

**DACORUM BOROUGH COUNCIL
DACORUM SITE ALLOCATIONS DEVELOPMENT PLAN
DOCUMENT EXAMINATION**

Document PC3c

10 May 2016

Introduction

The following statement sets out Dacorum Borough Council's (DBC) response to the questions raised by the Inspector in her letter of 18 April 2016. These relate to the comprehensiveness of the viability testing of the Local Allocations and to the process of sustainability appraisal – particularly with regard to the audit trail and assessment of reasonable alternatives regarding Gypsy and Traveller sites. These two issues are dealt with in turn below.

The Council wishes to thank the Inspector for allowing further time than initially suggested to respond to the issues raised.

As suggested by the Inspector, the Council has taken specialist legal advice on these matters from its external adviser, Rob Jameson, of Attwaters Jameson Hill. This advice has been given through a series of face-to-face meetings and email correspondence, rather than through the more formal medium of written advice.

Viability Testing

(a) Site Viability

It has been clarified by the Inspector that the outstanding concerns about the viability testing undertaken to support the plan, centres on the testing of the viability of the Local Allocations. Specifically, the Strategic Sites Testing (October 2013) (Examination Document ID4) undertaken to support the CIL examination did not test the policy requirement for three of the Local Allocation sites to include provision of a Gypsy and Traveller site.

Reference is made by the Inspector to representations from Barton Willmore (on behalf of Cala Homes) in relation to site LA5. These representations question the viability of delivering the scheme with the requirement for a Gypsy and Traveller site. The viability of this site is of particular importance due to its role in both the Council's 5 year supply of deliverable housing land and in meeting the Council's identified traveller pitch requirements.

The representations made by Barton Willmore highlight two concerns in relation to the impact on site viability of the requirement to provide a Gypsy and Traveller site as part of the overall development of LA5. Firstly, it asserts that the cost of providing this site will impact scheme viability, and secondly it raises concerns about '*commercial impacts*', and in particular the '*likely significant impact...on the value of market housing*'.

The Council agree that the cost of providing a Gypsy and Traveller site should be factored in as a planning requirement to the viability assessment for the delivery of

the site. Whilst concerns have only been raised about the viability of delivering site LA5, the Council feels it is also prudent to re-test the viability of the other two Local Allocation sites where a Gypsy and Traveller site is a policy requirement (i.e. LA1 Marchmont Farm and LA3 West Hemel Hempstead) to address this issue comprehensively in the evidence base.

The Council has therefore commissioned specialist consultants BNP Paribas Real Estate to undertake an update to the Strategic Sites Testing (October 2013) (Examination Document ID4) for sites LA1, LA3 and LA5. This work will include an update to the modelling inputs and planning requirements for each Local Allocation, and will include the requirement to provide a Gypsy and Traveller site. The draft brief for this work is attached as Appendix 1 to this response, and the Council would welcome confirmation from the Inspector that this will produce the evidence sought.

BNP Paribas Real Estate has advised that they can prepare the above work by the week commencing 20th June. Once received by the Council it will be passed immediately to the Inspector, via the Programme Officer, and added to the Examination Library (as Examination Document ID12).

(b) Sales Values

It is noted that Barton Willmore has also raised concerns with regards to the impact of the Gypsy and Traveller site on the sales values of market housing. The Council does not however consider that this is a valid or appropriate planning consideration and thus it will not be seeking any evidence relating to this particular issue. The Ethics and Professional Standards advice published by the Royal Town Planning Institute (RTPI) highlights that *'Only comments and representations made on material planning grounds should be taken into consideration when assessing a development proposal through the planning process. Representations brought on discriminatory grounds should be omitted from the decision making process.'*

The Council also has a duty, under the Public sector Equality Duty of the Equality Act 2010 to:

- Eliminate discrimination
- Advance equality of opportunity; and
- Foster good relations between different people when carrying out their activities.

The courts have ruled that Romany Gypsy and Irish Travellers are ethnic groups under the Equality Act 2010. The Council therefore considers that it would be failing in its duties outlined above if it were to consider the claim that the presence of a Gypsy and Traveller site may negatively impact sales values of market housing. This approach is supported by advice from the Council's external legal adviser and from the Planning Officers' Society (POS).

