



Site Allocations Report of Representations

Part 2

Contains:

- **Annex B: Results**
 - **List of Respondents**
 - **Number of Representations**
 - **Main Issues Raised and Council's Response**
 - **Suggested changes to Site Allocations document**

July 2015

This publication is **Part 2 of the Report of Representations to the Pre-Submission Site Allocations**: it contains the results of the consultation on the Pre-Submission Site Allocations.

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

Obtaining this information in other formats:

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

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

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ANNEX A: NOTIFICATION

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Table 1 – List of Groups / Individuals from whom Representations were received

Note: Includes both supporting and objecting comments.

Person ID	Full Name	Organisation Details	Agent ID	Agent Full Name	Agent Organisation Details
496443		Grand Union Investments	372732	Ms Jane Barnett	Director Savills
404973		Taylor Wimpey UK Limited	875690	Ms Nicky Parsons	Pegasus Group
903173	Abbots Hill School		903171	Mr Brian Kavanagh	Planner Nicholas Taylor & Associates
875694	Albion Land Ltd	Albion Land Ltd	875692	Miss Hannah Smith	Quod
628226	Barratt North London		876515	Ms Sarah Smith	Rapleys LLP
869543	Cllr Christopher Townsend				
869807	Dr Lynne Dyson				
868868	Dr Melvyn Else				
871155	Ediston Real Estate/Tesco Pension F	Ediston Real Estate/Tesco Pension Fund	874746	Mr Alex Mitchell	GVA James Barr
874787	English Sangha Trust	English Sangha Trust	335240	Rolfe Judd Planning	Rolfe Judd Ltd
874976	Lady Valerie Corbett				
865181	Miss Dawn Lloyd	Sustainable Places Planning Advisor Environment Agency			
864722	Miss Jenefer Rainnie				
399977	Miss Joanna Willcox		874750	Mr Andrew Black	Associate Director PRP Planning
865531	Mr Adam Bell				
498273	Mr AlanBarker		619659	Mr David Lane	DLA Town Planning Ltd
869317	Mr AlistairBrodie	Henry H Bletsoe & Son LLP			
875697	Mr Andrew Brown	Ash Mill Developments Ltd	875695	Mr Andrew Watson	Town Planner Smiths Gore
869013	Mr Andrew Whitehead				
869569	Mr Barry Burchett				
871287	Mr Ben Coles	Strategic Land Project Manager Taylor Wimpey UK Limited	210999	Mr Martin Friend	Director Vincent & Gorbing
874973	Mr Bharath Devaiah	SGN, South Strategy			
489516	Mr Christopher Allen	Hon. Secretary			

Person ID	Full Name	Organisation Details	Agent ID	Agent Full Name	Agent Organisation Details
		Tring Sports Forum			
869016	Mr ColinRees				
211503	Mr Colin White	Planning Officer Chilterns Conservation Board			
485861	Mr Cornelius Nicoll				
398225	Mr David Broadley	Aylesbury Vale District Council			
869006	Mr David Glover				
864453	Mr Dennis Harvey				
868530	Mr Dennis Parker				
611329	Mr Derek Proctor				
627639	Mr DouglasArchibald				
334816	Mr Douglas Fisher				
619662	Mr Euan Macdonald	Unknown	619659	Mr David Lane	DLA Town Planning Ltd
211625	Mr Gardener		611650	Mr John Heginbotham	Director Stimpsons
868587	Mr Gary Cox	Berkhamsted Town Council			
868491	Mr Graham Hoad				
868535	Mr Guy Moores				
865119	MR HOWARD MARTIN	Senior Asset Manager RBS Real Estate Asset Management	865117	MR CRAIG ALSBURY	Senior Director GVA
871205	Mr Hugh Cooper	Macdonald Hotels	871198	Mr Sebastian Tibenham	Director Pegasus Group
868526	Mr James Malcolm				
863317	Mr John Allan				
868582	Mr John Monk		868581	Mr Michael Townsend	Townsend Planning Consultants
869011	Mr John Savage				
864376	Mr John Walker	Chairman, Environment/Planning Sub Committee LGVA			
871147	Mr Jonathan Culverhouse				
865009	Mr Keith Everett				
871184	Mr Kevin Brackley	Director Chiltern of Bovingdon Ltd			

Person ID	Full Name	Organisation Details	Agent ID	Agent Full Name	Agent Organisation Details
868710	Mr Kevin Owen	Team Leader Local Plans Luton Borough Council			
777774	Mr Mark Matthews	Thames Water Property Services	230063	Miss Carmelle Bell	Savills
610088	Mr Martin Hicks	Ecology Officer Hertfordshire County Council			
874972	Mr Matt Brooks				
211055	Mr Matthew Wood	Senior Planning Officer Hertfordshire County Council			
868541	Mr Michael Curry	Town Clerk Tring Town Council			
494131	Mr Michael Emmett	Strategic Land Director CALA Homes	743732	Mr Simon Prescott	Barton Willmore
875689	Mr Michael Fearn	Shireconsulting			
214455	Mr Michael Stubbs	Land Use & Planning Adviser The National Trust			
864369	Mr Mike Ridley				
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Director Maze Planning Ltd
866203	Mr Nick Gough	HCC			
211068	Mr Nick Harper	The Crown Estate	742857	Mr. Bob Sellwood	
378447	Mr Paul Donovan	Hertfordshire County Council			
743858	Mr PaulPhipps	Whiteacre Ltd			
868955	Mr Richard Allison				
627381	Mr Richard James		627379	Mr John Boyd	Director JB Planning Associates
868871	Mr Robert Grant	The Berkhamsted Schools Group	868870	Mr Greg Dowden	Indigo Planning Ltd
875698	Mr Rod Latham				
871128	Mr Rod Rogers	Castlemead Homes Ltd	626819	Mr Chris Watts	Director Maze Planning Ltd
503097	Mr Roger Tym	Quilichan Consultancy			
868695	Mr Simon Vince	Heathrow Airport Limited			
876510	Mr Simon Ware				
868790	Mr Stephen Borrows	Planning Officer Chiltern District Council			

Person ID	Full Name	Organisation Details	Agent ID	Agent Full Name	Agent Organisation Details
500056	Mr Stephen Lucas	Lucas Land & Planning			
737184	Mr Tim Noden	Planning Manager Harrow Estates	868800	Mr Sam Ryan	Director Turley Estates
56252	Mr Tom Gilbert-Wooldridge	Principal Historic Environment Planning Advisor Historic England			
869806	Mr Zachary Thole				
868691	Mr & Mrs Richard & Genny Askew				
627676	Mr and Mrs Michael and Gill Glasser				
490562	Mr. Michael Nidd				
772477	Mr. Roy Warren	Planning Manager Sport England			
865560	Mr. Thomas Talbot-Ponsonby		865558	Mr. James Holmes	Aitchison Raffety
869274	Mrs Christine Mildred				
871135	Mrs Francoise Culverhouse				
770860	Mrs Heather Ebdon				
774832	Mrs Irene Chard				
871216	Mrs Jane Thompson				
869808	Mrs Joyce Lear				
869278	Mrs Judith Wade				
864717	Mrs Kate Harwood	Conservation & Planning Officer Hertfordshire Gardens Trust			
864135	Mrs Laurie Eagling	Clerk Pitstone Parish Council			
864750	Mrs Madalena Borg				
868572	Mrs Margaret Stafford				
868972	Mrs Nicky Harburn				
869019	Mrs Shelley Savage				
211488	Ms Alison Cockerill				
869129	Ms Ann Hetherington				
871213	Ms Carole Butcher				
221884	Ms Eliza Hermann				

Person ID	Full Name	Organisation Details	Agent ID	Agent Full Name	Agent Organisation Details
617246	Ms Janet Nuttall	Planning and Conservation Advisor Natural England			
774843	Ms Jennie Sewell				
871902	Ms Keira Murphy	Planning Specialist Environment Agency			
330218	Ms Lynn Riley				
865540	Ms Sarah Ewart		865538	Mr Roger Dunn	
864666	Ms Tracy Puttock	Planning Manager Ashill Land Ltd			
211658	Ms Victoria Lindsey	Committee member Piccotts End Residents Association			
742248	Ms. Jenny Volp	Highways Agency			
500752	National Grid Property & Gas		500725	Mr Mark Wilson	Vincent & Gorbing
498429	Steve Baker	CPRE - The Hertfordshire Society			
874969	Techno Limited	Techno Limited	874968	Miss Wakako Hirose	Rapleys LLP
875696	The St. Rose of Lima	The St. Rose of Lima Association	875695	Mr Andrew Watson	Town Planner Smiths Gore
502697	unknown	Waterside Way Sustainable Planning Ltd	210986	Mr Stephen Harris	Senior Consultant Emery Planning Partnership
503032	W Lamb	W Lamb Ltd	868494	Miss Julia Mountford	Boyer Planning
864365	WHAG	Chair West Hemel Action Group	864362	Mr Lee Royal	Chair West Hemel Action Group

Table 2 – Number of Representations Considered

¹ Representations recorded against a section heading relate to the *whole* of that section

² The sum of the objections (columns 5 – 9) in each row does not necessarily equal the total objecting in column 4. An objector may give more than one reason for their objection. Additionally, some people have suggested an amendment to specific text, policy etc, even though their comments are registered as supporting.

