008	Green Belt to Leisure	The site is located on the edge of the Nash Mills Wharf development. The site is separated from the overall Nash Mills Wharf development by Red Lion Road. It would appear that the site is / was used as a parking area for the former paper mill and for construction vehicles. As this car parking is no longer required, and the site is in the Green Belt, it would recommended that site is reinstated as a greenfield so as to protect the openness of the Green Belt and to demarcate the Green Belt Boundary.	Do not progress to the next stage.
Tring					
T/L3	Land west of Cow Lane, Tring	2006	Green Belt to Leisure	The site is located in the Green Belt where leisure uses are considered to be acceptable. Concerns are	Do not Progress to the next

				raised regarding the overall size of the site at 40 ha. In addition to this, the 2013 Leisure Study does not identify a specific need for new pitches in Tring. The site could be considered for future development for leisure.	stage
T/L4	Land east of Cow Lane, Tring	2006	Green Belt to Leisure	Concerns are raised regarding the overall size of the site at 40 ha. In addition to this, the 2013 Leisure Study does not identify a specific need for new pitches in Tring. The site could be considered for future development for leisure.	Do not Progress to the next stage
O/L2	Land at A4251 London Road, Cow Roast, Tring	2014	Green Belt to Leisure/Tourism	Sensitive greenfield and Green Belt site falling with the CAONB and lying adjacent to the Grand Union Canal. Also part of an Area of Archaeological Significance. While the site has been subject to tip soil and may represent poor quality agricultural land, it is open and undeveloped and forms part of wider open countryside between Northchurch and Tring. The Core Strategy recognises that opportunities for residential moorings will be limited, that boating facilities are already available within and adjoining the borough, and that any additional mooring basin will be directed away from open countryside. There is therefore not considered to be a requirement for additional provision during the plan period, and this approach is supported by British Waterways (which since July 2012 has become the Canal and River Trust). In addition, moorings within the CAONB	Do not Progress to the next stage

				are more strictly controlled under (saved) Policy 84.	
L/4 (Site Allocations reference)	Land at Dunsley Farm, London Road, Tring	n/a	Agricultural to Leisure Use	The site is located in the Green Belt where outdoor sports and recreational uses are generally considered appropriate. The need for detached playing fields in the event that Tring Secondary School is expanded is identified in the Core Strategy (Tring Place Strategy). Opportunity for dual, community use of these pitches. Dacorum's Playing Pitch Strategy and Action Plan (2015) identify the need for additional playing pitches in Tring to address increased demand and overplay issues at local sports clubs.	Progress to the next stage
Kings Langley					
KL/L1	Rectory Farm, Hempstead Road, Kings Langley	2006	Green Belt to Leisure	Agricultural to Leisure use. Would be an opportunity to enhance a wildlife corridor in the village.	Do not Progress to the next stage
KL/L2	Rucklers Wood, Rucklers Lane, Kings Langley	2006	Green Belt to Leisure	The site is 0.2 ha of woodland that is part of the Wildlife Site (75/007 - The Nucket). Need to consider if there is a need to allocate this small site that is already in woodland / amenity use at present.	Do not Progress to the next stage

Note: Following feedback on the Pre-Submission DPD a new leisure designation to provide detached playing fields for Tring School has been added via the Focused Changes process. See sections 8 and 9.

Cultural Facilities

6.16 No representations have been forthcoming for the designation of land for cultural uses as part of the Site Allocations DPD. However, there have been a number of planning applications from small organisations seeking changes of use on a temporary basis until more suitable accommodation has been located. Representations were also received to the Core Strategy regarding the wording of the Hemel Hempstead Place Strategy with regard to its lack of reference to providing a replacement for the former Pavilion.

- 6.17 Recent plans to regenerate the town centre in Hemel Hempstead and the Old Town have acted as a catalyst for cultural and tourist facilities. Plans are in place and work is underway to regenerate the Town Centre of Hemel Hempstead as well as the Water Gardens. Improvement works to the public realm of the Old Town and refurbishments to the Old Town Hall have also recently been completed.

Theatre facility

- 6.18 A proposal for a theatre facility within Hemel Hempstead is no longer part of the Hemel Hempstead Town Centre Masterplan. Instead the role of the existing Old Town Hall venue has been increased to maximise the use of this facility.

The Bury – Queensway Hemel Hempstead

- 6.19 The Bury in Hemel Hempstead is a former 17th century house set in attractive grounds. The building is currently in use as a registry office and is operated by the County Council, although this use is due to cease shortly and the service relocate to the new Council offices. The building is likely to accommodate a museum facility in the future (subject to planning permission). There is no need to make a specific allocation in the Site Allocations for this museum use, as it is considered to be an acceptable activity within this building that is currently in a community use.

Library

- 6.20 Hertfordshire County Council and the Borough Council are both in support of the replacement of the existing main library in Hemel Hempstead town centre. The library will be replaced as part of the regeneration and redevelopment of the town centre Public Service Quarter that forms part of the Hemel Hempstead Town Centre Masterplan (now referred to as 'The Forum').

Summary for Cultural Uses

- 6.21 No specific representations have been forthcoming for the designation of land for cultural uses as part of consultation on the Pre-submission Site Allocations DPD. Policy CS23 of the Core Strategy seeks to protect existing community and social uses that would include cultural facilities. In addition to this, existing social infrastructure will be protected unless appropriate alternative provision is made, or satisfactory evidence is provided to prove the facility is no longer viable. The re-use of a building for an alternative social or community service or facility is preferred.
- 6.22 Whilst there are no sites for new cultural facilities, the Council is committed to protecting existing cultural facilities and supporting opportunities for new provision as and when they arise. This includes in the case of Hemel Hempstead maximising the use of the existing Old Town Hall, providing a museum facility at The Bury, and the provision of a new library as part of the proposed new Public Service Quarter (The Forum).

Conclusion and Recommendations

6.23 The Council seeks to work closely with primary agencies to ensure there is sufficient community infrastructure to serve existing and future residents of the Borough. Some needs such as new schools and doctors surgeries will be met through the delivery of the Local Allocations linked to the provision of large greenfield housing development, and via the Strategic Sites.

6.24 A list of sites has been selected from consultations in 2006 and 2008. The Schedule of Site Appraisals 2006 and 2008 highlights a definitive list of sites put forward for consideration. These sites have been assessed within the matrix contained within Appendix 2 of this document.

6.25 The following three tables below illustrate the designations relating to social infrastructure that will be delivered through the Site Allocations DPD.

Table 8: Sites to be brought forward to the Site Allocations DPD: Contribution from key local allocations and Strategic Sites

Site ref.	Address	Proposal
Hemel Hempstead:		
LA3	West Hemel Hempstead	<ul style="list-style-type: none"> • Doctors surgery • New 2 f.e. primary school • Other social and community facilities
Berkhamsted:		
SS1	Land at Durrants Lane Shootersway (Egerton Rothesay School)	<ul style="list-style-type: none"> • Remodelling and extension of existing school • Dual use and community playing fields
Tring:		
LA5	Icknield Way, west of Tring	<ul style="list-style-type: none"> • Playing fields and open space • Extension to the cemetery

Table 9: Extract From Schedule of Social and Community Proposals and Sites

Hemel Hempstead	
MU/1	
Location	West Herts College site and Civic Zone, c/o Queensway/Marlowes/Combe Street (north)/Leighton Buzzard Road
Site Area (Ha)	See Schedule of Mixed Use Proposals and Sites
MU/2	
Location	Hemel Hempstead Hospital Site, Hillfield Road
Site Area (Ha)	See Schedule of Mixed Use Proposals and Sites
Berkhamsted	
MU/6	
Location	Land at Durrants Lane Shootersway (Egerton Rothesay School)
Site Area (Ha)	See Schedule of Mixed Use Proposals and Sites
Planning Requirements:	
Tring	
C/1	
Location:	Land west of Tring
Site Area: (Ha)	
Planning Requirements:	Provision of detached extension to Tring Cemetery. Access from Aylesbury Road. Site to be well landscaped (particularly along its boundaries), appropriate to its location within the Chilterns Area of Outstanding Natural Beauty – design details to be discussed with the Chilterns Conservation Board to ensure the proposal does not have an adverse effect on the AONB and its setting. Undertake protected species surveys and incorporate appropriate requirements into any planning application to ensure there would be no adverse impacts. To also include appropriate parking area (of at least 30 spaces) and ancillary building and yard within the adjacent development area (i.e. land excluded from the Green Belt) to meet service needs.
Countryside	
C/2	
Location:	Amaravati Buddhist Monastery, St Margarets Lane, Great Gaddesden
Site Area: (Ha)	3.0
Planning Requirements:	Phased approach to redevelopment of existing previously developed part of the site. The design, layout and scale of development to be guided by its sensitive location in the Chilterns Area of Outstanding Natural Beauty, open setting and the ability of St Margarets Lane to serve the site. Advice to be sought from the Chilterns Conservation Board at the design stage, including taking account of the Chilterns Building Design Guide and associated Technical Guidance Notes. Existing landscaping to be retained and, where appropriate, enhanced. Replacement of some of the existing buildings within the

	previously developed part of the site is acceptable provided they are of a high quality of design. Significant intensification of current activities on the site will not be acceptable.
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Table 10: Schedule of Leisure Proposals and Sites

Hemel Hempstead	
L/1	
Location	Market Square and Bus Station, Marlowes / Waterhouse Street
Site Area (Ha)	0.5
Planning Requirements	Development to be guided by Town Centre Master Plan (Gade Zone). Mixed development for leisure, food, residential and offices. To follow implementation of Transport Proposal T/2.
MU/2	
Location	Hemel Hempstead Hospital Site, Hillfield Road
Site Area (Ha)	See Schedule of Mixed Use Proposals and Sites
Planning Requirements	
MU/5	
Location	Bunkers Park, Bunkers Lane
Site Area (Ha)	See Schedule of Mixed Use Proposals and Sites
Planning Requirements	
Berkhamsted	
L/2	
Location	Land at Durrants Lane Shootersway (Egerton Rothesay School)
Site Area (Ha)	2.0
Planning Requirements	Proposal linked to bringing forward formal and informal leisure space elements of Mixed Use proposal MU/6. Development to be guided by requirements set out under Proposal SS1 in the Core Strategy and associated masterplan.
MU/6	
Location	Land at Durrants Lane / Shootersway, Berkhamsted (Egerton Rothesay School)
Site Area (Ha)	2.0
Planning Requirements	See Schedule of Mixed Use Proposals and Sites
Tring	
L/3	
Location	Land west of Local Allocation LA5: Icknield Way
Site Area (Ha)	2.0
Planning Requirements	Proposal linked to bringing forward public open space as part of Local Allocation LA5. Provide an east-west footpath/cycleway from the development area to the A41 roundabout. Provide a mix of parkland and informal open space and consider inclusion of pitches for outdoor sports. Retain and enhance existing hedgerows and tree belts and provide new native tree planting and wildlife habitats. Provide a neighbourhood equipped play area. See site masterplan.
L/4 (Note: new proposal introduced via Focused Changes process)	
Location	Land at Dunsley Farm, London Road, Tring
Site Area (Ha)	2.7
Planning Requirements	Proposal linked to the potential future redevelopment of Tring Secondary School to make provision for detached playing fields in

	the event that they should be required as a result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England's standards. These playing pitches will be also made available for community use.
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7. Open Land Designation Review

Introduction

- 7.1 Open land within Dacorum's towns and villages are an integral part of the character of each place. It provides for amenity space, acts as the 'green lungs' for an urban area, enhances the visual appearance and setting of a place, and provides for sports and play facilities. There are Open Land areas within the towns that link between areas like neighbourhoods, town centres, local centres and transport facilities. This helps to meet some aims of green infrastructure, promoting non-vehicular forms of transport, and visual green corridors through the urban environment.
- 7.2 Representations have been made in the past during public consultations, including the recent consultation on the Pre-submission Site Allocations DPD, that have promoted sites to be allocated as Open Land, argued for some to be removed from the Open Land status, and for some sites to be extended. These public consultation exercises have also resulted in representations of support for sites that are designated or proposed to be designated as Open Land.
- 7.3 There is significant pressure on land in Dacorum for housing development. The continued protection and designation of Open Land aims to maintain a structured approach to planning for green spaces within towns and villages in Dacorum that are not afforded Green Belt protection.