Sustainability Appraisal

The Inspector has raised two linked issues relating to the process of Sustainability Appraisal for the Site Allocations DPD. The first relates to whether the process is fit for purpose and includes a clear audit trail. The second relates to the issue of reasonable alternatives and whether these have been appropriately assessed. These issues are addressed in turn below.

(a) Clear Audit Trail

As explained in the Council's response to the previous questions on this matter (see Document PC3a), it is important to see the SA/SEA for the Site Allocations DPD as an iterative process, and one that is intrinsically linked with that of the adopted Core Strategy.

The various stages of the SA/SEA for the Site Allocations DPD itself were summarised in the 'Strategic Environmental Assessment Regulations Requirements Checklist,' attached as Appendix A to PC3a. The full process, including work related to the Core Strategy is set out in Figure 1 below.

In response to the Inspector's comments, the Council has asked its consultants, TRL Limited (previously known as C4S) to prepare an addendum to the original SA Report (Examination Document SUB20). This will pull together the information currently contained in other separate documents. For the reasons set out in section (b) below, this addendum will not include any new assessments, but will provide a clearer explanation of the process undertaken, the sites considered at each stage, the reasons why certain sites were discounted and the pivotal role the Core Strategy played in determining what were 'reasonable alternatives' at different stages in the plan-making process.

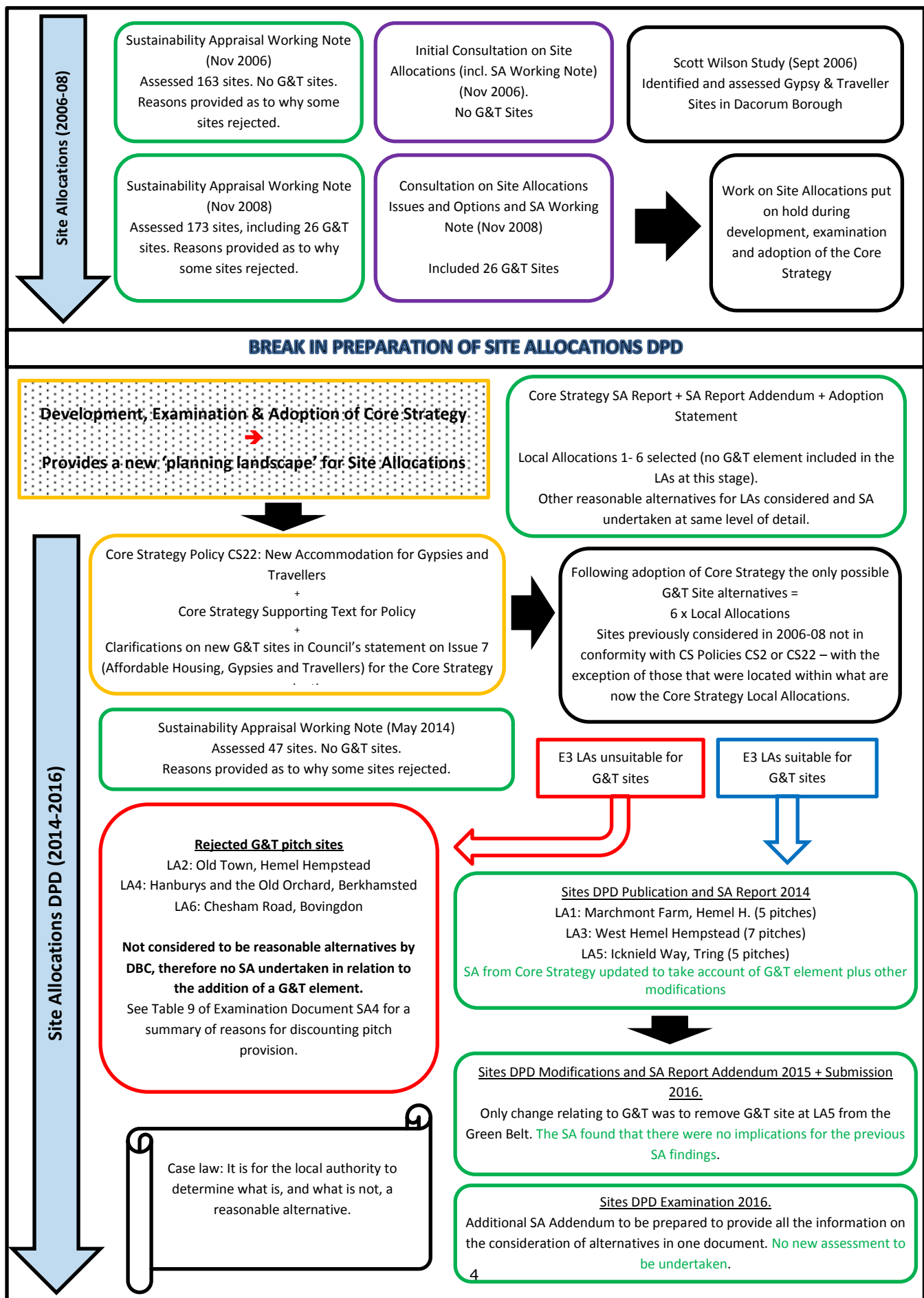
This addendum report is due to be received by the Council in the week commencing 16th May, and will be passed to the Inspector (via the Programme Officer), and added to the Examination Library (as Examination Document SA22) as soon as it is available.