Site Allocations Reference	Number of Representations								Comments ²
	Total received	Total in support	Total objecting	Objections					
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
Forward ¹	-	-	-	-	-	-	-	-	-
PART A									
1. Introduction	2	2	-	-	-	-	-	-	1
Text: 1.1-1.22	4	2	2	-	2	-	-	-	4
Figure 1	-	-	-	-	-	-	-	-	-
Map 1	-	-	-	-	-	-	-	-	-
Figure 2	-	-	-	-	-	-	-	-	-
Summary of Content	-	-	-	-	-	-	-	-	-
Map 2	1	-	1	-	1	-	1	-	1
PART B									
The Sustainable Development Strategy	-	-	-	-	-	-	-	-	-
Strategic Objectives	-	-	-	-	-	-	-	-	-
2. Promoting Sustainable Development	-	-	-	-	-	-	-	-	-
Text: 2.1-2.3	2	-	2	-	2	1	1	-	2
Policy SA1	5	1	4	1	4	3	3	4	5
Text: 2.4-2.11	15	2	13	4	13	6	2	11	15
Green Belt Boundary Amendments (from Map Book)	-	-	-	-	-	-	-	-	-
GB/1	-	-	-	-	-	-	-	-	-
GB/2	-	-	-	-	-	-	-	-	-
GB/3	2	1	1	1	1	1	-	1	1
GB/4	-	-	-	-	-	-	-	-	-
GB/5	-	-	-	-	-	-	-	-	-
GB/6	-	-	-	-	-	-	-	-	-
GB/7	-	-	-	-	-	-	-	-	-
GB/8	-	-	-	-	-	-	-	-	-
GB/9	2	1	1	-	1	-	-	1	2
GB/10	1	-	1	-	1	-	-	1	1
GB/11	-	-	-	-	-	-	-	-	-
GB/12	-	-	-	-	-	-	-	-	-
GB/13	-	-	-	-	-	-	-	-	-
GB/14	-	-	-	-	-	-	-	-	-
GB/15	-	-	-	-	-	-	-	-	-
GB/16	-	-	-	-	-	-	-	-	-
GB/17	-	-	-	-	-	-	-	-	-
GB/18	-	-	-	-	-	-	-	-	-

Site Allocations Reference	Number of Representations								Comments ²
	Total received	Total in support	Total objecting	Objections					
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
GB/19	1	1	-	-	-	-	-	-	-
GB/20	-	-	-	-	-	-	-	-	-
Small Villages in the Green Belt (from Map Book)	-	-	-	-	-	-	-	-	-
VB/1	3	1	2	-	-	-	-	-	2
VB/2	-	-	-	-	-	-	-	-	-
VB/3	-	-	-	-	-	-	-	-	-
Small Villages in the Rural Area (from Map Book)	-	-	-	-	-	-	-	-	-
VB/4	-	-	-	-	-	-	-	-	-
VB/5	-	-	-	-	-	-	-	-	-
Policy SA2	5	2	3	-	3	1	1	1	5
Schedule of Major Developed Sites	4	3	1	-	1	1	1	1	1
Major Developed Sites in the Green Belt (from Map Book)	-	-	-	-	-	-	-	-	-
MDS/1	-	-	-	-	-	-	-	-	-
MDS/2	-	-	-	-	-	-	-	-	-
MDS/3	-	-	-	-	-	-	-	-	-
MDS/4	-	-	-	-	-	-	-	-	-
MDS/5	-	-	-	-	-	-	-	-	-
MDS/6	-	-	-	-	-	-	-	-	-
MDS/7	-	-	-	-	-	-	-	-	-
Text: 2.12-2.13	1	-	1	1	1	1	-	1	1
Schedule of Mixed Use Proposals and Sites	6	1	5	1	1	-	-	-	6
Mixed Use Proposals (from Map Book)	-	-	-	-	-	-	-	-	-
MU/1	-	-	-	-	-	-	-	-	-
MU/2	-	-	-	-	-	-	-	-	-
MU/3	-	-	-	-	-	-	-	-	-
MU/4	-	-	-	-	-	-	-	-	-
MU/5	-	-	-	-	-	-	-	-	-
MU/6	-	-	-	-	-	-	-	-	-
MU/7	1	-	1	-	1	-	-	-	1
3. Enabling Convenient Access between Homes, Jobs and Facilities	1	-	1	-	1	1	1	-	1
Text: 3.1-3.9	4	-	4	-	4	4	1	-	4
Policy SA3	3	1	2	-	2	1	1	1	3
Text: 3.10	1	-	1	-	1	-	-	-	1
Policy SA4	-	-	-	-	-	-	-	-	-
Schedule of Transport Proposals and Sites	3	3	-	-	-	-	-	-	3

Site Allocations Reference	Number of Representations								
	Total received	Total in support	Total objecting	Objections					Comments ²
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
Transport Sites and Proposals (from Map Book)	-	-	-	-	-	-	-	-	-
T/1	-	-	-	-	-	-	-	-	-
T/2	-	-	-	-	-	-	-	-	-
T/3	-	-	-	-	-	-	-	-	-
T/4	-	-	-	-	-	-	-	-	-
T/5	-	-	-	-	-	-	-	-	-
T/6	-	-	-	-	-	-	-	-	-
T/7	-	-	-	-	-	-	-	-	-
T/8	-	-	-	-	-	-	-	-	-
T/9	-	-	-	-	-	-	-	-	-
T/10	-	-	-	-	-	-	-	-	-
T/11	-	-	-	-	-	-	-	-	-
T/12	-	-	-	-	-	-	-	-	-
T/13	-	-	-	-	-	-	-	-	-
T/14	-	-	-	-	-	-	-	-	-
T/15	-	-	-	-	-	-	-	-	-
T/16	-	-	-	-	-	-	-	-	-
T/17	1	-	1	-	1	-	-	-	1
T/18	1	-	1	-	1	-	-	-	1
T/19	1	-	1	-	1	-	-	-	1
T/20	-	-	-	-	-	-	-	-	-
T/21	-	-	-	-	-	-	-	-	-
T/22	-	-	-	-	-	-	-	-	-
T/23	-	-	-	-	-	-	-	-	-
4. Providing for Offices, Industry, Storage and Distribution	-	-	-	-	-	-	-	-	-
Text: 4.1-411	-	-	-	-	-	-	-	-	-
Policy SA5	9	5	4	-	4	3	-	3	9
General Employment Areas (from Map Book)	-	-	-	-	-	-	-	-	-
GEA1: Apsley Mills	-	-	-	-	-	-	-	-	-
GEA2: Corner Hall	-	-	-	-	-	-	-	-	-
GEA3: Frogmore	-	-	-	-	-	-	-	-	-
GEA4: Nash Mills	-	-	-	-	-	-	-	-	-
GEA5: Paradise/Wood Lane End	-	-	-	-	-	-	-	-	-
GEA6: Two Waters	-	-	-	-	-	-	-	-	-
GEA7: Billet Lane	-	-	-	-	-	-	-	-	-
GEA8: Akeman Street	1	-	1	-	1	1	-	1	1
GEA9: Icknield Way	-	-	-	-	-	-	-	-	-
GEA10: Markyate	-	-	-	-	-	-	-	-	-