Existing Policy and Evidence Base

- 7.4 The National Planning Policy Framework (NPPF) recognises that '*...some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage or food production)*' (paragraph 17). Section 8 of the NPPF on promoting healthy communities also acknowledges that access to quality open spaces can make an important contribution to the health and wellbeing of the community, and states that existing open space should not be built on. Provision should be planned positively and be based on robust and up to date evidence.
- 7.5 This is closely linked with the social, community and leisure aspects on planning. The purpose of this assessment is to focus on the Open Land aspect and assess sites in terms of their contribution to open and green character and purpose. Particular uses of open land, such as leisure will be assessed in their relevant Issues Paper.
- 7.6 Local Plan Policy 9 was superseded by Policy CS4 when the Core Strategy was adopted in September 2013. This sets out the overarching principle of Open Land. Policy 116 of the Local Plan (2004) was saved when the Core Strategy was adopted, and provides development management principles for determining planning applications.

POLICY CS4: The Towns and Large Villages

Development will be guided to the appropriate areas within settlements.

In residential areas appropriate residential development is encouraged. Non-residential development for small-scale social, community, leisure and business purposes is also encouraged, provided it is compatible with its surroundings.

In General Employment Areas appropriate employment generating development is encouraged.

In town centres and local centres a mix of uses is sought. The following uses are encouraged:

- (a) shopping uses (including financial and professional services and catering establishments);
- (b) compatible leisure uses;
- (c) business uses, including offices;
- (d) residential uses; and
- (e) social and community uses.

Shopping, business development and residential uses will be controlled to enable a broad range of uses to be maintained or achieved.

A high density of development, linked to the achievement of sustainability objectives, is generally supported. The mixed use of individual buildings is also generally encouraged.

In open land areas the primary planning purpose is to maintain the generally open character. Development proposals will be assessed against relevant open land policies.

Mixed-use development will be supported where it supports the principles of sustainable development and does not conflict with other policies.

In all areas, ancillary uses will be acceptable and protected, provided that they support the primary function of that area.

POLICY 116 OPEN LAND IN TOWNS AND LARGE VILLAGES

Open land forming part of the urban structure will be protected from building and other inappropriate development by applying the general provisions of Policy 9. Ancillary buildings and works, additions, replacement and redevelopment of buildings and changes of use must satisfy the conditions below:

- (a) the location, scale and use of the new development must be well related to the character of existing development, its use and its open land setting;
- (b) the integrity and future of the wider area of open land in which the new development is set must not be compromised;
- (c) in addition, in the case of sites which accommodate existing uses regarded as inappropriate to an open land area, proposals must:
 - (i) not have a significant adverse impact on the character and environment of the site or its open land setting; or
 - (ii) result in overall environmental improvements to the site in relation to its open land setting.

Proposals to develop on other open land in towns and large villages will be assessed on the basis of the local contribution the land makes to leisure facilities, townscape, visual amenity, nature conservation and the general environment.

Measures to conserve and improve the attractiveness, variety and usefulness of all open land will be investigated, encouraged and promoted.

7.7 The purpose of designating Open Land has not changed since the Local Plan was adopted in 2004. Policy 116 of the Local Plan (extract provided above) will be reassessed for its relevance in preparation of the new Single Local Plan. The assessment of Open Land sites will not therefore result in any of the Core Strategy or Local Plan policies being superseded.

7.8 The Open Space Study (2008) concluded that the main areas of deficiency of Open Land were in Markyate, Bovingdon and Berkhamsted. These settlements are limited in terms of their overall capacity and therefore have less opportunity for the provision of additional open space. It is also acknowledged that the smaller settlements tend to have good access to the countryside.

Existing Open Land Sites

7.9 There is a presumption against removing the designation of Open Land to enable future development of any sites. Despite receiving representations in response to the Pre-submission Site Allocations DPD (specifically concerning St Mary's Convent in Boxmoor and land between Adeyfield and Highfield off Woodhall Lane, which are both located in Hemel Hempstead), all existing Open Land designations set out within the Proposals Map will be carried forward and no re-assessment of these sites will be conducted at this stage of the Local

Plan process. The Council consider that there is sufficient flexibility within the abovementioned development plan policies to ensure that development is not entirely precluded from sites designated as Open Land.

Assessment of Sites

7.10 Sites to be designated either as entirely new sites or extensions to existing Open Land sites have been assessed in the following manner:

- Source – Assessments include those contained within the 2006, 2008 and 2014 Schedule of Site Appraisals, and conclusions from the Open Space Study (2008). Sites which were not deemed to be suitable to progress at the time of these site appraisals and study have not been considered further for designation within the Site Allocations DPD.
- Size threshold – Sites should be over 1ha due to the implied significant contribution of the open land to the urban form and structure;
- Criteria – consideration of existing and proposed uses of the site
- Built form – it is noted that some sites contain existing development but it is the general open character of the site that is important to the overall structure of the town

7.11 The matrix in Appendix 4 sets out the site assessments for all site representations that have not previously been considered acceptable. For completeness, a summary of the sites that have previously been discounted are listed below:

2006 Site Appraisals:

- H/h73 Land at Horseshoe Ground, Leverstock Green Road, Hemel Hempstead

2008 Site Appraisals:

- H/h83 Two Waters East, Hemel Hempstead
- H/h91 Land adjacent to Highfield House, Jupiter Drive, Hemel Hempstead
- H/o2 Woodland between Hawthorn Lane and Martindale Road (0.59 ha)
- H/o3 Warners End Wood (3.0 ha)
- H/o4 Trouvere Park (0.57)
- H/o5 Brickmakers Lane Allotments (0.58 ha)
- H/o6 Dell at the Crofts (0.32 ha)
- H/o7 Longdean School and Woodfield School (1.24 ha)
- H/o9 Martindale School (1.4 ha)
- H/o11 Woodland Belt off Tewin Road (0.31 ha)

- H/o13 Datchet Close (0.24 ha)
- H/o14 Adjoining Howe Grove (0.5 ha)
- Be/o1 St Mary's Church grounds (0.28 ha)
- Be/o2 Bridle Way (0.94 ha)
- Be/o3 Victoria C of E School (0.42 ha)
- Be/o4 St Peter's Church grounds (0.23 ha)
- Be/o6 Swing Gate School (0.49 ha)
- T/o1 St Francis de Sale School, Aylesbury Road (1.8 ha)
- Bov/o1 Old Dean (0.28 ha)
- Bov/o2 Lancaster Drive (0.20 ha)

2014 Site Appraisals:

- 22 / 22A Two Waters Road;
- Lock Cottage, off Station Road (West of Two Waters Road);
- Woodhall, Woodhall Lane

7.12 The Open Land designation seeks to protect land over 1 hectare in area where it makes a significant contribution to the form and character of the settlement. It does not seek to safeguard all areas of open land. Therefore, the majority of sites in the lists above were too small to warrant designation. It has been determined previously that other reasons for the exclusion of sites include their current Green Belt status, and the proportion of the site dominated by non-conforming uses (i.e. built form). In addition, other statutory designations may be a reason not to allocate additional land, such as TPOs, Listed buildings or Conservation Areas, where on balance with the reasons for protecting Open Land, such designations may unnecessarily restrict development for alternative reasons.

7.13 In addition, sites were identified in previous Schedule of Site Appraisals that should be considered for the specific proposals in the forthcoming East Hemel Hempstead AAP, including:

- H/I5 Lucas Sports Ground, Breakspear Way

New Open Land Sites

7.14 As a result of the assessment process conducted so far in regard to the Core Strategy and preparation of the Site Allocations DPD, a number of new (and extended) Open Land designations have been progressed to the Site Allocations DPD, including the following:

- Hobletts Manor School, Hemel Hempstead (OL/1*)⁷
- Hunting Gate Wood as an extension to Margaret Lloyd Park (OL/2*)

⁷ The * denotes the corresponding Site Allocations reference/proposal number.

- Tree belt parallel to Maylands Avenue (from Maddox Road to Wood Lane End), Hemel Hempstead (OL/3*)
- Berkley Square/Cuffley Court/Bayford Close, Hemel Hempstead (OL/4*)
- Edgeworth House, High Street, Berkhamsted (OL/5*)

7.15 These sites have been identified through the aforementioned Site Appraisal exercises (2006, 2008 or 2014) and considered within the Open Space Study (2008). The reasons for allocating these sites are set out below.

Hobletts Manor School, Hemel Hempstead (OL/1):

7.16 The site is synonymous with Hobletts Manor School site in the Adeyfield part of Hemel Hempstead and includes the school buildings, playing fields and other open space within the educational use of the site. The proposed designation of the site as Open Land was first recommended in the Open Space Study (2008) and included the 2008 Schedule of Site Appraisals (site ref. H/o8). Appendix 4 of this document recognises that the site is characterised as including substantial school grounds containing playing fields and significant green space covering 3.24 Ha. As is the case with other, similar school sites in Hemel Hempstead, the site is therefore recommended for designation as Open Land.

Hunting Gate Wood, Hemel Hempstead (OL/2):

7.17 The site consists of a woodland corridor containing a footpath which extends from the southern tip of Margaret Lloyd Park to Aycliffe Drive in Grovehill, Hemel Hempstead. This site forms a key green corridor within the urban grain and makes a significant contribution to the character of the settlement providing local residents with valuable access to open space. The proposed designation (0.95 Ha) would result in an extension to the existing Open Land at Margaret Lloyd Park and provide a natural pedestrian link for the future residents of Local Allocation LA1 at Marchmont Farm to local services offered at Henry Wells Square off Aycliffe Drive.

7.18 In the 2008 Schedule of Site Appraisals it was recommended that this site (along with others) should not be progressed to the next stage as it just fell short of the size threshold for designating Open Land (see paragraph 7.9 above). However, within the Open Space Study (2008) and following consultation on the 2008 Issues and Options stage of the Site Allocations DPD, the site (site ref. H/o1) was subsequently recognised as providing a link to existing designated Open Land and was therefore recommended to be progressed to the next stage as an extension to Margaret Lloyd Park Open Land.

Maylands Avenue Tree Belt (Maddox Road to Wood Lane End), Hemel Hempstead (OL/3):

7.19 Forming a tree belt between the commercial and industrial uses to the west of Maylands Avenue and residential properties in Adeyfield, the site is considered to be an important boundary and element of green infrastructure offering protection between sensitive uses and employment sites. The Open Space

Study (2008) identified several areas deficient in open space, including north east and east Hemel Hempstead, and therefore recommends the additional designation of the woodland belt to the west of Maylands Avenue between St Albans Road and Wood Lane End (sections 6.2 and 10.1).