(b) Assessment of Reasonable Alternatives

Paragraph 182 of the National Planning Policy Framework (NPPF) (Examination Document REG10) requires a Council's plan to be "*the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence.*" There is no reference in the NPPF, associated guidance or the SEA regulations to the need to consider 'unreasonable alternatives.' These comprise, by default, all of the alternatives that are not taken forward for the reasons given by the local planning authority.

In order to better understand how the Council has decided what comprise reasonable alternatives it is important to understand the evolution of the Site Allocations DPD, through the Issues and Options to the Pre-Submission stages.

Figure 1: Dacorum Site Allocations DPD – consideration of Gypsy and Traveller Sites



Issues and Options:

Work on this document initially began alongside the Core Strategy, with Issues and Options consultation held in 2006 and 2008 (Examination Documents SA18 and SA11). Both consultations were accompanied by SA Working Notes (Examination Document SA16 and SA14 respectively), which linked to the 2006 and 2008 Schedule of Site Appraisals (Examination Documents SA19 and SA13).

The 2008 consultation included detailed consideration of the recommendations of the 'Accommodation Needs of Gypsies and Travellers in South and West Hertfordshire, Stage Two: Identification of Potential Gypsy and Traveller Sites' prepared by consultants Scott Wilson (Examination Document HG15). This identified 24 sites within Dacorum for consideration. The consultation also included two additional sites suggested by members of the public.

All of these 26 sites were considered to be reasonable alternatives at this time, although one (D26) did not perform as well as the others in terms of meeting the sustainability objectives of the SA, due to the site being located in the flood zone. Whilst it could have been discounted from further consideration for this reason, it was included in the consultation for completeness.

Through this 2008 consultation a number of other locations were suggested as alternative Gypsy and Traveller sites. However, for the reasons set out in Table 5 in the Cabinet Report of March 2009 (Examination Document SA8), none were considered to comprise reasonable alternatives. The reasons for this conclusion is repeated in section 4 of the Providing Homes and Community Facilities Background Issues Paper that accompanies the Site Allocations DPD (Examination Documents SA4).

A further SA Working Note (May 2014) (Examination Document SA21) was prepared to assess a number of additional development sites that had been put forward for consideration (and included in the updated Schedule of Site Appraisals 2014). None of these new sites related to Gypsy and Traveller provision and so no new alternatives for sites to meet the needs of this particular group were assessed at this stage.

Pre-Submission (Publication):

In the time between the 2008 Issues and Options consultation and publication of the Pre-Submission Site Allocations DPD, the Core Strategy was progressed and adopted. The adoption of the Core Strategy is a critical moment in terms of the definition of reasonable alternatives for Gypsy and Traveller provision (and other types of land uses) in the context of the Site Allocations DPD. It created a clear and logical distinction between those sites considered to be reasonable alternatives *before* the adoption of the Core Strategy, and those *after*.