Site Allocations Reference	Number of Representations								Comments ²
	Total received	Total in support	Total objecting	Objections					
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
Text: 4.12-4.13	-	-	-	-	-	-	-	-	-
Policy SA6	1	1	-	-	-	-	-	-	1
Schedule of Employment Proposals and Sites	1	1	-	-	-	-	-	-	1
Employment Areas in the Green Belt (from Map Book) Bourne End Mills Bovingdon Brickworks Employment Proposal Site MU/3 E/1 Dacorum Local Plan Saved Schedule (for Chapter 4)	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-	-
5. Supporting Retailing and Commerce	-	-	-	-	-	-	-	-	-
Text: 5.1-5.10	-	-	-	-	-	-	-	-	-
Policy SA7	-	-	-	-	-	-	-	-	-
Text: 5.11-5.19	-	-	-	-	-	-	-	-	-
Table 1	1	-	1	-	1	1	-	-	1
Text: 5.20	-	-	-	-	-	-	-	-	-
Schedule of Retail Proposals and Sites	2	1	1	-	1	1	-	-	2
Proposed Retail Frontages: Hemel Hempstead (From Map Book)									
Proposed Retail Frontages: Berkhamsted	-	-	-	-	-	-	-	-	-
Proposed Retail Frontages: Tring	-	-	-	-	-	-	-	-	-
New Retail Designation: Jarman Fields	-	-	-	-	-	-	-	-	-
New Retail Designation: London Road/Two Waters Way	-	-	-	-	-	-	-	-	-
New Retail Designation: Billett Lane	-	-	-	-	-	-	-	-	-
Shopping Proposal	-	-	-	-	-	-	-	-	-
S1	-	-	-	-	-	-	-	-	-
6. Providing Homes	6	3	3	-	3	1	1	2	6
Text: 6.1-6.12	6	1	5	-	5	5	4	5	6
Table 2	-	-	-	-	-	-	-	-	-
Text: 6.13-6.16	1	-	1	-	1	1	1	1	1
Table 3	2	-	2	-	2	2	1	2	2
Text: 6.17-6.30	6	-	6	1	6	6	4	6	6
Policy SA8	3	2	1	-	1	1	1	1	3
Policy LA1	13	2	11	9	11	10	10	11	13
Map LA1	-	-	-	-	-	-	-	-	-
Policy LA2	6	2	4	2	4	3	4	4	6

Site Allocations Reference	Number of Representations								Comments ²
	Total received	Total in support	Total objecting	Objections					
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
Map LA2	-	-	-	-	-	-	-	-	-
Policy LA3	12	7	5	4	8	5	5	6	13
Map LA3	1	-		-	1	1	1	-	1
Policy LA4	8	3	5	2	5	4	4	5	8
Map LA4	1	0	1	0	0	0	0	0	1
Policy LA5	26	4	22	7	22	14	8	15	26
Map LA5	1	-	1	-	1	1	1	-	1
Policy LA6	5	2	3	1	3	2	1	2	5
Map LA6	-	-	-	-	-	-	-	-	-
Text: 6.31-6.34	-	-	-	-	-	-	-	-	-
Table 4	1	-	1	-	1	1	-	-	1
Text: 6.35-6.41	1	-	1	1	1	1	-	1	1
Policy SA9	3	1	2	-	2	2	-	2	3
Schedule of Housing Proposals and Sites including Map Book responses	2	1	1	-	1	1	-	-	1
	2	1	1	-	1	1	-	-	2
	3	3	-	-	-	-	-	-	3
	1	1	-	-	-	-	-	-	1
	1	1	-	-	-	-	-	-	1
	3	2	1	-	1	-	-	-	1
	2	1	1	-	-	1	1	-	2
	2	1	1	-	1	1	-	-	2
	1	1	-	-	-	-	-	-	1
	1	1	-	-	-	-	-	-	1
	3	2	1	-	1	-	-	-	3
	1	1	-	-	-	-	-	-	1
	1	1	-	-	-	-	-	-	1
	1	1	-	-	-	-	-	-	1
	2	1	1	-	1	-	-	-	2
	3	2	1	-	-	-	-	-	3
	3	2	1	-	-	-	-	-	2
	3	2	1	-	1	-	-	-	3
	2	1	1	-	1	-	-	-	2
	2	2	-	-	-	-	-	-	2
	3	2	1	-	2	1	-	2	3
	1	1	-	-	-	-	-	-	1
	2	1	1	-	1	-	-	-	2
	1	1	-	-	-	-	-	-	1
	2	1	1	-	-	1	1	1	2
	Schedule of Mixed Use Housing Proposals	5	2	3	1	3	-	1	1

Site Allocations Reference	Number of Representations								Comments ²
	Total received	Total in support	Total objecting	Objections					
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
7. Meeting Community Needs	4	-	4	-	3	3	1	1	4
Text: 7.1-7.3	-	-	-	-	-	-	-	-	-
Table 5	-	-	-	-	-	-	-	-	-
Text: 7.4-7.11	-	-	-	-	-	-	-	-	-
Policy SA10	1	1	-	-	-	-	-	-	1
Schedule of Social and Community Proposals and Sites	4	2	2	-	2	1	1	-	4
Text: 7.12-7.16	3	1	2	-	2	2	1	2	3
Schedule of Leisure Proposals and Sites	5	3	2	1	2	1	1	1	5
Social and Community Facilities (from Map Book)	-	-	-	-	-	-	-	-	-
C/1	-	-	-	-	-	-	-	-	-
C/2	-	-	-	-	-	-	-	-	-
Education Zones	1	-	1	-	1	-	-	-	1
EZ/1	-	-	-	-	-	-	-	-	-
EZ/2	-	-	-	-	-	-	-	-	-
EZ/3	2	-	2	1	2	2	1	1	1
Dacorum Borough Local Plan 1991-2011 Social and Community Facilities Proposals	-	-	-	-	-	-	-	-	-
Leisure and Cultural Facilities	-	-	-	-	-	-	-	-	-
L/1	-	-	-	-	-	-	-	-	-
L/2	-	-	-	-	-	-	-	-	-
L/3	-	-	-	-	-	-	-	-	-
Open Land	-	-	-	-	-	-	-	-	-
OL/1	-	-	-	-	-	-	-	-	-
OL/2	-	-	-	-	-	-	-	-	-
OL/3	-	-	-	-	-	-	-	-	-
OL/4	-	-	-	-	-	-	-	-	-
OL/5	3	1	2	1	2	2	1	2	2
Dacorum Borough Local Plan 1991-2011 Leisure and Tourism Proposals	-	-	-	-	-	-	-	-	-
Dacorum Borough Local Plan 1991-2011 Saved Schedule	-	-	-	-	-	-	-	-	-
8. Enhancing the Natural Environment	2	2	-	-	-	-	-	-	1
Strategic Objectives	-	-	-	-	-	-	-	-	-
Introduction	-	-	-	-	-	-	-	-	-
Table 6	-	-	-	-	-	-	-	-	-
Text: 8.1-8.12	-	-	-	-	-	-	-	-	-
Enhancing the Natural Environment	-	-	-	-	-	-	-	-	-

Site Allocations Reference	Number of Representations								Comments ²
	Total received	Total in support	Total objecting	Objections					
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
(from the Map Book)									
(a) Protecting and Improving the Landscape	-	-	-	-	-	-	-	-	-
Chilterns AONB	-	-	-	-	-	-	-	-	-
Article 4 Directions	-	-	-	-	-	-	-	-	-
(b) Biodiversity and Geological conservation	-	-	-	-	-	-	-	-	-
Local Nature Reserves	-	-	-	-	-	-	-	-	-
Sites of Special Scientific Interest	-	-	-	-	-	-	-	-	-
Regionally Important Geological Sites	-	-	-	-	-	-	-	-	-
Ancient Woodland	-	-	-	-	-	-	-	-	-
Special Area of Conservation	1	1	-	-	-	-	-	-	-
Wildlife Sites	-	-	-	-	-	-	-	-	-
9. Conserving the Historic Environment	1	1	-	-	-	-	-	-	-
Text: 9.1-9.9	2	-	2	2	2	2	2	2	2
(From Map Book)	-	-	-	-	-	-	-	-	-
Areas of Archaeological Significance	-	-	-	-	-	-	-	-	-
Conservation Areas	-	-	-	-	-	-	-	-	-
Nationally Registered Park or Garden of Historic Interest	-	-	-	-	-	-	-	-	-
Locally Registered Park or Garden of Historic Interest	-	-	-	-	-	-	-	-	-
Scheduled Monuments	-	-	-	-	-	-	-	-	-
10. Introduction to Place Strategies	2	2	-	-	-	-	-	-	2
Text: 10.1-10.2	2	2	-	-	-	-	-	-	2
11. Hemel Hempstead Place Strategy	1	1	-	-	-	-	-	-	1
Text: 11.1-11.2	-	-	-	-	-	-	-	-	-
Schedule for Hemel Hempstead	1	-	1	-	1	-	-	1	1
Text: 11.3	-	-	-	-	-	-	-	-	-
Hemel Hempstead Place Strategy Map	-	-	-	-	-	-	-	-	-
South Hemel Hempstead Inset Map	-	-	-	-	-	-	-	-	-
Hemel Hempstead Town Centre Inset Map	-	-	-	-	-	-	-	-	-
12. Berkhamsted Place Strategy	-	-	-	-	-	-	-	-	-
Text:12.1-12.2	1	1	-	-	-	-	-	-	1
Schedule for Berkhamsted	-	-	-	-	-	-	-	-	-
Text: 12.3	-	-	-	-	-	-	-	-	-
Berkhamsted Place Strategy Map	-	-	-	-	-	-	-	-	-
13. Tring Place Strategy	2	-	2	-	2	1	1	1	1
Text: 13.1-13.2									