- 7.20 The Maylands Master Plan Planning Policy Statement includes a Green and Landscape Strategy for the area which also highlights this woodland belt as existing infrastructure that should be retained to achieve a 'greening of Maylands' (section 4). As such, albeit slightly below the size threshold (0.85 Ha) the site is recommended to be progressed to the next stage of the Site Allocations process.

Berkley Square/Cuffley Court/Bayford Close, Hemel Hempstead (OL/4):

- 7.21 The open land adjoining the flats around Berkley Square/Cuffley Court/Bayford Close in Woodhall Farm, Hemel Hempstead (measuring 2.35 Ha) forms attractive amenity land and connects the built-up, residential area with the adjoining countryside.

- 7.22 As referred to above in respect of OL/3, the Open Space Study (2008) identified several areas deficient in open space, including within north east and east Hemel Hempstead. As such, the study also recommends the additional designation of this area adjoining the residential suburb of Woodhall Farm. The 2008 Schedule of Site Appraisals also recognises that this site can make a significant contribution to the greening and nature conservation of this otherwise urban residential area. It is also accessible to a number of local residents.

Edgeworth House, Berkhamsted (OL/5):

- 7.23 The site falls within the curtilage of an existing residential property within the built-up area of Berkhamsted. The land to the rear of Edgeworth House (which is a Grade II* Listed Building) consists of a well screened and mature garden which is traversed by the River Bulbourne (a tributary connecting to the River Gade at Two Waters) with the Grand Union Canal adjacent to the northern boundary (which itself is a green corridor designated as Open Land). The site is not accessible for public use given its private ownership. However, as one of the few remaining open green spaces within Berkhamsted and Northchurch, the gardens associated with this property (measuring a total of 1.6 ha) adds value to the setting of this heritage asset and makes an important contribution to the character and appearance of the listed building. Also, the green wooded environment creates an attractive setting in this otherwise urbanised area and seeks to enhance the existing Open Land designation synonymous with the Grand Union Canal, which currently serves as an important green chain running through Berkhamsted and Northchurch.

- 7.24 This site has been previously considered through various site appraisals in preparation of the Core Strategy and subsequently the Site Allocations DPD. The 2006 Schedule of Site Appraisals assessed the site for residential development in terms of urban capacity (site ref. BW9) but recognised

limitations of the site relating to the designated heritage asset, area of site at risk of flooding and the value of the open land within the site. The 2008 Schedule of Site Appraisals considered the site for proposed designation to Open Land (site ref. Be/o5), as identified through the Open Space Study (2008). The appraisal identified that the site was significant enough to warrant designation and it would form an extension of existing Open Land provided by the Grand Union Canal, and provide a buffer between nearby employment and residential areas. This was also supported by Berkhamsted Town Council⁸. Therefore, the Appraisal recommended that the site be progressed to the next stage.

- 7.25 The Open Space Study (2008) identified a deficit of open space within Berkhamsted and stated that the opportunity could be taken to include part of the Edgeworth House site nearest the canal as Open Land (sections 6.3 and 10.2).
- 7.26 However, it is considered that the entirety of land within the curtilage of Edgeworth House contributes to the settlement's urban form as one of the few remaining open green spaces within Berkhamsted and Northchurch. The proposed site is also considered to enhance the existing Open Land designation attributed to the green corridor along the Grand Union Canal; and enhances the character of the Listed Building and its setting. Therefore, proposed designation OL/5 set out in the Pre-submission Site Allocations DPD should be progressed to the next stage without amendment.
- 7.27 The Council recognises an error existed in Appendix 4 of the previous iteration of this Background Issues paper (September 2014) and has sought to rectify this along with further clarification provided above.

Conclusion

- 7.28 Appendix 4 summarises the assessments and reasoning for the extension or designation of the abovementioned new sites. Appendix 5 then includes the maps for the proposed changes and new sites. All other existing Open Land sites are proposed to be carried forward from the current Proposals Map.

⁸ Paragraph 2.35 of the Supplementary Site Allocations Consultation Report – Issues and Options Paper (November 2008) (Volume 2).

8. Responses Received to the Pre-Submission Site Allocations

- 8.1 A total of sixteen representations were received in response to Chapter 15 of the document, (relating to social, community, leisure and cultural facilities). Whilst the majority raised objections, these predominantly related to errors, omissions or identified the need for further clarification within the document and associated map book.

Social and Community Facilities

- 8.2 Hertfordshire County Council raised objection to a mapping error relating to the proposed education zone in north west Berkhamsted (EZ/3), which was also noted by the CPRE and some local residents. The proposed education zone should encompass the Bridgewater School site as well as the reserve site, which includes land to the northwest of the school and Bridleway, to accord with the area previously identified within the Core Strategy (Berkhamsted Place Strategy). This mapping error has been rectified and identified as a minor change through the Focused Changes.
- 8.3 The Environment Agency raised objection to proposed allocation of Education Zone EZ/1 in Nash Mills as this area was not included within the Council's Level 2 Strategic Flood Risk Assessment (2008). Parts of the site fall within Flood Zone 2 where 'more vulnerable' development, including educational establishments, are generally considered appropriate. Nevertheless, any planning application for development of any site within this allocated zone will be subject to a site-specific Flood Risk Assessment. Whilst it is considered that no change is required as this constraint does not preclude development entirely, this issue has since been discussed further with Hertfordshire County Council as Local Education Authority and the need to conduct further assessments of the site has been identified as a result.
- 8.4 The landowners of the existing Amaravati Buddhist Monastery in Great Gaddesden also raised objection to the proposed allocation of the site to enable redevelopment and improvement of this community facility. Their concerns related to flexibility of the proposal however this had already been highlighted to the Council. As such, the Council had engaged in discussions with them and their agents just prior to opening the consultation on the Site Allocations DPD. Consequently the principle of amending the proposal wording and defined area within the map book had been agreed and suggested minor changes proposed which changes the extent of the developable part of the site and provides some additional clarification to the planning requirements for the proposal.
- 8.5 Representations received from Natural England in respect of Chapter 7, as well as Local Allocation LA5 (see above), indicate support for the allocation of land for a cemetery extension and public open space both at the LA5 site (C/1 and L/3, respectively) and identification of land for the redevelopment of Amaravati Buddhist Monastery in Great Gaddesden (C/2). However, it was requested that the planning requirements set out in Proposals C/1, C/2 and L/3 be strengthened to incorporate the need for developers to consult the Chilterns Conservation Board to ensure the impact of the development on the Chilterns AONB is given

appropriate consideration at the planning application stage. These are reflected as minor changes to the Site Allocations DPD, through the Focused Changes process.

Leisure and Cultural Facilities

- 8.6 Another key omission identified through representations received from Hertfordshire County Council, is the need to allocate land for detached playing fields in Tring. This was identified as a local objective within the Tring Place Strategy as part of the adopted Core Strategy but subsequently missed out of the Site Allocations DPD. In the event that they are required following expansion of Tring School, land at Dunsley Farm off London Road will be allocated to provide additional playing fields. The identification of this land has been confirmed in consultation with Hertfordshire County Council, as Local Education Authority and landowner, and the consequential change to the Site Allocations DPD has been identified as a significant change through the Focused Changes.
- 8.7 Sport England and Tring Sports Forum have also raised objection to paragraphs 7.12 and 7.13 of the Pre-Submission Site Allocations document, which refer to conclusions of technical work completed by the Council in respect of the need for additional leisure facilities. The Council recognises that these paragraphs would benefit from further clarification and have recommended both minor and editorial changes. Such changes reflect the purpose and extent of the Outdoor Leisure Facilities Assessment Report completed in 2014 and role of the subsequent Playing Pitch Strategy and Action Plan which identifies priorities for the provision of future facilities for outdoor sports only. Since completion of the consultation on the Site Allocations DPD, this Playing Pitch Strategy and Action Plan has been completed and was published in June 2015.
- 8.8 A number of representations were also received in respect of Open Land proposals. Whilst Berkhamsted Town Council expressed their support for designating Edgeworth House in Berkhamsted, some local residents raised objection referring to the appropriateness of the land for residential development and identifying conflicting assessments of this site in terms of its justification for designation within the Background Issues Paper: Providing Homes and Community Services. Having reviewed the reasons behind proposals to newly designate this site as Open Land, a view has been taken that the site does satisfy the Council's strategy for designating Open Land. In particular it contributes to the special character of the Grade II* Listed Building and associated garden, is one of the few remaining green spaces within Berkhamsted and enhances the existing Open Land designation running parallel to the Grand Union Canal which is immediately adjacent to the site. Therefore the Council are not proposing any changes to this proposed designation but recognises the need to provide further clarification within the relevant Background Issues Paper.
- 8.9 Objections were also raised by local residents regarding the retention of designated Open Land at St Mary's Convent in Boxmoor, Hemel Hempstead and Woodhall Lane, Adayfield. It was suggested that both of these sites would be suitable for residential development; however, this is the first instance

representations have been received questioning the ongoing value of retaining these particular sites as Open Land. Therefore the Council has had no cause to reassess these (or other) sites specifically. During previous open space studies these existing designations were rolled forward (on the presumption that they continued to form important green infrastructure within towns and villages) in addition to considering new sites or amended boundaries only. As such no changes are proposed to these existing designations through the Site Allocations DPD.

8.10 The changes proposed through the Focused Changes stage are as follows:

7. Meeting Community Needs		
Text: 7.1-7.3	E	Paragraph 7.2: Update footnote 21 as follows: Infrastructure Delivery Plan Update, January 2014 <u>June 2015</u> .
Table 5		No change
Text: 7.4-7.11	MC60	Paragraph 7.7: Amend text as follows: Most new school places <u>within the Borough</u> (both primary and secondary) can be accommodated through the expansion of existing schools (and the reopening of a former school at Jupiter Drive, Hemel Hempstead). <u>The forecast needs for school places in Tring can be met through expanding Tring Secondary School (including the provision of detached playing fields) and by expanding Dundale and Grove Road primary schools.</u>
	MC61	Paragraph 7.10: Amend text as follows: The need for additional school provision to serve future housing in north east Hemel Hempstead will be considered through the Area Action Plan. <u>Phase 2 of the Spencer's Park development will incorporate a new 2 form entry primary school to meet the needs of the local community.</u>
Policy SA10	SC9	Amend wording of Policy SA10 as follows: Policy SA10: Education Zones Education Zones are shown on the Policies Map for Nash Mills, Hemel Hempstead and Berkhamsted. In accordance with Policy CS23: Social Infrastructure, a flexible approach will be taken to support delivery of new primary schools <u>and provision of facilities ancillary to education uses</u> in these areas, provided: <ul style="list-style-type: none"> (a) There is clear evidence of local need; and (b) No suitable alternative sites are available.
Education	MC62	Correct the mapping error for EZ/3 North West Berkhamsted to