Key Core Strategy policies that had an impact in terms of reducing the pool of reasonable alternatives for Gypsy and Traveller sites are set out in Table 1. These policies were tested through examination and found 'sound.'

Table 1

Key Core Strategy Policies for the Consideration of 'Reasonable Alternatives' for Gypsy and Traveller Provision

Policy	Implications
CS2: Selection of Development Sites	Sets out a clear sequence and priority for the location of development sites, with land within defined settlements the first priority, followed by extensions to defined settlements (i.e. the Local Allocations).
CS5: Green Belt	Refers to the application of national Green Belt policy and the fact that there will be no general review of the Green Belt boundary through the Site Allocations DPD, although the Local Allocations will be permitted. Refers to small scale development being permitted if it is for a use defined as appropriate in national policy. (Note: Gypsy and Traveller sites, like other forms of residential development are considered 'inappropriate development'.)
CS22: New Accommodation for Gypsies and Travellers	Refers to priority being given to sites which are defined on the Proposal Map, with any other proposals being judged on the basis of need.

In addition to the above policies, paragraph 8.29 of the Core Strategy clearly states that with regard to the extent of the Green Belt within Dacorum "... *The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specified development needs. No further changes will be necessary in the Site Allocations DPD, other than to define these locations precisely and correct any minor anomalies that may still exist..... The Council will only re-evaluate the role and function of the Green Belt when it reviews the Core Strategy (see paragraphs 29.8 to 29.10).*"

The Council's specific approach to the allocation of sites for Gypsies and Travellers was set out in its response to the Core Strategy Hearing Issues Paper 7: Affordable Housing and Gypsies and Travellers. Paragraph 7.3.4 of this statement reads as follows:

"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 marginalization 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."

The policy context established by the Core Strategy sets the parameters for more detailed locational decisions within the Site Allocations DPD; governing the choice of sites within the various Schedules of Proposals and Sites in the Site Allocations DPD.

The application of these policies means that potential Gypsy and Traveller sites

previously considered in 2006-08 were not in conformity with the Core Strategy – with the exception of those located within what are now the Core Strategy Local Allocations¹. The majority of sites identified within the Scott Wilson Report (Examination Document HG15), plus the 2 additional site suggestions, were therefore discounted as no longer being reasonable alternatives.

Given this change in context, the only possible alternatives that remained for Gypsy and Traveller sites were therefore as constituent parts of the Local Allocations.

For the three smaller Local Allocations (LA2, LA4 and LA6) there were reasons as to why these sites could not be considered as reasonable alternatives and they were therefore discounted from further consideration. The reasons for discounting pitch provision on these sites, and therefore for them not being assessed in the Sustainability Report in terms of containing a potential Gypsy and Traveller element, are set out in Table 9 of Providing Homes and Community Services Background Issues Paper (Examination Document SA4).

The remaining three Local Allocations (LA1, LA3 and LA5) were considered to be reasonable alternatives and they were therefore assessed through the SA Report that accompanied the Pre-Submission Site Allocation DPD in 2014 (Examination Document SUB20). This SA used the appraisal from the Core Strategy SA Report for these sites, but updated this to take account of the inclusion of the Gypsy and Traveller site (and any other changes made to the planning requirements).

Dacorum's approach of allocating Gypsy and Traveller provision on sites to be excluded from the Green Belt within or adjacent to bricks and mortar housing is consistent with the revised Planning Policy for Travellers Sites (Examination Document REG4), issued in August 2015, and reflects practice increasingly seen in other Local Plans.

Case Law and Guidance

The Council has also considered relevant legal decisions when assessing the robustness of its approach to the consideration of reasonable alternatives: paying particular regard to the 'Plan Making Case Law Update: Main Issues 3: Sustainability Appraisals' (November 2014) published by the Planning Advisory Service (Examination Document OT8), together with advice from the Council's own legal adviser.

Recent High Court judgements considered to be of particular relevance are:

- Save Historic Newmarket Ltd v Forest Heath DC [2011] EWHC 606 (Admin) (25 March 2011); and
- Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government [2014] EWHC 406 (Admin) (21 February 2014); and
- Heard v Broadland DC [2012] EWHC 344 (Admin) (24 February 2012).