Site Allocations Reference	Number of Representations								Comments ²
	Total received	Total in support	Total objecting	Objections					
				Saying the Site Allocations is					
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
Schedule for Tring	2	-	2	-	2	2	1	1	2
Text: 13.3	-	-	-	-	-	-	-	-	-
Tring Place Strategy Map	-	-	-	-	-	-	-	-	-
14. Kings Langley Place Strategy	-	-	-	-	-	-	-	-	-
Text: 14.1-14.2	1	1	-	-	-	-	-	-	1
Schedule for Kings Langley	-	-	-	-	-	-	-	-	-
Text: 14.3	-	-	-	-	-	-	-	-	-
Kings Langley Place Strategy Map	-	-	-	-	-	-	-	-	-
15. Bovingdon Place Strategy	-	-	-	-	-	-	-	-	-
Text: 15.1-15.2	3	2	1	-	1	1	1	-	3
Schedule for Bovingdon	1	1	-	-	-	-	-	-	1
Text: 15.3	-	-	-	-	-	-	-	-	-
Bovingdon Place Strategy Map	-	-	-	-	-	-	-	-	-
16. Markyate Place Strategy	-	-	-	-	-	-	-	-	-
Text: 16.1-16.2	1	1	-	-	-	-	-	-	1
Schedule for Markyate	-	-	-	-	-	-	-	-	-
Text: 16.3	-	-	-	-	-	-	-	-	-
Bovingdon Place Strategy Map	-	-	-	-	-	-	-	-	-
17. Countryside Place Strategy	-	-	-	-	-	-	-	-	-
Text: 17.1-17.2	-	-	-	-	-	-	-	-	-
Schedule for Countryside	-	-	-	-	-	-	-	-	-
Text: 17.3	-	-	-	-	-	-	-	-	-
Countryside Strategy Map	-	-	-	-	-	-	-	-	-
PART C									
Implementation and Delivery	-	-	-	-	-	-	-	-	-
Strategic Objectives	-	-	-	-	-	-	-	-	-
18. Monitoring and Review	1	1	-	-	-	-	-	-	1
Text: 18.1-18.8	2	1	1	1	1	1	1	1	2
PART D									
Appendices	-	-	-	-	-	-	-	-	-
Appendix 1	-	-	-	-	-	-	-	-	-
Appendix 2	2	1	1	1	2	2	1	1	2
Appendix 3	-	-	-	-	-	-	-	-	-
Appendix 4	-	-	-	-	-	-	-	-	-
Appendix 5	-	-	-	-	-	-	-	-	-
Appendix 6	-	-	-	-	-	-	-	-	-
TOTAL	294	118	172	43	167	112	74	107	275

Table 3 - Main Issues Raised and Council's Response

Notes:

- This provides a synopsis of the main issues raised through the representations and the Council's response to these. Its primary focus is therefore upon objections rather than statements of support.
- The grey shading in the column entitled 'New / Significant' denotes if the issue has not been explicitly raised before: either through the Core Strategy process or earlier consultation on the Site Allocations DPD.
- The 'S' in the 'New / Significant' column denotes if as well as a new issues, it is also considered to be a significant issue that has required particularly careful consideration.
- The reference in the 'Amendment Required' column relates to the Editorial (E), Minor Change (MC) or Significant Change (SC) shown in Table 4.

ISSUE: Chapter 1 - Introduction			
<div>Number of people/organisations responding4</div> <div><div>Supporting -</div><div><div>Key organisations2</div><div>Individuals1</div><div>Landowners0</div><div>Total3</div></div></div> <div><div>Objecting -</div><div><div>Key organisations0</div><div>Individuals0</div><div>Landowners1</div><div>Total1</div></div></div>			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			
Map 2 in the Written Statement (page 9) the East Hemel Hempstead Area Action Plan (EHH AAP) area should be shown as excluded as it is covered by the Site Allocations DPD.		No change . The East Hemel Hempstead Area Action Plan (EHH AAP) is not part of the Site Allocations DPD, as shown by Map 1 (page 2). However, it is agreed that the title of Map 2 could be clarified to read ‘Core Strategy extract: Key Diagram’	E
Organisations who agreed made the following comments:			
Support for the approach taken in relation to the publication and forthcoming examination of the Site Allocations, whilst undertaking work on the early partial review of the Core Strategy		No change as a result of the representation. Support noted and welcomed. However, minor changes required to the introductory text to update references to the Development Management DPD and to more explicitly refer to the role of the Early Partial Review process.	MC1 MC2
The need for the Council to continue to liaise under the duty to cooperate – specifically with regards to ‘update on progress for the		No change. The Council is aware of the obligations that the Duty to Cooperate places upon its activities and decisions and seeks to work with neighbouring authorities to address those issues identified. Technical work on the early partial	No

new Local Plan, Green Belt review, evidence base with regards to infrastructure needs, and opportunities for meeting the needs for traveller sites arising from adjoining authorities'		review which will result in the new single Local plan is being undertaken at present and will involve liaison with appropriate authorities. See the Duty to Cooperate Statement for more detail.	
Support for the proposed level of growth in relation to the supply of gas infrastructure. Noted recommendations on development management and specific site requirements for renewable technologies.		No change. Support noted and welcomed. Recommendations to be looked at in more detail during part on the early partial review of the Core Strategy (through the development of a new single Local Plan, as these relate to development management issues that are not covered by the Site Allocations DPD.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	
<i>Individuals who agreed made the following comments:</i>			
Support for Chapter 1 of the Written Statement		No change. Support noted and welcomed	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	
<i>Landowners who agreed made the following comments:</i>			
-		N/A	

ISSUE: Chapter 2 – (a) Green Belt			
Number of people/organisations responding 31			
Supporting -			
Key organisations	5		
Individuals	0		
Landowners	4		
Total	10		
Objecting -			
Key organisations	3		
Individuals	3		
Landowners	17		
Total	22		
<i>N.B Natural England have supported some policies/paragraphs and objected to others, so they are included in the tally once for each support and object</i>			
Issue / Summary of Concern	New /	Response	Amendment

	Significant?		required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
The environment section should be incorporated into Chapter 2 due to the number of important designations in the Borough.		No change. The structure of the Site Allocations DPD is based on the structure of the Core Strategy. The Sustainable Development Strategy covers the settlement hierarchy, urban and rural issues and transport. The order of the chapters does not correlate to any relative order of importance. , Chapters 8 and 9 -'Looking after the Environment' includes the natural and historic environment. This is supported by Background Issues Paper: Looking After the Environment. Key designations such as the Special Area of Conservation and Chilterns Area of Outstanding Natural Beauty (AONB) are also highlighted in the Key Diagram (Map 2) in the introductory section of the plan.	No
<p>The development of LA3 conflicts with the NPPF in the following respects:</p> <ul style="list-style-type: none"> • The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances. • The NPPF states that a constraint such as Green Belt may restrict the ability of an authority to meet its housing need. • The NPPF states that, in respect of decision making, unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt. 		<p>No change. The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area's objectively assessed need.</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy. A key role of the Site Allocations DPD is to take forward the strategic policies and targets relating to housing within the Core Strategy and ensure that these are delivered on the ground. It is the role of the early partial review (in the form of a new single Local Plan) to look again at longer term needs and take account of a whole range of Government policies and guidance, including those relating to the Green Belt.</p> <p>Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to “<i>significantly boost the housing supply</i>” (para. 47). In considering these points, Councils are expected to meet their “<i>objectively assessed needs</i>” for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.</p> <p>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making (planning application) rather than the plan-making process. The changes do not affect how we implement plans that are already adopted, such as the Core Strategy and associated proposals that it contains.</p> <p>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council progresses the Site Allocations DPD.</p>	No
Brownfield sites should be considered first and other sites of less value.		No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of 'brownfield' sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed	No

		<p>part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p>	
The justification for locating traveller sites in the Green Belt, where Green Belt boundaries should not be changed	S	<p>No change. 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, 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)</p> <p>Feedback on these potential sites was sought as part of Site Allocations consultation in 2008. 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: http://www.dacorum.gov.uk/docs/default-</p>	No