Zones on Policies Map		show the full extent of the site as per Figure 23 of the Core Strategy (see map below).								
Schedule of Social and Community Proposals and Sites	MC63	Amend Proposal C/1 as follows: <table><tr><td>Proposal C/1</td><td></td></tr><tr><td>Location:</td><td>Land West of Tring</td></tr><tr><td>Site Area (Ha):</td><td>1.6 Ha</td></tr><tr><td>Planning Requirements:</td><td>Provision of detached extension to Tring Cemetery. Access from Aylesbury Road. Site to be well landscaped (particularly along its boundaries), appropriate to its location within the Chilterns Area of Outstanding Natural Beauty – <u>design details to be discussed with the Chilterns Conservation Board to ensure the proposal does not have an adverse effect on the AONB and its setting. Undertake protected species surveys and incorporate appropriate requirements into any planning application to ensure there would be no adverse impacts. To also include appropriate parking area (of at least 30 spaces) and ancillary building and yard within the adjacent development area (i.e. land excluded from the Green Belt) to meet service needs.</u></td></tr></table>	Proposal C/1		Location:	Land West of Tring	Site Area (Ha):	1.6 Ha	Planning Requirements:	Provision of detached extension to Tring Cemetery. Access from Aylesbury Road. Site to be well landscaped (particularly along its boundaries), appropriate to its location within the Chilterns Area of Outstanding Natural Beauty – <u>design details to be discussed with the Chilterns Conservation Board to ensure the proposal does not have an adverse effect on the AONB and its setting. Undertake protected species surveys and incorporate appropriate requirements into any planning application to ensure there would be no adverse impacts. To also include appropriate parking area (of at least 30 spaces) and ancillary building and yard within the adjacent development area (i.e. land excluded from the Green Belt) to meet service needs.</u>
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Location:	Land West of Tring									
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	MC64	Amend Proposal C/2 as follows: <table><tr><td>Proposal C/2</td><td></td></tr><tr><td>Location:</td><td>Amaravati Buddhist Monastery, St Margarets Lane, Great Gaddesden</td></tr><tr><td>Site Area (Ha):</td><td>3.0 Ha</td></tr><tr><td>Planning Requirements:</td><td>Phased approach to redevelopment of existing <u>previously developed part</u> of the site. The design, layout and scale of development to be guided by its sensitive location in the Chilterns Area of Outstanding Natural Beauty, open setting, and the ability of St Margarets Lane to serve the site. <u>Advice to be sought from the Chilterns Conservation Board at the design stage and including taking account of the Chilterns Building Design Guide and associated Technical Guidance Notes.</u> Existing landscaping to be retained and, where</td></tr></table>	Proposal C/2		Location:	Amaravati Buddhist Monastery, St Margarets Lane, Great Gaddesden	Site Area (Ha):	3.0 Ha	Planning Requirements:	Phased approach to redevelopment of existing <u>previously developed part</u> of the site. The design, layout and scale of development to be guided by its sensitive location in the Chilterns Area of Outstanding Natural Beauty, open setting, and the ability of St Margarets Lane to serve the site. <u>Advice to be sought from the Chilterns Conservation Board at the design stage and including taking account of the Chilterns Building Design Guide and associated Technical Guidance Notes.</u> Existing landscaping to be retained and, where
Proposal C/2										
Location:	Amaravati Buddhist Monastery, St Margarets Lane, Great Gaddesden									
Site Area (Ha):	3.0 Ha									
Planning Requirements:	Phased approach to redevelopment of existing <u>previously developed part</u> of the site. The design, layout and scale of development to be guided by its sensitive location in the Chilterns Area of Outstanding Natural Beauty, open setting, and the ability of St Margarets Lane to serve the site. <u>Advice to be sought from the Chilterns Conservation Board at the design stage and including taking account of the Chilterns Building Design Guide and associated Technical Guidance Notes.</u> Existing landscaping to be retained and, where									

			appropriate, enhanced. Replacement of some of the existing buildings within the <u>previously developed part</u> of the site is acceptable provided they are of a high quality of design. Significant intensification of current activities on the site <u>will not be</u> acceptable.
Policies Map	MC65	Amend Policies Map for Proposal C/1 to correct misaligned boundary	
	MC66	Amend Policies Map for Proposal C/2 to show amendment to site area	
Text: 7.12-7.16	MC67	<p>Paragraph 7.12: Amend text as follows to reflect publication of Playing Pitch Action Plan:</p> <p>The Borough contains a variety of leisure space and facilities which will be safeguarded. Technical work has been used to assess the condition and use of existing outdoor playing pitches within <u>Dacorum. The resulting Playing Pitch Strategy and Action Plan formulates sport-specific recommendations based on the assessed supply and demand for improvements to and/or new playing pitches required within the Borough. scale and nature of any future needs, both in terms of indoor facilities and outdoor pitches. This work does not highlight the need for any additional designations over and above those listed in the Schedule of Leisure Proposals and Sites and provided by the larger Local Allocations and the Strategic Site at Berkhamsted (see Table 5).</u></p>	
	E	<p>Paragraph 7.13: Amend text as follows:</p> <p>7.13 There is flexibility in policies to allow for new pitches to come forward within open spaces and the Green Belt should future needs arise and resources allow. The <u>Action Plan which supplements the Outdoor Leisure Facilities Study will be followed up by an Action Plan which can also explore</u> how more effective use can be made of existing provision.</p>	
Schedule of Leisure Proposals and Sites	MC68	Amend Planning Requirements for Proposal L3/ as follows:	
		Proposal L/3	
		Location:	Land to the West of Local Allocation LA5: Icknield Way, Tring
		Site Area (Ha):	6.5 Ha

		Planning Requirements:	Proposal linked to bringing forward public open space as part of Local Allocation LA5. Provide an east-west footpath/cycleway from the development area to the A41 roundabout. Provide a mix of parkland and informal open space appropriate to its location within the Chilterns Area of Outstanding Natural Beauty (AONB) and consider inclusion of pitches for outdoor sports. Retain and enhance existing hedgerows and tree belts and provide new native tree planting and wildlife habitats. Provide a neighbourhood equipped play area. <u>Design details to be discussed with the Chilterns Conservation Board to ensure the proposal does not have an adverse effect on the AONB and its setting.</u> See site master plan.
	SC10	Add new Proposal L/4 under Tring	
		Proposal L/4	
		Location:	<u>Dunsley Farm, London Road, Tring</u>
		Site Area (Ha):	<u>2.7 Ha</u>
		Planning Requirements:	<u>Proposal linked to the potential future redevelopment of Tring Secondary School to make provisions for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England standards. These playing pitches will be also be made available for community use.</u>
Policies Map	SC11	Amend Policies Map for Proposal L/3 to show amendment to site area	
	SC12	Add map for new Proposal L/4 to Policies Map	

Notes:

- A new Major Developed Site (MDS/1) at Abbots Hill School has also been added through the Focused Changes, together with clarification of the proposed infill area for Kings Langley School MDS. See the Sustainable Development background issues Paper for further information.
- For the revised maps please refer to the Report of Representations (July 2015).

9. Responses Received to the Focused Changes

- 9.1 Five objections were received to Focused Change SC12 which, together with SC10 introduces a new Leisure proposal for detached playing fields at Dunsley Farm to serve any future expansion of Tring secondary school. The need for this provision is referenced within the adopted Core Strategy and this proposal was included as part of the Focused Changes consultation to remedy the omission of a specific plan designation. Hertfordshire County Council's Ecology Officer raised concerns regarding the impact of potential floodlighting and the need to protect existing hedgerows. Whilst Tring Sports Forum objected to the proposal, their comments make it clear that they support the principle of the allocation, but object to the fact that there is no explicit reference to the pitches being available for wider community use (which is incorrect) and state that the plan still does not include sufficient sports provision for the town.
- 9.2 As a result of these representations, some further minor changes are proposed to the L/4 proposals. These are set out in the Report of Representations - Addendum (December 2015) and are as follows:

Proposal L/4	<p>Amend the text of Proposal L/4 (Focused Change SC10) as follows:</p> <table border="1" data-bbox="392 1131 1428 1868"> <thead> <tr> <th colspan="2" data-bbox="400 1137 667 1167">Proposal L/4</th></tr> </thead> <tbody> <tr> <td data-bbox="400 1171 667 1200">Location</td><td data-bbox="667 1171 1420 1200">Dunsley Farm, London Road, Tring</td></tr> <tr> <td data-bbox="400 1205 667 1234">Site Area (Ha):</td><td data-bbox="667 1205 1420 1234">2.7</td></tr> <tr> <td data-bbox="400 1238 667 1267">Planning Requirements:</td><td data-bbox="667 1238 1420 1861"> <p>Proposal linked to the potential future redevelopment of Tring School to make provisions for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England standards guidance. These playing pitches will be also be made available for community use.</p> <p><u>Existing hedgerows to be retained and enhanced where possible to minimise any impact upon the ecological value of the site, including existing wildlife corridors. Pedestrian access to the site to be via adjacent cricket pitch. Consideration to be given to the provision of a pedestrian crossing point on Station Road to ensure safety of movement between the site and school.</u></p> </td></tr> </tbody> </table>	Proposal L/4		Location	Dunsley Farm, London Road, Tring	Site Area (Ha):	2.7	Planning Requirements:	<p>Proposal linked to the potential future redevelopment of Tring School to make provisions for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England standards guidance. These playing pitches will be also be made available for community use.</p> <p><u>Existing hedgerows to be retained and enhanced where possible to minimise any impact upon the ecological value of the site, including existing wildlife corridors. Pedestrian access to the site to be via adjacent cricket pitch. Consideration to be given to the provision of a pedestrian crossing point on Station Road to ensure safety of movement between the site and school.</u></p>
Proposal L/4									
Location	Dunsley Farm, London Road, Tring								
Site Area (Ha):	2.7								
Planning Requirements:	<p>Proposal linked to the potential future redevelopment of Tring School to make provisions for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England standards guidance. These playing pitches will be also be made available for community use.</p> <p><u>Existing hedgerows to be retained and enhanced where possible to minimise any impact upon the ecological value of the site, including existing wildlife corridors. Pedestrian access to the site to be via adjacent cricket pitch. Consideration to be given to the provision of a pedestrian crossing point on Station Road to ensure safety of movement between the site and school.</u></p>								

Appendices:

Providing Community Services

Appendix 1: Designations Identified Through the Development Plan

Schedule of Social and Community Facilities Proposal Sites – (Local Plan 2004)

Local Plan 2003 Ref No.	Site Address	Status	Action
C1	Land at Durrant's Lane / Shootersway, Berkhamsted	This site forms part of the Strategic Site SS1.	Update allocation and carry forward.
C2	Cambrian Way, Hemel Hempstead	Development has taken place.	Delete as a proposal
C3	Astley Cooper School, St Agnells Lane, Hemel Hempstead	Continuing as educational use.	Delete as a proposal
C4	Highfield House, Jupiter Drive / Queensway, Hemel Hempstead	The site has been brought for residential use.	Delete as a proposal
C5	West Herts Hospital, Hemel Hempstead	Ongoing discussions with the NHS for the redevelopment of the Hospital Site for a mixed use scheme. A new hospital, housing and a school will be delivered through the redevelopment of the site.	Update allocation and carry forward.
C6	Woodwells Cemetery, Hemel Hempstead	This site will be continued to be safeguarded for a cemetery use to serve Hemel Hempstead. The boundary of the site would be considered through the East Hemel Area Action Plan.	Update allocation and carry forward.
TWA 20	Land Between Featherbed Lane and Two Waters Way	This site is no longer being considered as housing is currently being delivered on the site.	Delete as a proposal

Schedule of Leisure and Tourism Proposal Sites (Local Plan 2004)