In the case of Save Historic Newmarket, the High Court quashed parts of the Forest Heath Core Strategy as there was a very marked lack of coverage and assessment of reasonable alternatives and increases to housing provision, and a complete failure in terms of explanation as to why the nominated alternatives had been rejected. As explained above, Dacorum has provided this explanation and these reasons will be repeated for completeness within the new SA addendum.

¹ Site D20 is located within Local Allocation LA2, sites D22 and D23 within LA3 and site D11 within LA5.

In the Ashdown Forest case, the judgement accepts that the choices made regarding the identification of reasonable alternatives for the purposes of environmental assessment *'are deeply enmeshed with issues of planning judgment, use of limited resources and the maintenance of a balance between the objective of putting a plan in place with reasonable speed..... and the objective of gathering relevant evidence and giving careful and informed considerations to the issues to be determined. The effect of this is that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify reasonable alternatives which should then be examined in greater detail.'* (para 90). As described above, the Council has determined what is, and what is not, a reasonable alternative at each stage of the plan making process.

The Inspector refers to the case of *Heard vs Broadland* and the fact that this judgement supports the requirement for reasonable alternatives to be assessed on a *'like-for-like basis.'* The Council's understanding of this judgement is that at one particular stage in the process, Broadland Council assessed their preferred option at a higher level of detail than other alternatives and that this was contrary to the SEA regulations. In other words, alternatives should always be looked at consistently *at each stage* of the plan-making process. This is the approach taken by Dacorum's sustainability appraisal process. The judgment does not mean that alternatives need to be considered on a like-for-like basis at *different stages*. To do so would ignore the iterative nature of both plan-production and the sustainability appraisal process.

This interpretation is supported by the Historic Newmarket judgement which clarifies that it is open to the plan-making authority, in the course of an iterative process of examination of possible alternatives, *'to reject alternatives at an early stage of the process and, provided there is no change of circumstances, to decide that it is unnecessary to revisit them'* (paragraph 16). It is accepted that this approach is subject to the proviso (in paragraph 17) that reasons have been given for the rejection of the alternatives (which, as explained above, Dacorum has done) and that those reasons are still valid if there has been any material change in circumstances (which in Dacorum's case there has not been).

The courts have also clarified that the explanation of reasonable alternatives, and the reasons for discounting other options, is a matter for the local planning authority: not for the sustainability appraisal process (see para 91 of the Ashdown Forest judgement). However, the new addendum to the SA Report (see above), will include these reasons for clarity, cross referring to, and quoting from, other published documents as necessary. The courts have also made clear that a detailed explanation of why reasonable alternatives have been chosen is not required. Rather it is only *'an outline of the reasons'* for selecting those alternatives which has to be provided (see para 93 of the Ashdown Forest judgment).

Approach to assessment

In terms of how the Gypsy and Traveller sites themselves are assessed, TRL Limited has treated these in the same way as for other forms of residential development. When assessing sites as part of a wider mixed-use scheme, such as within a Local Allocation, they have been considered as part of this wider scheme, rather than assessed as a separate element. This reflects the approach used elsewhere for other authorities who have allocated pitches within strategic sites. For example, in the SA that accompanies the Cheltenham / Tewkesbury / Gloucester Joint Core Strategy the only SA Objective against which an assessment is provided for the Gypsy and Traveller element of the site is *"15 HOUSING: Ensure everyone has*

access to a decent home that they can afford and meets their needs". The conclusion of this assessment is as follows:

"Major positive effects for contributing to the locally identified need for housing, including affordable housing and with the potential to provide accommodation for Gypsies, Travellers and/or Travelling Showpeople subject to meeting the requirement of Policy SD14 ..."