		<p>source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0</p> <p>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.</p> <p>The potential to extend the two existing Gypsy sites within the Borough has been considered and discussed with the Gypsy and Traveller Units 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. The Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the 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. The owner of the land adjacent to the site at Long Marston was approached formally in early 2015 regarding the potential for site expansion and was clear that this would not have their support as landowner.</p> <p>The Council's approach to locating Gypsy and Traveller sites as part of the three largest Local Allocations also means that (subject to modification SC7 being agreed) all three of the new sites would be located on land that has been removed from the Green Belt on adoption of the Site Allocations DPD.</p> <p>Other sites suggested through the Pre-Submission consultation and also submitted as having development potential through the 'call for sites' process' have also been considered and discounted as realistic or appropriate options. A fuller explanation is set out in the Homes and Community Services Background Issues Paper. The text of the September 2014 version of this document has been updated to elaborate on the explanation previously given, as a result of representations received. New sites suggested have also been appraised.</p> <p><i>See also response to Chapter 6: Housing.</i></p>	
Development of site LA3 will cause a serious drain on existing facilities and resources, with no planned compensatory provision. The design and layout of LA3 will create extensive traffic movements from west to east and there is no new transport infrastructure planned to alleviate its impact.		<p>No change. The responses to these issues are covered in the Local Allocation LA3 section.</p> <p><i>See also response to chapter 6: Housing and Local Allocation LA3.</i></p>	No
Whether the removal of the Green Belt from site GB/10 will adversely affect the setting of the Grade II registered Park of Tring Park (a heritage park and garden and designated heritage asset). If so, this would create a conflict with the NPPF paragraphs 169 and 170, chapters 12 and 9 as well as the PPG on housing and economic land availability which indicates that designated heritage assets should be considered.		<p>No change. The proposed change to the Green Belt boundary at GB/10 is intended to correct a minor anomaly and ensure a more permanent and defensible boundary to the Green Belt in this location. Although it is proposed that a small amount of land will be removed from the Green Belt, this is not to enable development of the land. Neither is this land being promoted for development. The change in designation of the land will not have a material impact on Tring Park. If a development proposal does come forward on the land, the impact on Tring Park will be a material consideration for the planning application.</p>	No
Whether the removal of the Green Belt from site GB/9 (LA5) will		<p>No change. The principle of removing land from the Green Belt (via the Local Allocations sites) was tested and established through the Core Strategy. The role of the Site Allocations is to take forward this approach and to make the</p>	No

adversely affect the setting of Tring Cemetery (designated as a Locally Registered Historic Park and Garden and on the Council's Local List). If so, this would create a conflict with the NPPF paragraphs 169 and 170, chapters 12 and 9 as well as the PPG on housing and economic land availability which indicates that designated heritage assets should be considered.		<p>actual changes to the Green Belt boundaries that will enable this development to go ahead.</p> <p>When drawing up the Core Strategy the Council had to ensure that it reflected guidance on the Green Belt and other matters set out in the National Planning Policy Framework (NPPF). This was tested as part of the Examination process and the plan found 'sound.'</p> <p>One of the key development principles in Policy LA5 is to 'protect the green and open setting of Tring Cemetery, which is a locally listed historic park or garden'. Further, more detailed, guidance is provided in paragraph 5.46 of the draft LA5 Masterplan.</p> <p>The future planning applications(s) will be considered against Policy CS27: Quality of the Historic Environment.</p> <p>Note: Whilst no change is proposed as a result of this issue, a change is proposed to the extent of the land at LA5 to be removed from the Green belt – see section on Local Allocation LA5 and SC7.</p>	
<p>Whether the MDS requirements should help to mitigate any potential adverse effects by protecting open and semi-rural character and maintaining open land. Whether the planning requirements of the MDS's should include:</p> <ul style="list-style-type: none"> giving great weight to conserving the landscape, scenic beauty and wildlife of the AONB; a Landscape and Visual Impact Assessment; and consultation with the Chilterns Conservation Board. 		<p>No change. Agree in principle with comments, however, the requirements are covered elsewhere by other policies. The Site Allocations and Core Strategy policies should be read together as a whole, not read in isolation. Of particular relevance are Core Strategy Policies CS24: The Chilterns Area of Outstanding Natural Beauty, CS25: Landscape Character and CS26: Green Infrastructure, and saved Local Plan Policy 97: the Chilterns Area of Outstanding Natural Beauty. Furthermore, the Chilterns Conservation Board are consulted on relevant planning applications and their views are taken into account as part of the decision making process.</p> <p>Landscape and visual impact assessments (LVIAs) are required from developers where development is of a large scale or within a potentially sensitive landscape.</p>	No
<i>Organisations who agreed made the following comments:</i>			
Support for MDS1, MDS2 and MDS3 which are all in Berkhamsted from Berkhamsted Town Council.		No change. Support noted.	No
Support for the Strategic Objectives for the Sustainable Development Strategy, but suggestion that protection and enhancement of the natural environment, including designated sites and landscapes, should be added.		No change. The Strategic Objectives are carried through from the Core Strategy where they have been set to meet the borough vision. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy, as such it should not change any of the strategic objectives. It should be noted that one of the Strategic Objectives for the Looking after the Environment chapter is 'to protect and enhance Dacorum's distinctive landscape character, open spaces, biological and geological diversity and historic environment'.	No
Whether the plan should require relevant proposals within the Chilterns AONB setting to demonstrate no adverse effect on the AONB and its setting.		No change. This is covered by Policy CS24 of the Core Strategy which states that 'the special qualities of the Chilterns AONB will be conserved' and which requires development to take account of the policies and actions set out in the Chilterns Conservation Board's Management Plan (formally endorsed by the Council) and support the principles set out within the Chilterns Buildings Design Guide. Saved Local Plan Policy 97: Chilterns Area of Outstanding Natural Beauty states that within the AONB <i>'the prime planning consideration will be the conservation of the beauty of the area...Any development proposal which would seriously detract from this will be refused'</i> .	No
Support for Major Developed Sites, for the recognition of historic assets and for the protection of education facilities		No change. Support noted and welcomed.	No
Support for the allocation of Ashlyns and Kings Langley Schools as MDSs in the Green Belt which will help facilitate and guide the expansion of secondary school provision		<p>Change required. Support noted and welcomed.</p> <p>The Council now has clarification of the proposed redevelopment of Kings Langley School via the planning permission granted in October 2014. A consequential change is the addition of an appropriate infill area to be shown in Appendix 3</p>	<p>SC3</p> <p>MC70</p>

		of the Site Allocations document.	
Support for Green Belt alteration GB/19 (Land at Frithsden Beeches, Berkhamsted Common)		No change. Support noted and welcomed.	No
Support for the omission of sites from previous consultations which would have had a negative impact on biodiversity and the Chilterns AONB		No change. Support noted and welcomed.	No
A map showing all the site allocations in the Borough would be helpful.		No change. A full Policies Map will be produced on adoption of the Site Allocations DPD as set out in paragraphs 1.11 and 1.12 of the Site Allocations Written Statement (Pre-Submission, September 2014).	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Whether any development in the Green Belt is inappropriate, with reference to recent Ministerial Statements on the Green Belt. These statements assert that once established, Green Belt boundaries should only be altered in exceptional circumstances.	S	<p>No change. The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area's objectively assessed need.</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy. A key role of the Site Allocations DPD is to take forward the strategic policies and targets relating to housing within the Core Strategy and ensure that these are delivered on the ground. It is the role of the early partial review (in the form of a new single Local Plan) to look again at longer term needs and take account of a whole range of Government policies and guidance, including those relating to the Green Belt.</p> <p>Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to “<i>significantly boost the housing supply</i>” (para. 47). In considering these points, Councils are expected to meet their “<i>objectively assessed needs</i>” for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.</p> <p>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making (planning application) rather than the plan-making process. The changes do not affect how we implement plans that are already adopted, such as our Core Strategy and associated proposals that it contains.</p> <p>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council progresses the Site Allocations DPD.</p>	No
There are sufficient non-Green Belt sites to accommodate the required level of development.		No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of 'brownfield' sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed	No

		<p>part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p>	
Individuals who agreed made the following comments:			
-		N/A	No
Landowners			
Landowners who disagreed made the following comments:			