Local Plan 2003 Ref No.	Site Address	Status	Action
L1	Shootersway, Berkhamsted	This site falls under the Strategic Sites SS1.	To be allocated through Site Allocations
L2	Bunkers Lane, Hemel Hempstead	There is potential for this site to be taken forward for a mixed use development of commercial and leisure uses. The relocation of Leverstock Green Tennis Club would be linked to development on this site.	To be allocated through Site Allocations
L3	Dundale, Tring	Open land had been developed which provided an opportunity for funding for the management and maintenance of the remaining area of open land on the overall site.	Superseded allocations, do not allocate through Site Allocations
L4	Miswell Lane, Tring	This site is currently in use as open and should be retained as there is potential for the site to be developed in the future for leisure purposes.	Do not allocate
L5	Grand Union Canal, Dry Section, Wendover Arm, Tring	Works are taking place on a restoration project at this site. Other general plan policies will ensure continued protection of the canal environment.	Do not carry forward/allocate.
L6	Buncefield Lane, Hemel Hempstead	To be considered under the East Hemel Hempstead Area Action Plan or single Dacorum Local Plan.	Do not allocate
L7	Woodwells Farm, Buncefield Lane, Hemel Hempstead	To be considered under the East Hemel Hempstead Area Action Plan or single Dacorum Local Plan.	Do not allocate
L8	Paradise Fields, Hemel Hempstead	Work is taking place on the housing scheme. New informal leisure space will be considered as part of the overall development on the Hospital site.	Reallocate through Mixed Use proposal
L9	Land at North East Hemel Hempstead	Planning permission has been approved for housing development and associated community facilities and open	Do not allocate

		space at Spencer's Park, Three Cherry Trees Lane (Phase 1) (4/01477/09/MOA). Phase 2 of Spencer's Park has been identified within the Site Allocations DPD.	
L10	Hemel Hempstead Rugby Football Club, Pennine Way	Planning permission has been implemented under reference 4/00920/08/MFA. Consent was granted for a 495-seater stadium on the site with upgraded facilities.	Do not allocate
L11	Kings Langley School, Love Lane	Planning permission has been granted under reference number 4/00909/14/MFA for the redevelopment of the existing school buildings on this site.	See MDS allocation
TWA21	Land Adjoining Featherbed Lane and the A41, including the eastern part of Home Wood	A housing development has been implemented on this site that will deliver new leisure space and will support other environmental improvements.	Do not allocate
TWA22	Land Between Featherbed Lane, Two Waters Road and A41, including the western part of Home Wood	A housing development has been implemented on this site that will deliver new leisure space and will support other environmental improvements.	Do not allocate

Appendix 2: Social / Community Documents

1. Social and Community Facilities Study – January 2006 – Dacorum Borough Council

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/social-community-facilities>

2. Dacorum Sport and Recreation Study – March 2006 – Indoor Facilities – Knight Kavanagh & Page

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/sport-indoor-2006>

3. Dacorum Sport and Recreation Study – Outdoor Sports Facilities – October 2006 – Knight Kavanagh & Page

<http://www.dacorum.gov.uk/docs/default-source/planning-development/final-outdoor-sport-report-oct-06.pdf?sfvrsn=0>

4. Town Stadium Complex – At Hemel Hempstead Feasibility Study – June 2009 – PMP

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/town-stadium-feasibility-study-phase-i>

5. Dacorum Town Stadium Feasibility Study Phase 2 – June 2010 – PMP Generis

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/town-stadium-feasibility-study-phase-ii-2010>

6. Sports Facilities Audit 2011 – January 2012 – Dacorum Borough Council

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/sports-facilities-audit-2011>

7. Sports Policy Statement and Action Plan – April 2012 – Dacorum Borough Council

8.

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base/sports-policy-statement-action-plan-2012>

9. Outdoor Leisure Facilities Study Assessment Report – September 2014 – Knight Kavanagh & Page

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base>

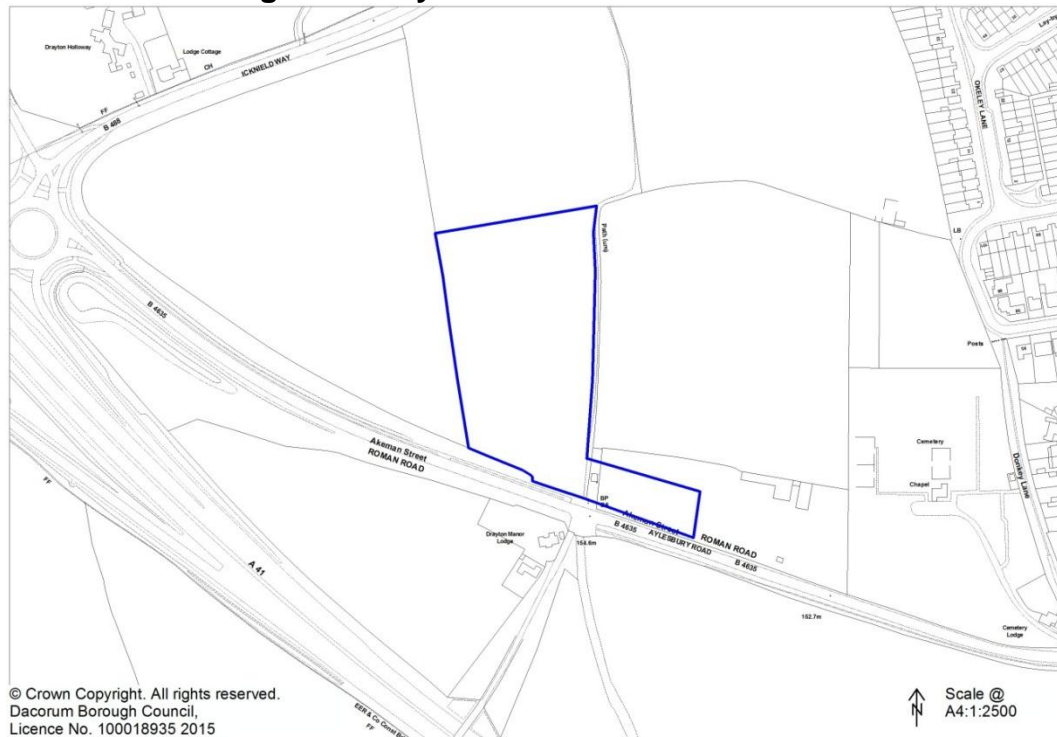
10. Dacorum Playing Pitch Strategy and Action Plan – June 2015 – Knight
Kavanagh & Page

<http://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/evidence-base>

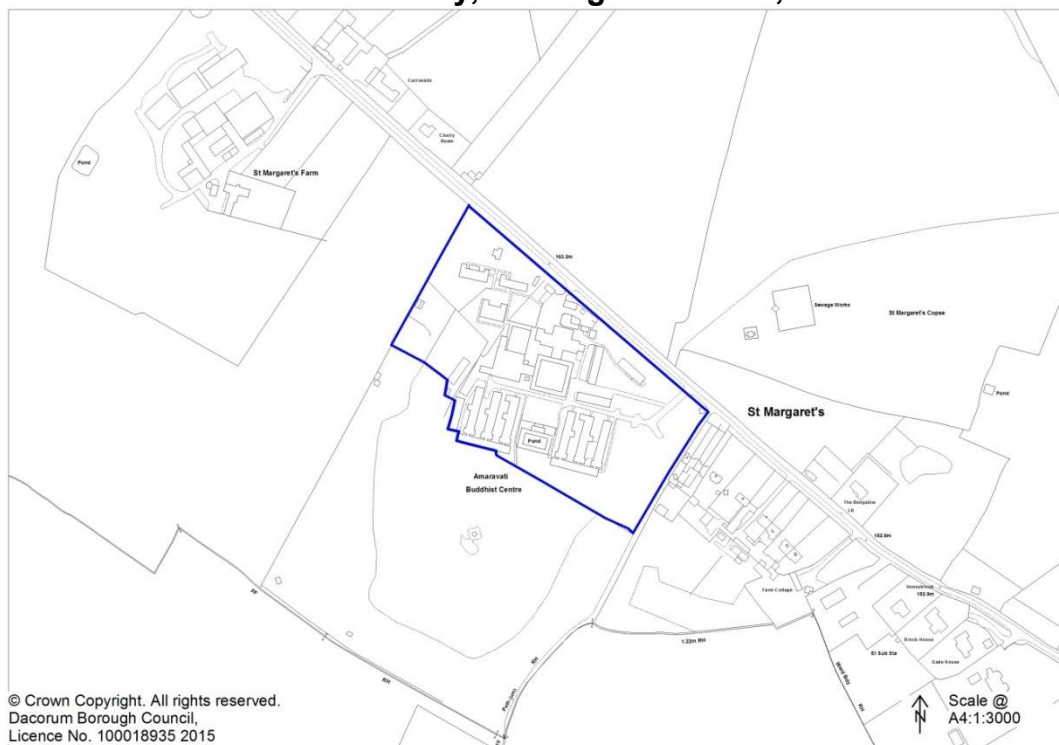
Appendix 3: Maps of Sites to be Allocated

Note: These maps shows the designations as at the Pre-Submission stage. There have been some minor changes to boundaries to some sites through the Focused changes process, plus the addition of a new Leisure Designation (L/4)