Charnwood Borough Council's Local Plan, which was adopted on 9th November 2015, includes Gypsy and Traveller pitches in two of its planned urban extensions. The associated Sustainability Report only refers to the Gypsy and Traveller element of these sites under the Housing Objective. Paragraph 94 of the Inspector's Report for this plan concludes that *"Policy CS5 is based on this evidence and seeks to meet identified needs as part of the strategic housing proposals and additional site allocations. I consider that in overall terms the policy takes a positive and proactive approach with a clear commitment to meet identified accommodation needs.....Bringing forward sites for Gypsy, Traveller and Travelling Showpeople accommodation as part of the strategic housing proposals would enable them to be well related to the main urban areas, to benefit from good access to services and facilities and to be delivered as part of a comprehensively planned development."*

Both of these examples use exactly the same approach as taken by Dacorum when assessing LA1, LA3 and LA5 (between Core Strategy and Site Allocations Pre-Submission), in terms of taking account of the explicit addition of the Gypsy and Traveller pitches within the schemes.

Teignbridge District Council has also taken the approach of accommodating Gypsy and Traveller pitches within two of its strategic allocations. The SA Report that accompanies this plan (adopted in May 2014) makes no explicit reference to the Gypsy and Traveller element of these sites, but succinctly states in the assessment against the housing objective that both sites propose *"a significant number of homes for all members of the community."*

All three cases support the Council's view that the same sustainability test applies to all forms of residential development – be they bricks and mortar homes or caravans.

In conclusion therefore, the Council considers that Dacorum has made rational and lawful choices regarding what are appropriate reasonable alternatives and that these have been appropriately assessed through the SA/SEA process. Due to decisions taken through the Core Strategy, and specifically the content of Policies CS2 and CS22, the sites now identified within the Site Allocations DPD are the only reasonable alternatives now available. No objections have been received either to the soundness of the Sustainability Appraisal undertaken, or any concerns raised that it does not fulfil the requirements of relevant legislation.

As the Council has already consulted upon all of the 'reasonable alternatives' identified at different stages of the Site Allocations process, it is satisfied that it has complied with the requirements of its Statement of Community Involvement (Examination Document SUB24), in terms of consultation on both the plan itself and the Sustainability Appraisal documents that accompanied each stage.

Impact on Examination Programme

In the light of the above, the Council does not consider that any further consultation is required relating to the issue of the viability of the planned Gypsy and Traveller provision, as this relates to an update of existing technical work. This approach accords with the adopted Statement of Community Involvement (SCI) (Examination Document SUB24), which only requires consultation on statutory planning documents; not the technical work that informs them. The Council recognises however that it would be appropriate to allow Barton Willmore and any other interested parties the opportunity to review this technical work before preparing their written hearing statements.

Similarly, as the Council is satisfied that the process of Sustainability Appraisal (incorporating Strategic Environmental Assessment) meets the requirements of relevant legislation and is robust, it is hoped that the Inspector will agree with this view on receipt of the addendum to the SA report. It is also hoped that the Inspector will support the Council's position that as the role of this addendum report is to add further explanation of the process already undertaken, and does not include any additional site assessments, that this too does not generate the need for any further public consultation.

However, if the Inspector does consider that any of the above work does require further consultation, the Council would welcome the opportunity to discuss this at a pre-examination meeting, due to the substantial implications such a requirement would have on the examination timetable. We are sure that the Inspector understands the Council's desire to finalise the Site Allocations DPD as soon as possible, in order to support delivery of the Local Allocations identified within its Core Strategy (one of which forms part of the Council's 5 year land supply). This also enables resources to be focused upon the early review of this Core Strategy, work on which is due to begin in 2016 with an Issues and Options consultation, with adoption scheduled for 2018.

Draft Project specification for the appointment of consultants to update to the development viability testing for local allocations LA1, LA3 and LA5

Strategic Planning and Regeneration

PROJECT SPECIFICATION FOR THE APPOINTMENT OF CONSULTANTS

UPDATE TO THE DEVELOPMENT VIABILITY TESTING FOR LOCAL ALLOCATIONS LA1, LA3 and LA5



Background to the Brief

Dacorum Borough Council submitted its Site Allocations DPD to the Planning Inspectorate for public examination on 05 February 2016. The document includes the allocation of six urban extensions known as 'Local Allocations', which were identified for release from the Green Belt for primarily residential development in the adopted Core Strategy. Whilst the viability of delivering the Local Allocations was tested in 2013 through evidence for the CIL examination, the Council now require the evidence to be re-tested for 3 of the Local Allocations.