A number of landowners used their response to chapter 2 to promote sites for development. The sites are listed in a separate section at the end of this table.		See responses to individual sites.	No
The policy approach to allocating MDS's is inconsistent with national policy which does not use the terminology MDS. Instead para 89 of the National Planning Policy Framework (NPPF) refers to 'previously developed sites' as appropriate for limited infilling and partial or complete redevelopment. The allocation of MDS's creates a two-tier policy approach to previously developed sites with no consideration given to additional sites since the Core Strategy. A more effective approach would be comprehensive review of all previously developed sites in the Green Belt culminating in a justified list of sites to ensure maximum flexibility in future use and potential for future sustainable development.		No change. The approach to include Major Developed Sites (MDS) was carried through from the Local Plan 2004, and re-established in the Core Strategy 2013 where the delivery section following Policy CS5 identifies that the Site Allocations DPD will be used to identify and define the MDSs. The designation is used to assist established employment sites and institutions in the Green Belt to provide essential facilities; to protect historic assets; and manage potential development. The Core Strategy was subject to examination by the Planning Inspectorate and found to be sound and NPPF compliant. The NPPF is only a framework and does not preclude the use of local MDS designations where appropriate. The role of the Site Allocations is to deliver the policies and objectives set out in the Core Strategy, not to alter the approach. The appropriateness of continuing with the MDS approach will be reviewed as part of the new single Local Plan.	No
Whether the assessment of sites for allocation as Major Developed Sites (MDS) in Green Belt is robust as there are sites which meet the criteria in para 8.31 of the Core Strategy that are not allocated. In particular the site of the Bobsleigh Hotel meets the criteria; it is of a substantial size, contains a significant amount of built development and can accommodate further development without prejudicing Green Belt objectives. Furthermore, it is available for development.		No change. There are lots of developed sites in the Green Belt which are not designated as MDS's. The MDS approach has been applied sensibly and logically. In addition to meeting the criteria set out in para 8.31 of the Core Strategy, redevelopment or infilling of MDSs should also help to secure economic prosperity or achieve social objectives or environmental improvements. The Council do not consider that strong justification has been provided for designating the Bobsleigh Hotel as a MDS; the Bobsleigh is not a particularly significant site locally, nor is it of a particularly large scale. The future expansion or redevelopment of the existing hotel can also take place in accordance with existing Green Belt policy.	No
Request that Abbot's Hill School is added to the list of Major Developed Sites (in the Green Belt). The justification for designating it is that it has similar characteristics to other MDS's. It is a school, as are 2 of other MDS's, and therefore infilling would fulfil the 'social objective' identified in the Core Strategy para 8.31. The developed area is a similar size (3ha) to that of the other 2 schools that are designated as MDS's. Part of the site abuts the built up area of Hemel Hempstead. Designation as MDS would provide greater certainty to the school in making investment decisions, and it could simplify the process of applying for planning permission.	S	Change required. The site is reassessed for suitability through the update to the Sustainable Development Strategy Background Issues Paper and it is proposed to designate the school site as a MDS in the Green Belt for consistency with the designation for other schools located in the Green Belt. This is consistent with the approach set out in paragraph 8.31 of the Core Strategy, as limited infilling may help to secure social objectives through provision of education, and it is considered that the site fulfils the criterion for MDSs set out in para 8.31. There is a strong presence of private sector schools in Dacorum, which play an important role in providing independent school places as recognised in para 15.11 of the Core Strategy and designation of the site will give some flexibility for development for education facilities in the Green Belt as set out in Policy CS23: Social Infrastructure. The principles of development will refer to the proposed designation of the wider park as a Locally Registered Park of Garden of Historic Interest and the need to consider the potential for the dual use of new and existing facilities as set out in policy CS23: Social Infrastructure.	SC2
While the Site Allocations DPD is consistent with the policies of the Core Strategy as the council has acknowledged that plan does not meet the Full Objectively Assessed Need and is to be subject of an early partial review. The Site Allocations DPD should, similarly, make reference to an early review for consistency and to ensure that sufficient land is brought forward in a timely manner to maintain the momentum of development and meet the longer term housing needs of the borough.	S	Change required. The commitment to undertake an early partial review of the Core Strategy to reconsider housing need and ways of meeting that need more fully is set out in the Core Strategy at paragraphs 29.7 – 29.10. Whilst the Site Allocations does not need to repeat this commitment, it is agreed that it is appropriate to add reference to the review in Part A – The Context.	MC2
The Site Allocations DPD should commit to annual monitoring and adopt a positive and pro-active strategy towards consideration and identification of other sites that might be allocated and brought forward		No change. Chapter 18 of the Core Strategy includes an extensive monitoring framework and delivery strategy and the Site Allocations document will be assessed against these indicators and targets. The Council undertakes annual monitoring through the Annual Monitoring Report(AMR) (and associated housing and employment Land Position	No

for development immediately upon completion of the partial review of the plan.		Statements) and keeps the 5 year housing land supply under regular review. Paragraph 18.6 of the Core Strategy sets out steps that will be taken if sites are not progressing as expected.	
The Site Allocations document should make reference to the importance of ensuring the appropriate distribution of housing to the market towns to maintain their vitality and viability. This is important in order to ensure that the market towns fulfil their long term function as key settlements serving a wider rural hinterland.		No change. Paragraph 2.1 of the Site Allocations Pre-Submission document states that the Core Strategy establishes the approach to the broad scale and distribution of development and that the main role and function of different areas is set out through the settlement hierarchy (Table 1 of the Core Strategy). The settlement hierarchy recognises the role the market towns play in meeting needs of, and providing services for their residents and adjacent rural communities. Policy CS1 of the Core Strategy pertains to the distribution of development in the borough and states that ‘... <i>market towns...will accommodate new development...provided that it...helps maintain the vitality and viability of the settlement...</i> ’. The role of the Site Allocations is to take forward the approach set out in the Core Strategy, and there is no need to repeat the approach in the Site Allocations DPD.	No
The Site Allocations document should allocate potential development sites for development following the partial review of the Core Strategy.		<p>No change. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan. This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council). These decisions clarify a number of key points, including:</p> <ul style="list-style-type: none"> • A ‘Local Plan’ can comprise a series of DPDs. Dacorum’s Site Allocations DPD is in-effect a ‘daughter document’ to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out; • Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area. • The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be. • That in Dacorum’s case, housing delivery is only expected to fall short of delivering full OAN in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets. <p>In the light of these decisions the approach taken by the Council to the Site Allocations DPD is considered to be both appropriate and legally compliant.</p> <p>This is reinforced by the fact that Dacorum’s own Core Strategy Inspector was happy with the wording in paragraph 29.8 (introduced via a post Examination main modification) <i>that “The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs. Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully.”</i></p>	No
The housing sites identified for Tring are not sufficient to meet the 480 dwelling target set out in the Core Strategy. There are limited opportunities for windfall development in the town due to the tight urban grain.		<p>No change. The Council acknowledges that the opportunities for windfalls are more limited in Tring than in the two larger towns, but given the contributions from completions since 2006, current commitments, LA5 and other allocations, the indicative housing supply for the town is not reliant on windfall development. The target for the town set out in the Core Strategy (Tring Place Strategy) is indicative only and is not to be treated as an absolute (paragraph 19.6 of the Core Strategy). However, given completions since 2006, current commitments and allocations, and future windfall, the Council is confident that this broad level of housing can be achieved over the lifetime of the plan. There is also a sufficient supply of land to provide for a good mix of type and tenure of housing in the town.</p> <p>The Site Allocations must have regards to the planning framework and strategic objectives set out in the Core Strategy. This approach to housing and the Green Belt was accepted by the Planning Inspector in finding the plan sound (subject to an early partial review). The Inspector was also content with the timing of the review. The Council is satisfied that the housing target can be met through the housing programme and, given future supply in the town and across the borough, further Green Belt releases are not justified at this time. The role of the Site Allocations is to deliver the housing requirements set out in Policy CS17 and not to revisit the Green Belt. The future level of housing and the role</p>	No

		of the Green Belt in accommodating this, will be dealt with comprehensively through progressing the single Local Plan (incorporating an early partial review of the Core Strategy).	
The housing sites identified for Berkhamsted are not sufficient to meet the 1,180 dwelling target set out in the Core Strategy. There is an unrealistic reliance on windfall development in the town.		No change. This issue is addressed in the table of responses to issues raised to Chapter 6 – Housing.	No
The scale of housing development proposed for Tring will fail to deliver the vision and objectives for the Town set out in the Core Strategy. The level of housing will fail to support natural growth of the population of Tring. Having only one site allocation for significant scale residential development in Tring will mean that the type, size and price of new units will be controlled by one party only. The Site Allocations document does not allocate land for a detached playing field to serve the needs of Tring Secondary School which the Core Strategy states it will do.		<p>No change. The decisions made regarding the level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The vision and objectives for the town are set out in the Core Strategy. There is also not just one site allocation for Tring. Whilst there is just the one Green belt release (Local Allocation), a number of other site allocations designations apply to the town.</p> <p>The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p> <p>As set out in the responses to issues raised to Chapter 7 – Meeting Community Needs a modification is required to the Site Allocations DPD to identify the location of detached playing fields in the event that an expansion to Tring Secondary School requires their provision.</p>	No
The Site Allocations document should allocate more sites for housing to meet the full housing need and through an appropriate distribution of housing to ensure both borough wide and local needs are met at the smaller settlements.		No change. This issue is addressed in the table of responses to issues raised to Chapter 6 – Housing.	No
The Site Allocations document should consider allocating housing sites capable of accommodating fewer than 10 units. There is no justification for this arbitrary threshold.		No change. It is not necessary for the Site Allocations to identify all potential allocations. It is reasonable for the document to focus on larger, key sites that will ultimately make a greater overall contribution to future housing supply. The Site Allocations will be clearer and easier to understand and manage if it focuses on larger allocations. The absence of any allocation would not prevent a site coming forward, be it greater or fewer than 10 units. The role of smaller sites is acknowledged through windfall contributions in the housing supply and via the Council's regular monitoring routines and is therefore fully reflected in the housing programme (see Table 3 in the Housing Chapter).	No
The Site Allocations is unsound because the Statement of Community Involvement (SCI) has not been fully complied with as aspects of previous representations have not been fully considered. As a result the extent of the boundary of the Wigginton 'Small Village in the Green Belt' has not been altered as it should have been.		<p>No change. The Statement of Community Involvement (SCI) is the Council's statement of policy on public consultation for planning documents (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has complied with the SCI in preparation of the Site Allocations document and associated master plans.</p> <p>A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council's website and their content has been reported to Members at the appropriate time.</p> <p>It should be noted that the Council intends to review and update its SCI prior to beginning consultation on its new single Local Plan.</p> <p>The issue of the village boundary for Wigginton is addressed in the response to individual sites set out at the end of this table.</p>	No
Green Belt sites should be allocated to meet the objectively assessed housing need.		No change. The Core Strategy considered the need for changes to be made to the Green Belt to accommodate new development and resulted in the designation of six Local Allocations. The Site Allocations formally removes these sites from the Green belt through changes to the Policies map. Paragraph 8.29 of the Core Strategy clearly states that <i>"The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change 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-</i>	No