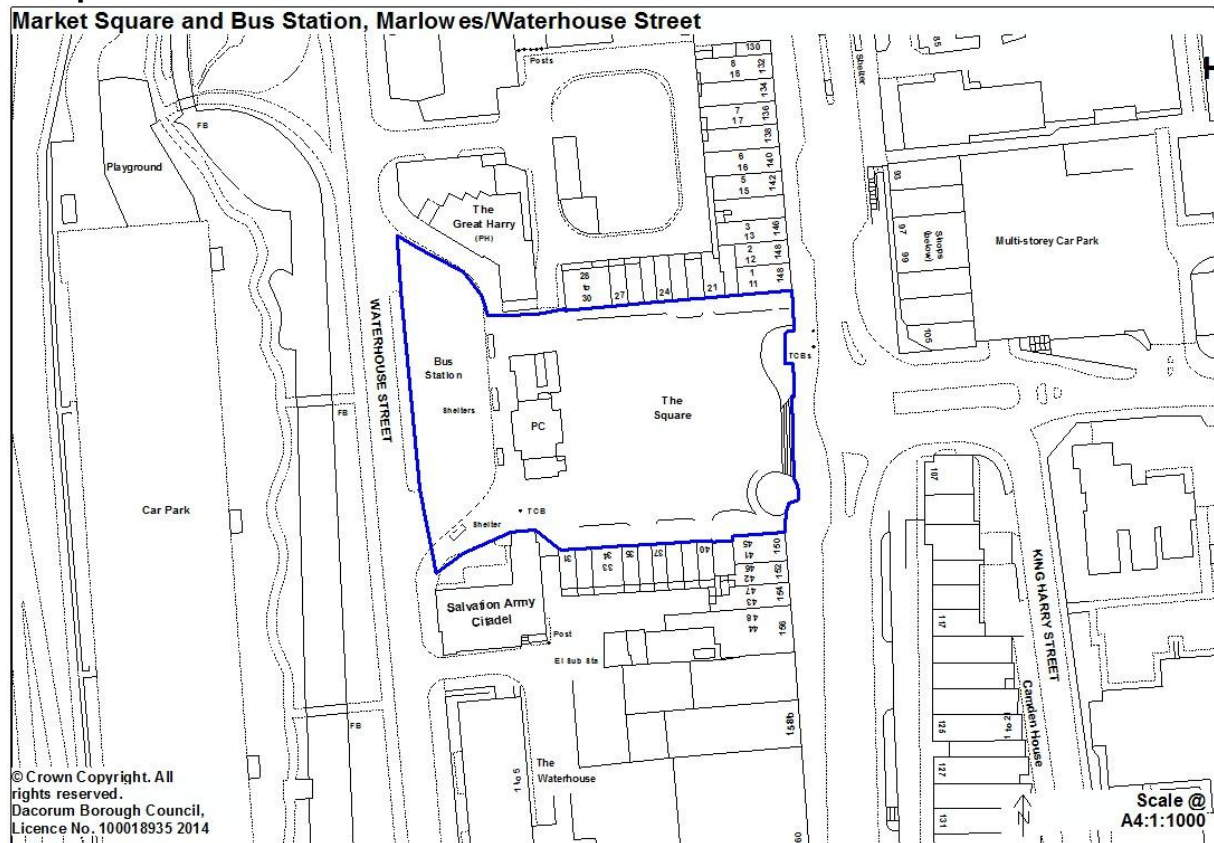
C/1 Extension to Tring Cemetery



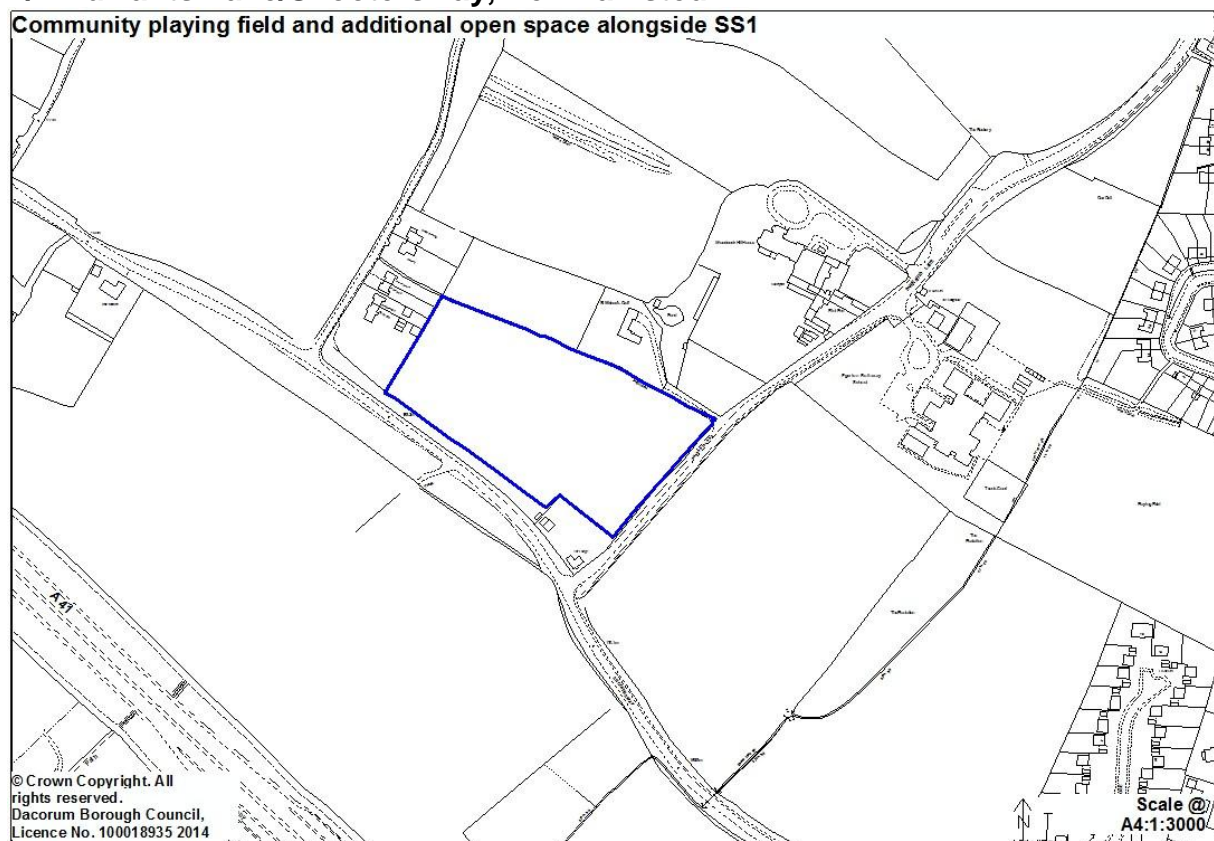
C/2 Amaravati Buddhist Monastery, St Margaret's Lane, Great Gaddesden



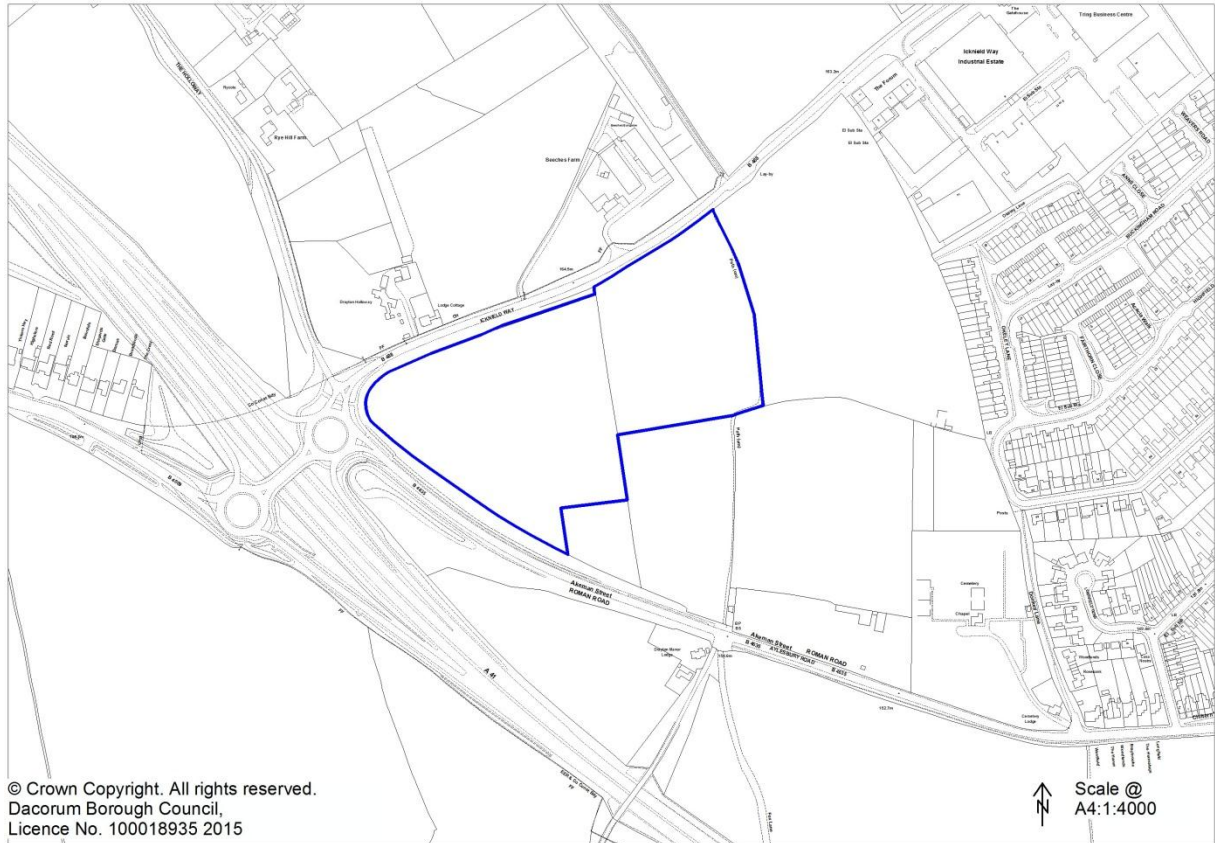
L/1 Market Square and Bus Station, Marlowes/Waterhouse Street, Hemel Hempstead



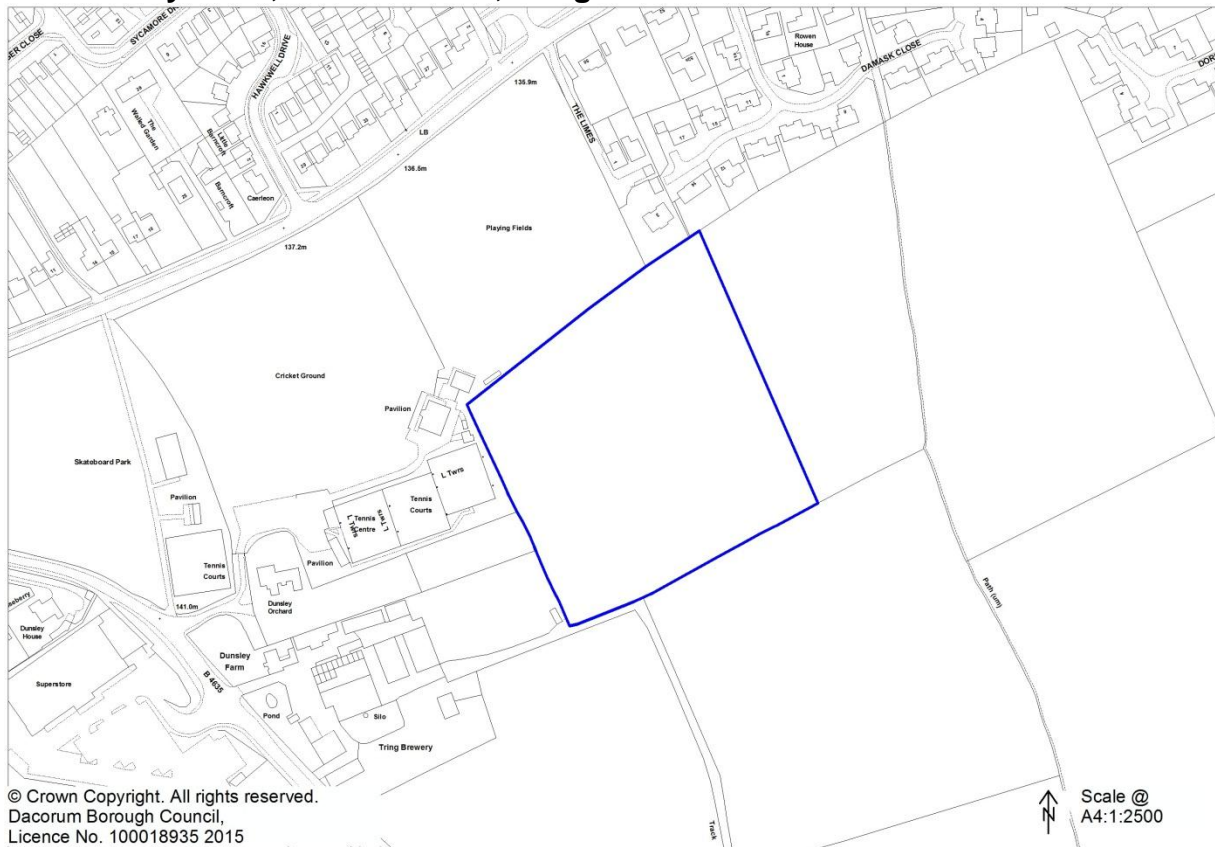
L/2 Durrants Lane/Shootersway, Berkhamsted