Representations to the Pre-Submission Site Allocations Consultation made by Barton Willmore on behalf of CALA Homes (who control the majority of land for one of the Local Allocations: LA5) raise concerns about the impact of the requirement to deliver a traveller site on the viability of the delivery of the Local Allocation. Further, the representation asserts that the Council has not tested the viability of delivering all the policy requirements of the site, because the viability assessment undertaken in 2013 did not consider the requirement to deliver a traveller site.

'An obligation to provide land for a travellers' site is a significant and onerous planning obligation with potentially serious adverse consequences for the viability of the proposed development... Overall, the sites identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened (NPPF, para 173)... There has been no assessment of the impact of providing a traveller site on the viability of site LA5. In particular, the, likely significant, impact of the traveller site on the value of the market housing has not been considered.' (Extracts from representation made by Barton Willmore, November 2014).

The inspector, in her pre-hearing correspondence to the Council, has asked that this evidence is provided.

'...in terms of the viability testing of the Plan...the primary role...is to provide evidence to show that...the policy requirements for development...do not threaten the ability of the sites and scale of that development to be developed viably. While I note that...LA1 – LA6 were tested in detail in 2013, that work did not consider the inclusion of traveller sites within them...The landowner of site LA5 has questioned the viability of this site now that there is a requirements for a traveller site to be provided as part of it. Whether or not this site is viable is critical...it forms part of the Council's 5 year supply of deliverable housing land and is required to meet the identified traveller pitch requirements for this period...Can you please explain whether this work has

been carried out...If it has not been done can you please explain how the Council intend to rectify this...' (Extract from letter from Planning Inspector to the Council, 18 March 2016)

Purpose and Methodology

The National Planning Policy Framework (NPPF) expects authorities to ensure the planning obligations and policy burdens on development sites do not threaten the ability of development sites to be developed viably.

In order to support the Site Allocations DPD, the Council requires consultants to prepare updates to the viability assessments, undertaken in 2013, of the 3 Local Allocation sites with a requirement to provide traveller sites. The update will reach conclusions about the ability of the 3 sites to be delivered viably, taking into account likely planning obligations and other planning requirements. The report will be used as evidence to support the Council's Site Allocations DPD.

The assessment should use the methodology from the Dacorum Borough Council CIL Strategic Sites Testing, BNP Paribas Real Estate (October 2013), where possible to retain a degree of consistency. Inputs to the assessment should be updated using most up to date information.

The consultants will:

- Assess the ability of the sites known as LA1, LA3 and LA5 to be delivered viably taking into account all planning requirements and obligations as set out in the Site Allocations DPD and CIL Charging Schedule;
- Ensure the assessment takes full and proper account of the requirement to deliver a traveller site on each of the Local Allocations tested;
- Ensure the assessment is informed by appropriate and up to date evidence sources and planning policy documents including:
 - The Site Allocations pre-submission document incorporating Focused Changes Written Statement and Map Book;
 - Masterplans for the Local Allocations prepared for the Site Allocations examination;²
 - The Dacorum Borough Council CIL Strategic Sites Testing, BNP Paribas Real Estate (October 2013);
 - The Representations made by Barton Willmore (November 2014);
 - The letter from the Planning Inspector to the Council (March 2016);
 - assessments of planning obligation requirements for each site (to be provided by DBC in liaison with HCC);
 - the IDP update (2015);
 - the adopted Core Strategy September 2013;
 - the Affordable Housing SPD; and
 - Any available evidence regarding the cost of delivering traveller sites.

² Note: These master plans are in draft form and do not form part of the formal Site Allocations examination process. They do however elaborate on the content of the Local Allocations policies and may therefore offer further relevant information regarding the Council's expectations for each site.

- Undertake sensitivity testing on development viability to take account of potential changes to:
 - the tenure of affordable housing required³
 - the build cost
 - the CfSH level required⁴
 - sales values

The consultants may be required to attend, and represent the Council at, the hearing for the Site Allocations DPD and should indicate their willingness to act as an 'expert witness'. They should also provide the Council with an indication of the likely cost of representing the Council at the hearing.