		<p><i>evaluate the role and function of the Green belt when it reviews the Core Strategy (see paragraphs 29.8 to 29.10)."</i></p> <p>This is reflected in the text of Policy CS5: Green Belt which states that <i>"There will be no general review of the Green belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted."</i> This approach was accepted by the Core Strategy Inspector and is reflected in the Site Allocations DPD.</p> <p>A full review of the Green Belt is being carried out to inform the early partial review of the Core Strategy, through the production of a new single Local Plan. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan.</p>	
The supply of housing sites identified in the plan will not meet the requirement set out in para 47 of the NPPF, i.e. to identify a supply of specific, developable sites or broad locations for growth for years 6-10 and where possible, years 11-15.		No change. This issue is addressed in the table of responses to issues raised to Chapter 6 – Housing.	No
The Site Allocations document has not taken into account the Green Belt Review Stage 1		<p>No change. The Stage 1 Green Belt Review forms part of a range of technical work that will inform the early partial review of the Core Strategy (and help draw up a new single Local Plan for the Borough). The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan. This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council). These decisions clarify a number of key points, including:</p> <ul style="list-style-type: none"> • A 'Local Plan' can comprise a series of DPDs. Dacorum's Site Allocations DPD is in-effect a 'daughter document' to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out; • Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area. • The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be. • That in Dacorum's case, housing delivery is only expected to fall short of delivering full OAN in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets. <p>In the light of these decisions the approach taken by the Council to the Site Allocations DPD is considered to be both appropriate and legally compliant.</p> <p>This is reinforced by the fact that Dacorum's own Core Strategy Inspector was happy with the wording in paragraph 29.8 (introduced via a post Examination main modification) <i>that "The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs. Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully."</i></p>	No
Site Allocations document should be based on objectively assessed need from an up to date Strategic Housing Market Assessment (SHMA) and Stage 2 Green Belt review, meaning that the Site Allocations is based on out of date information		<p>No change. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan. This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council). These decisions clarify a number of key points, including:</p> <ul style="list-style-type: none"> • A 'Local Plan' can comprise a series of DPDs. Dacorum's Site Allocations DPD is in-effect a 'daughter document' to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out; • Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area. 	No

		<ul style="list-style-type: none"> The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be. That in Dacorum's case, housing delivery is only expected to fall short of delivering full OAN in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets. <p>In the light of these decisions the approach taken by the Council to the Site Allocations DPD is considered to be both appropriate and legally compliant.</p> <p>This is reinforced by the fact that Dacorum's own Core Strategy Inspector was happy with the wording in paragraph 29.8 (introduced via a post Examination main modification) <i>that "The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs. Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully."</i></p>	
Green Belt sites should be allocated where they are not considered to contribute to the purposes of the Green Belt		No change. The purpose of the Site Allocations DPD is to meet the requirements of the Core Strategy, in particular define the boundaries of identified Green Belt housing sites, known as Local Allocations. Minor amendments to the Green Belt were identified in the Site Allocations, but not with the intention of enabling further development in the Green Belt. This is clearly set out in paragraph 8.29 of the Core Strategy. The Green Belt Review Stage 2 will look in more detail at individual sites contribution to the purposes of the Green Belt. This technical work will inform the new single Local Plan, and therefore not the subject of this document.	No
The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, and these have not been demonstrated.		<p>No change. The principle of removing land from the Green Belt (via the Local Allocations sites) was tested and established through the Core Strategy. The role of the Site Allocations is to take forward this approach and to make the actual changes to the Green Belt boundaries that will enable this development to go ahead.</p> <p>When drawing up the Core Strategy the Council had to ensure that it reflected guidance on the Green Belt and other matters set out in the National Planning Policy Framework (NPPF). This was tested as part of the Examination process and the plan found 'sound.'</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Council's review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy and continues to do through its Site Allocations document.</p> <p>The Local Allocations identified within the Core Strategy remain the only housing sites identified for release from the Green Belt.</p>	No
There are brownfield sites which have not been allocated for housing that are sequentially preferable to the allocated Green Belt sites.		No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of 'brownfield' sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the	No

		<p>amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p>	
The assessment of minor anomalies is not consistent with national policy or justified and therefore thought to be unsound.		<p>No change. The principle of correcting minor anomalies to the Green Belt boundary through the Site Allocations DPD was established in the Core Strategy (paragraph 8.29) and was accepted by the Planning Inspectorate as a sound approach. Through Policy CS5 the Core Strategy states that '<i>There will be no general review of the Green Belt boundary through the Site Allocations DPD</i>'. The Core Strategy also commits to a comprehensive review of the Green Belt (para 29.10) which will be undertaken as part of the evidence base to inform the new Single Local Plan. The purpose of the Site Allocations document is to deliver the policies and objectives of the Core Strategy.</p> <p>All minor amendments proposed to the Green Belt boundary, Major Developed Sites and amendments to Village envelopes are justified in the Background Issues Paper: The Sustainable Development Strategy. Proposed sites arising from the Pre-Submission consultation are assessed / reassessed where appropriate. It is appropriate to use the Site Allocations document to amend boundaries in light of improved mapping accuracy and to ensure these maps continue to sensibly reflect circumstances on the ground.</p>	No

There are other more suitable sites in Bovingdon for Green Belt release to enable housing development compared to the proposed LA6 site		<p>No change.</p> <p>The Core Strategy examination process included consideration of additional and/or alternative Green Belt housing sites to the six Local Allocations put forward by the Council. The reasons for these choices were set out in background technical work submitted at the examination. The Core Strategy Inspector was satisfied however with the choice of sites made and their ability to provide new homes (subject to the need for an early review of both the Green Belt and housing numbers). The role of the Site Allocations is to formally remove these sites from the Green Belt through changes to the Policies Map. Paragraph 8.29 of the Core Strategy clearly states that <i>“The Council’s own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change will be necessary in the Site Allocations DOPD, 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).”</i> This is reflected in the text of Policy CS5: Green Belt which states that <i>“There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted.”</i> This approach was accepted by the Core Strategy Inspector and is reflected in the Site Allocations DPD.</p> <p>A full review of the Green Belt is being carried out to inform the early partial review of the Core Strategy, through the production of a new single Local Plan. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan.</p>	No
The rationale for the altering of the MDS and Employment Area in the Green Belt boundary for Bourne End Mills is not clear, other than to be consistent with the planning application		<p>Change required. The Council accepts the argument that the boundary of the MDS should be extended to include the former area of open storage in the south western part of the site to give policy support to environmental improvements over the whole site. However, as this part of the site is to remain open, an infill will be added to exclude this area and protect its open nature. See also response to issues raised regarding Chapter 4 – Economic Development.</p>	SC4 MC71
<i>Landowners who agreed made the following comments:</i>			
Support the proposed amendment to the Green Belt boundary at site GB/9 to enable development of LA5 prior to 2021. The earlier release of site LA5 will play an important role in delivering much need local infrastructure and family and affordable housing in Tring. It will also support the maintenance of a five year housing land supply.		No change. Support noted and welcomed.	No
Support for the removal of the site from the Green Belt at GB/9 for land to the west of Tring		No change. Support noted and welcomed.	No
Support for village boundary amendment VB/1		No change. Support noted and welcomed.	No
<i>Other comments from Landowners:</i>			
-		N/A	No
Other new sites and/or designations			
<i>Proposed changes to Green Belt boundary to correct anomalies</i>			
<ul style="list-style-type: none"> Land R/O 13-17 Oakwood, Berkhamsted. The assessment of anomalies to the Green Belt boundaries is inconsistent in that twice the boundary is changed (GB/14 and GB/17) from running through residential gardens to become consistent with the curtilage boundaries. The Green Belt boundary runs 		<p>No change. This boundary change is considered by The Sustainable Development Strategy Background Issues Paper (paragraph 1.54). The property boundaries changed following construction of the A41 in 1992. Long gardens and reasonably dense belt of vegetation continue to contribute significantly to the rural setting and fulfil a valid Green Belt purpose. The fact that a Green Belt boundary goes through a large garden does not always equate with it being an</p>	No