L/3 Leisure Space at LA5, Icknield Way, west of Tring



L/4 Dunsley Farm, London Road, Tring



Appendix 4: Open Land Site Matrix

Reference	Site	Town	Existing Use	Proposed Use	Built form	Constraints / Designations	Character	Comments	Recommendation
Be/o5 & OL/5	Edgeworth House, High Street	Berkhamsted	Back garden	Open Land	Dwelling and outbuildings	Watercourse and Floodplain	Residential	The green space here forms the back garden of the dwelling and extends 1.6Ha. Site affected by watercourse and floodplains, but land contributes to urban form, would extend the existing green corridor/Open Land associated with the canal and enhances the character of the Listed Building.	Designate Open Land
	Woodland at Hilltop Road	Berkhamsted	Woodland	Open Land	None		Woodland	Area of woodland screening residential area from MDS at Ashlyns School. Not protected by TPO or other designation but arguably an important buffer of woodland between different character areas. Not considered to be of sufficient size to warrant designation.	No change
Be/o2	Land adjoining Bridle Way	Berkhamsted	Green link	Open Land	None	TPO; Green Belt	Significant trees	Provides a link between the town and adjoining countryside and a clear definition/landscaped buffer between the urban area and Green Belt.	No change
	Woodland at The Spinney	Berkhamsted	Woodland	Open Land	None	TPO	Woodland	Inclusion of the woodland into the town is logical and contributes a buffer between the urban area and the Green Belt. The trees are protected and form part of the setting of the road. Not considered to be of sufficient size to warrant designation.	No change
	Castle Gate Way to the rear of Gaveston Road	Berkhamsted	Woodland	Open Land	None	TPO; Green Belt	Significant trees	The small part of woodland is an addition to the main part to the west. All the trees are protected by a TPO and the current Green Belt boundary is logical. Therefore the openness of the site is safeguarded by the Green Belt designation.	No change

Reference	Site	Town	Existing Use	Proposed Use	Built form	Constraints / Designations	Character	Comments	Recommendation
Bov/c2	Land rear of Green Lane and Austin Mead	Bovingdon	Open Land	Housing, health centres, residential care home and open space	None	Green Belt	Significant trees	Site within the Green Belt and no public access. Not appropriate for designating Open Land.	No change
H/I3 & MU/5	Bunkers Farm	Hemel Hempstead	Agriculture / public open space	To provide cemetery and compensate for loss of leisure space from elsewhere	None	Green Belt	Countryside	Proposal site L2 within the Local Plan and now included as proposal MU/5 within the Site Allocations DPD for new leisure space and a cemetery. Not appropriate to designate as Open Land as protected by Green Belt.	No change
H/h70	Field between Westwick Farm and Green Lane	Hemel Hempstead	Open Land	Residential	None	Green Belt	Countryside	Site protected by virtue of the Green Belt and in use for agricultural purposes meaning that the site is not appropriate for Open Land designation.	No change
H/I2	Land immediately north of Westwick Farm	Hemel Hempstead	Open Land	Residential or open space / sports provision	None	Green Belt	Countryside	Site protected by virtue of the Green Belt and in use for agricultural purposes meaning that the site is not appropriate for Open Land designation.	No change
H/h74	Land between Westwick Farm and Green Lane	Hemel Hempstead	Open Land / Agriculture	Housing	None	Green Belt	Countryside	Site protected by virtue of the Green Belt and in use for agricultural purposes meaning that the site is not appropriate for Open Land designation.	No change
	Landscaping permeating the western edge of Gadebridge Park	Hemel Hempstead	Landscaping	Open Land	None		Significant trees	Site protected by virtue of the Green Belt and contains significant trees meaning that the site is not appropriate for Open Land designation.	No change

Reference	Site	Town	Existing Use	Proposed Use	Built form	Constraints / Designations	Character	Comments	Recommendation
	Land adjacent to Howe Grove	Hemel Hempstead	Amenity land / paddocks	Open Land	None	Green Belt	Grassland / countryside	Site protected by virtue of the Green Belt meaning that the site is not appropriate for Open Land designation	No change
	Woodland permeating northern edge of Woodhall Farm; High Wood	Hemel Hempstead	Woodland	Open Land	None	Green Belt	Woodland	Site protected by virtue of the Green Belt and contains significant trees meaning that the site is not appropriate for Open Land designation	No change
	Land at junction with Link Road and Redbourn Road	Hemel Hempstead	Small housing development on corner of Open Land	Remove from Open Land	Dwellings	Green Belt	Housing	Recent development which was argued on viability grounds to protect the Heritage Asset at the site. The curtilage of the small housing development does not benefit from a clear logical boundary. Should it be removed additional development would likely have a negative impact on the Open Land	No change
	Land at Two Waters Road	Hemel Hempstead	Back gardens	Remove from Open Land	Scattered development and some built form	Watercourse and Floodplain	Open / greenfield	The Open Land designation at Two Waters Road is extensive and covers a number of buildings and types of use. The current boundaries are logical and well defined and therefore little need to alter the existing Open Land designation.	No change
H/o1 & OL/2	Hunting Gate Wood	Hemel Hempstead	Green link	Open Land	None	TPO	Woodland	Area of woodland attached to Margaret Lloyd Park (0.9ha), valuable green space consistent with the aims of protecting open and green space, and provides public access between Margaret Lloyd Park and Aycliffe Drive.	Extend Open Land
H/o8 & OL/1	Hobblets School	Hemel Hempstead	school grounds	Open Land	School buildings		Playing field	Substantial school grounds (3.24 ha) containing playing fields and significant green space in the urban area. Consistent with the designations of other school sites in the town.	Designate Open Land

Reference	Site	Town	Existing Use	Proposed Use	Built form	Constraints / Designations	Character	Comments	Recommendation
H/o10 & OL/3	Woodland belt Maylands Avenue	Hemel Hempstead	Woodland	Open Land	None		Trees, green corridor	Green footways and barrier (2.1ha) between residential and employment areas, no other protection afforded to this important boundary and green infrastructure.	Designate Open Land
H/o12 & OL/4	Berkley Square / Cuffley Court / Bayford Close	Hemel Hempstead	Amenity land	Open Land	Block of flats		Garden area	Site used for communal rear gardens of block of flats. Rear of site benefits from a logical and defensible landscaped boundary (Holtsmere End Lane). The site makes a significant contribution to the greening and nature conservation of this otherwise urban residential area and is accessible to a number of residents.	Designate Open Land
	Leverstock Green Tennis Club	Hemel Hempstead	Tennis club and associated open space	Housing	Ancillary tennis club facilities		Sports use adjacent to residential and open land	The Tennis Club have expressed an interest in relocating to an alternative site which is situated within the Green Belt. . Some open sports uses are appropriate development in the Green Belt, but only small scale ancillary buildings are permitted. Should the Tennis Club successfully relocate the land here is allocated to be redeveloped for housing (proposal H/7 in the Site Allocations DPD). Therefore, the Open Land designation should be retained and not be removed unless the tennis club successfully relocate.	No change.
	Field adjacent to Barnes Lane with Hempstead Road and Coniston Road	Kings Langley	Agriculture	Open Land	None	Green Belt	Open / greenfield	Land in agricultural use, no public access or rights of way and area too small to be considered for Open Land. Protection of openness provided by Green Belt designation.	No change

Reference	Site	Town	Existing Use	Proposed Use	Built form	Constraints / Designations	Character	Comments	Recommendation
M/h8	Land rear of Pickford Road, Cleveland Road, Sursham Court and Farrer Top	Markyate	Open space	Housing	None	Open Land	Open / greenfield	Inclusion of play and sports provision and setting of the village. No loss of Open Land is advocated.	No change
	Woodland screening Woodland Close	Tring	Woodland	Open Land	None	Green Belt	Woodland	Area of woodland screening residential area. Not protected by TPO but partly within the Green Belt. However, site is not considered to be of sufficient size to warrant designation as Open Land.	No change

Appendix 5: Maps of Proposed Open Land Sites

Hobletts Manor School, Hemel Hempstead (OL/1)

Proposals Map 2004



Aerial Map



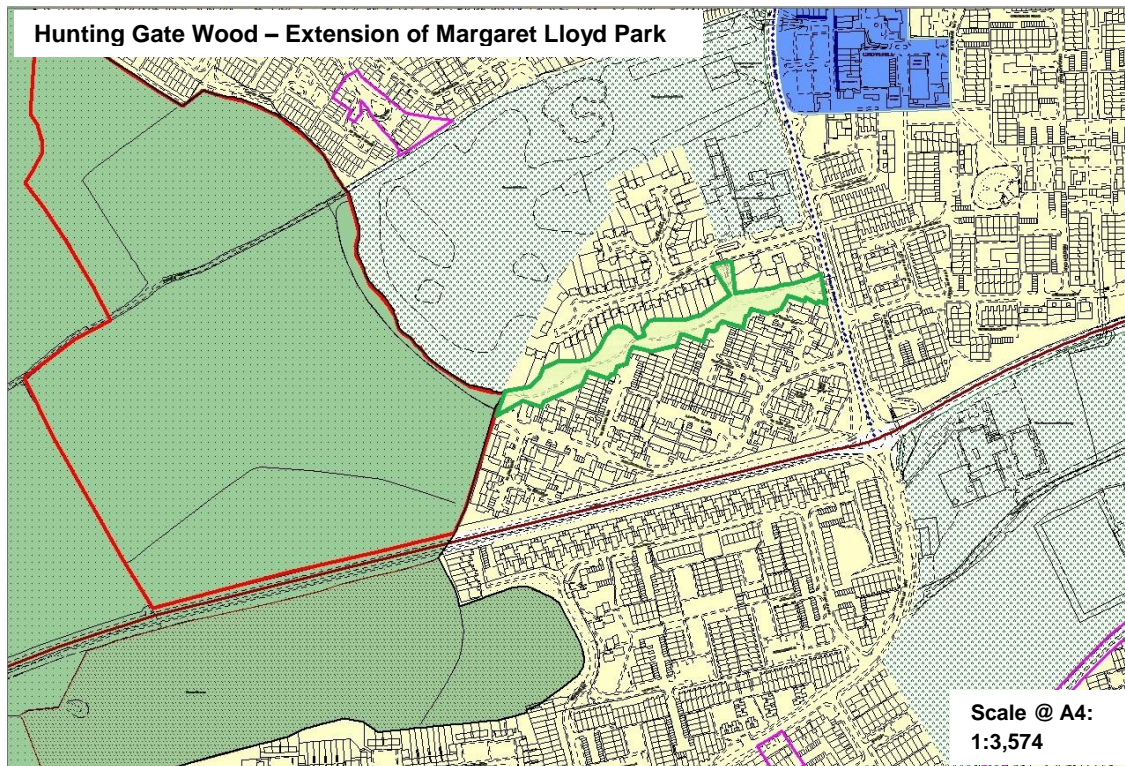
Proposed Designation

Hobletts School



Hunting Gate Wood – Extension of Margaret Lloyd Park, Grovehill, Hemel Hempstead (OL/2)