Local Allocations

The Council expects the consultants to assess the viability of delivering Local Allocations LA1, LA3 and LA5 (N.B some of the development requirements have changed slightly since the previous assessment).

Local Allocation LA1 (Marchmont Farm):

- 300-350 dwellings;
- Provision of 40% affordable housing;
- Contributions towards improving local services and facilities at Grovehill local centre;
- Contributions towards improving local and social infrastructure;
- Contributions towards key off site transport works;
- A traveller site of 5 pitches;
- An extension to Margaret Lloyd Park;
- The provision of a locally equipped area of play (LEAP);
- The inclusion of a sustainable drainage (SUDS) basin; and
- Payment of CIL at £100/sqm.

Local Allocation LA3 (West Hemel Hempstead):

- 900 dwellings;
- Provision of 40% affordable housing;
- Provision of a shop, doctors surgery and additional social and community provision including a new primary school;
- Contributions towards key off site transport works;
- A traveller site of 7 pitches;
- An extension to Shrubhill Common Nature Reserve; and
- The provision new open space/playing fields.

Local Allocation LA5 (Icknield Way, West of Tring):

- 180-200 dwellings;
- Provision of 40% affordable housing;

³ Note: It can be assumed that the pitches can count as 'affordable housing'; in terms of contributing to the overall site requirements.

⁴ It is recognised that the CfSH is no longer a standard that can be required through the planning process. It does however still provide a useful proxy to assess different standards of sustainable design and construction; and hence development costs

- An extension of around 0.75 hectares to the Icknield Way Industrial Estate for B-class uses;
- Contributions towards key off site transport works;
- A traveller site of 5 pitches;
- An extension to the cemetery of around 1.6 hectares⁵;
- The provision of open space of around 6.1 hectares;
- The provision of a play area for toddlers and a play area for older children; and
- Payment of CIL at £150/sqm.

The Council will provide maps showing the location and proposed layout of each site and masterplans prepared for the Site Allocations by the Council and landowners.

In terms of the Gypsy and Traveller sites, the Council's expectation is that the developers will be required to provide the land as a basic 'serviced site' i.e. make the land available, with an appropriate access point and connection to essential utilities.

Based on the existing Long Marston site (which is of a comparable size to sites being sought through the Site Allocations) it is estimated that a 7 pitch site should be approximately 0.7ha and a 5 pitch site should be approximately 0.5ha in size.

If any viability issues are highlighted for any of the three sites, then the consultants should set out clear recommendations regarding how these could potentially be resolved.

Timescales

A draft report should be delivered to the Council in the week commencing 13th June 2016. A final report should be issued to the Council in the week commencing 20th June 2016.

Input from Dacorum Borough Council

If required, an inception meeting will take place between the Consultant and Officers from the Strategic Planning and Regeneration team. Subject to agreement, this can be held either at Dacorum's offices or those of the Consultant. Regular updates will be provided as necessary by email/phone.

DBC will also continue to seek copies of any research carried out which can be used to inform assumptions regarding the likely implications of the Gypsy and Traveller site upon site viability. This information will be sought from:

- Adjoining authorities;
- Planning Officers Society (POS);
- Planning Advisory Service (PAS);
- Local Government Association (LGA); and
- Gypsy and Traveller Unit at Hertfordshire County Council.

⁵ The expectation is that the Council will buy land at appropriate value – so no direct costs to developer for its provision.

Any information will be passed to the consultants as soon as possible.

Reporting and Contact Details

The consultant will report directly to the Assistant Team Leader.

Contacts are:

First point of contact:

Heather Overhead, Assistant Team Leader, Strategic Planning and Regeneration
01442 228083 heather.overhead@dacorum.gov.uk

Second points of contacts:

Laura Wood, Team Leader (Strategic Planning) Strategic Planning and
Regeneration 01442 228661; laura.wood@dacorum.gov.uk

James Doe, Assistant Director – Planning Development and Regeneration, 01442
228583; james.doe@dacorum.gov.uk

The report should meet the requirements of this brief, and take into account the local context.

Other outputs are:-

TBC

CONTRACTUAL ARRANGEMENTS

TBC

PAYMENT SCHEDULE

Full payment to be made upon satisfactory completion of the work.