Proposals Map 2004



Aerial Map



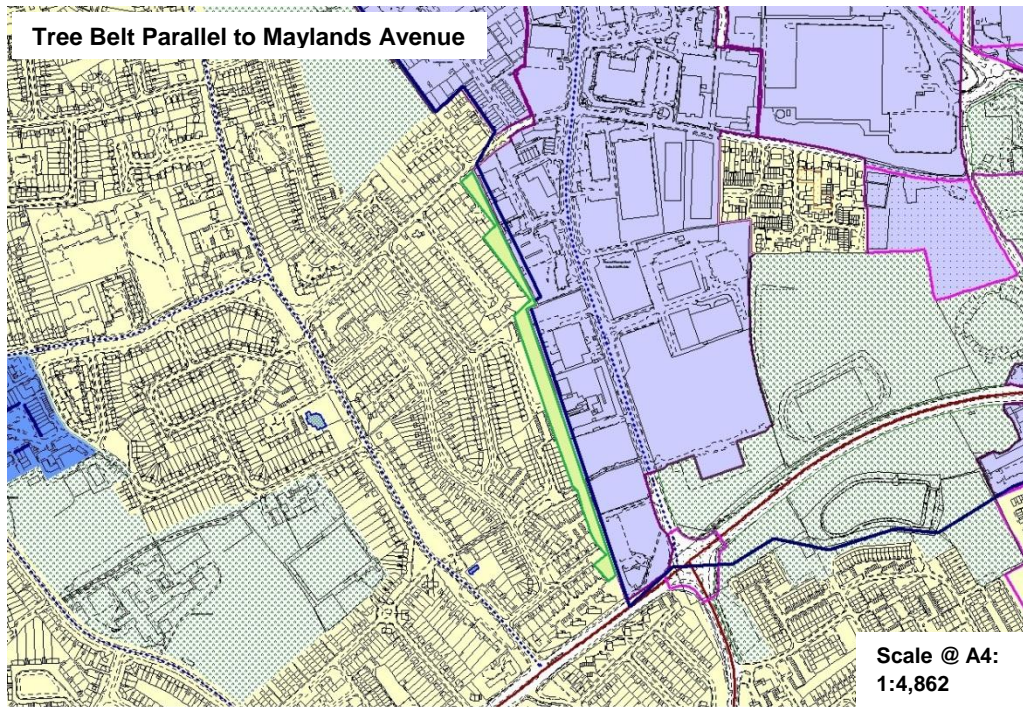
Hunting Gate Wood - Extension of Margaret Lloyd Park



Scale @
A4:1:2000

Tree Belt parallel to Maylands Avenue between Wood Lane End and Maddox Road (OL/3)

Proposals Map 2004



Aerial Map



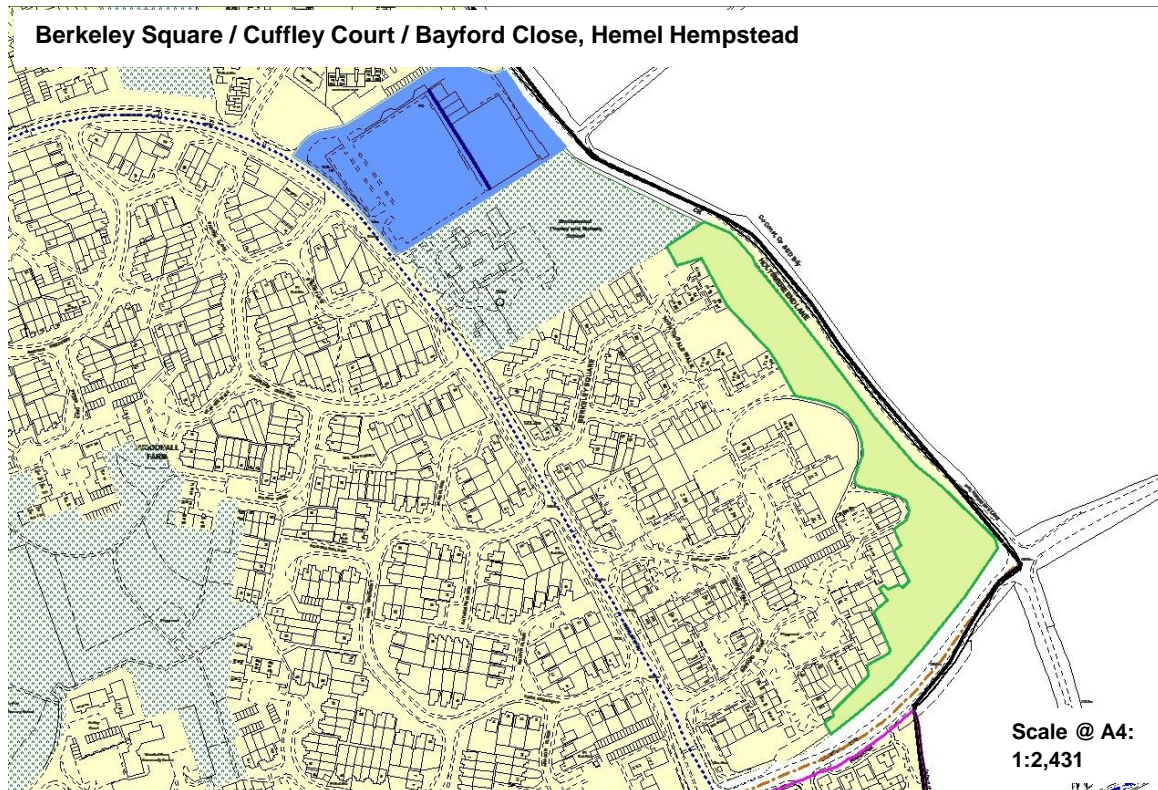
Proposed Designation

Tree Belt parallel to Maylands Avenue



Berkley Square/Cuffley Court/Bayford Close, Woodhall, Hemel Hempstead (OL/4)

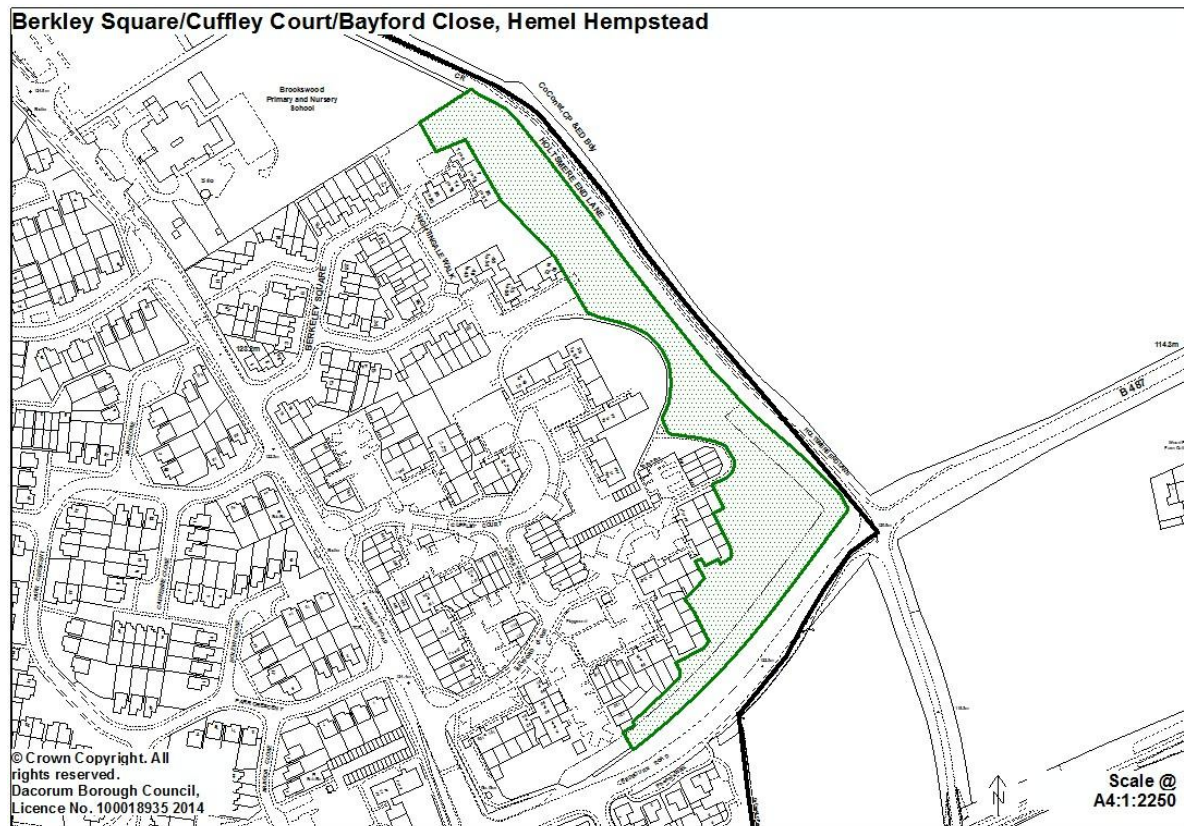
Proposal Map 2004



Aerial

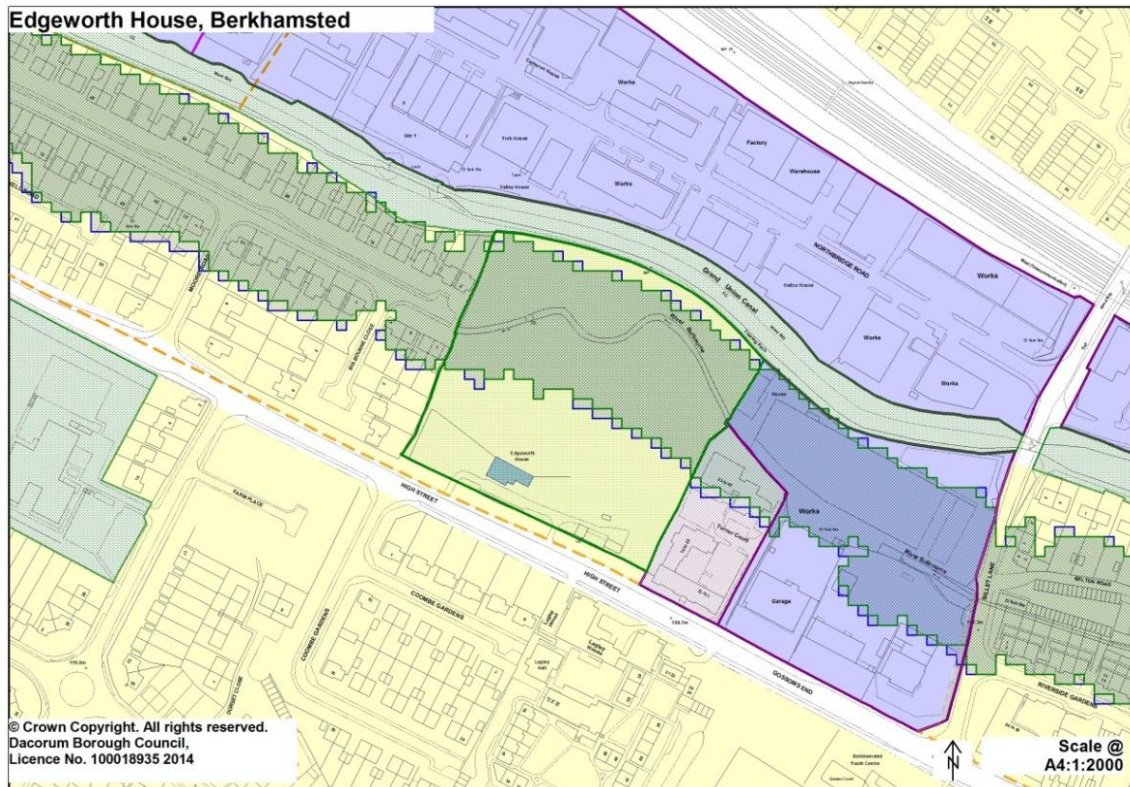


Proposed Designation



Edgeworth House, Berkhamsted (OL/5)

Proposals Map 2004



Aerial Map



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Scale @
A4:1:2000