through residential gardens at 13-17 Oak Wood, Berkhamsted, and is not amended to become consistent with residential curtilages.		anomaly: it is often an intentional decision. In this instance the Green Belt boundary follows the line of dense vegetation, with the exception of one residential garden where the vegetation has been removed. This area of Green Belt will be reviewed by the Green Belt Stage 2 Study to inform the Single Local Plan as part of larger parcel of land which was identified as an area performing least well against the Green Belt purposes in the Green Belt Stage 1 study. The Council feels that a more comprehensive rather than piece-meal approach that considers this relatively small area as part of the aforementioned larger parcel, is a more logical way to assess such a change.	
<i>Proposed changes to the boundaries of small villages washed over by Green Belt or Rural Area.</i>			
<ul style="list-style-type: none"> Land at the The New Bungalow and Craig Rowan, Chipperfield. Reassess village envelope 		No change. The buildings and small parts of the gardens at this site have been included in the village envelope at map VB/1 as discussed in the Sustainable Development Strategy Background Issues Paper (para 2.10 and Table 1). The majority of the rear gardens of the dwellings are not included within the proposed change to the village boundary, which is consistent to other scenarios in the Borough. The exclusion of the whole garden does not prevent the erection of a fence enclosing the whole of the garden which may help alleviate problems with machinery for the Garden nursery raised in the response.	No
<ul style="list-style-type: none"> Hunters Quay, Wigginton. Reassess village envelope 		No change. The proposed change to the village envelope were considered through the Sustainable Development Strategy Background Issues Paper (Table 1). The council's conclusions that ' <i>The site is rural in character</i> ' and ' <i>Boundaries would not be defensible</i> ' remain valid. There are a number of instances where village envelope boundaries go through residential gardens. Whilst this may appear erroneous, it is intentional, as where residential gardens are relatively large, it is important to protect their openness.	No
<ul style="list-style-type: none"> The Old Cowhouse, The Mill, Wilstone. Reassess village envelope 		No change. The existing boundary follows the line of a road, which is a more logical and defensible boundary than following the curtilage of the dwelling.	
<i>Proposed changes to Green Belt boundary to promote sites for development on 1-10 dwellings</i>		<p>In relation to all sites in this section:</p> <p>It is not necessary for the Site Allocations to identify all potential allocations. It is reasonable for the document to focus on larger, key sites that will ultimately make a greater overall contribution to future housing supply. The Site Allocations will be clearer and easier to understand and manage if it focuses on larger allocations. The absence of any allocation would not prevent a site coming forward. The role of smaller sites is acknowledged through windfall contributions in the housing supply and via the Council's regular monitoring routines.</p> <p>Planning applications for developments of this size in the GB will be dealt with on a site by site basis by Development Management and assessed against Policies in the CS including Policy CS5: Green Belt.</p>	No
<ul style="list-style-type: none"> Land south of Ashlyns School (part of the wider GUI land holdings). Promotion of site for 5-8 units. Pre-app advice has been sought for residential development of this site with a positive outcome. 		No change. See above	No
<ul style="list-style-type: none"> Castle Gateway, Berkhamsted. Promotion of site for a single Eco-home 		<p>No change. Proposals for eco-homes are not expressly identified in the Site Allocations DPD as all development should meet certain sustainability criteria (Core Strategy Policies CS28 and CS29). While the principle of sustainable development is encouraged, this in isolation is not a justification for an allocation in the Green Belt. Such homes can still have an impact on the openness of the Green Belt and character of the countryside.</p> <p>Planning applications for single units in the GB will be dealt with on a site by site basis by Development Management and assessed against Policies in the CS including Policy CS5: Green Belt. See also comments on smaller sites above.</p>	No

<ul style="list-style-type: none"> Chilterns Jaguar Garage, Bovingdon. The owners of the business wish to relocate to expand their business, and consider the site's redevelopment opportunities would be enhanced if it was not designated as Green Belt. 		<p>No change. The site's location in the Green Belt would not necessarily preclude reasonable opportunities for redevelopment. National and local policies would allow for development on previously developed land in the Green Belt, subject to its impact on the openness of the Green Belt.</p> <p>Planning applications for developments of this size in the GB will be dealt with on a site by site basis by Development Management and assessed against Policies in the CS including Policy CS5: Green Belt.</p>	No
<ul style="list-style-type: none"> Land at Love Lane, Kings Langley. Promoted for 4-8 dwellings. 		<p>No change. The site was discussed at the Core Strategy examination, where the Inspector deferred it to the Site Allocations due to its relatively small scale, however, the site is considered to be of too large a scale to be removed from the Green Belt as an anomaly.</p> <p>The Core Strategy considered the need for changes to be made to the Green Belt to accommodate new development and resulted in the designation of six Local Allocations. The Site Allocations formally removes these sites from the Green belt through changes to the Policies map. Paragraph 8.29 of the Core Strategy clearly states that <i>"The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change 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)."</i> This is reflected in the text of Policy CS5: Green Belt which states that <i>"There will be no general review of the Green belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted."</i> This approach was accepted by the Core Strategy Inspector and is reflected in the Site Allocations DPD.</p> <p>A full review of the Green Belt is being carried out to inform the early partial review of the Core Strategy, through the production of a new single Local Plan. This site will be evaluated, possibly as part of a larger parcel of land, for its contribution to the Green Belt in the Green Belt Stage 2 Study, whose conclusions will inform the single Local Plan.</p> <p>Planning applications for developments of this size in the GB will be dealt with on a site by site basis by Development Management and assessed against Policies in the Core Strategy including Policy CS5: Green Belt.</p>	No
Proposed changes to Green Belt boundary to promotes sites for development for more than 10 dwellings			
<ul style="list-style-type: none"> Blegberry Gardens, Berkhamsted. The site is 3.5ha and is promoted for residential development. 		<p>No change. These sites were all considered through the Core Strategy as alternative locations for Local Allocations, and were not taken forward. The sites were considered in the Assessment of Local Allocations and Strategic Sites (2010) and have also been assessed at various stages of the preparation of the Site Allocations DPD through the Schedule of Site Appraisals documents.</p>	No
<ul style="list-style-type: none"> Land at Rose Cottage, 17 Bank Mill Lane, Berkhamsted. Promoted for development of 16 dwellings. 		<p>The Core Strategy considered the need for changes to be made to the Green Belt to accommodate new development and resulted in the designation of six Local Allocations. The Site Allocations formally removes these sites from the Green Belt through changes to the Policies map. Paragraph 8.29 of the Core Strategy clearly states that <i>"The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change 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)."</i> This is reflected in the text of Policy CS5: Green Belt which states that <i>"There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted."</i> This approach was accepted by the Core Strategy Inspector and is reflected in the Site Allocations DPD.</p> <p>A full review of the Green Belt is being carried out to inform the early partial review of the Core Strategy, through the</p>	No
<ul style="list-style-type: none"> Ivy House Lane, Berkhamsted. The site is 4.8ha and is promoted for residential development. 			No
<ul style="list-style-type: none"> Land to the rear of Green Lane/Homefield, Bovingdon. The site is promoted for residential development of 130-175 dwellings. 			No

<ul style="list-style-type: none"> Land between Marshcroft Land and Station Road, Tring. The site is 52ha and is promoted for residential use and a detached playing field to serve Tring School. 		production of a new single Local Plan. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan.	No
<ul style="list-style-type: none"> Land at Waterside, Tring. Large site promoted for residential development and additional football pitch provision. 			No
Sites in the Rural Area promoted for development			
<ul style="list-style-type: none"> Land adjoining Dixons Wharf, Wilstone. Site in the Rural Area promoted for 40 dwellings and associated local services. 		<p>No change. The site was assessed in the Supplementary Schedule of Site Appraisals (September 2014) to the Site Allocations DPD as a potential housing site but not taken forward as an allocation. It was considered to be a greenfield site with a poor relationship to the nearby village of Wilstone and other local services and facilities. Recent development on the adjoining land was not seen as justification for housing on this site.</p> <p>The Council acknowledges that the site was incorrectly identified as 'Green Belt' in the 'Type of site' box, however, it is clear from the description in the 'Key land issues raised' box that the assessment is was correctly based on the site being within the Rural Area. The identification of the site as Green Belt was therefore clearly a typographical error rather than a fundamental error in the assessment of the site. The Council acknowledges that there is a disagreement over whether the site should be considered to be 'previously developed', however, the Council maintains its position that the site should be considered a greenfield site, not previously developed due to the extensive vegetation cover, the limited presence of any built development, and the long term absence of an active use on the site. The assessment of the site in the Supplementary Schedule of Site Appraisals (September 2014) is considered to remain valid and the Council's conclusions remain.</p> <p>Should a planning application be made it would be considered against Policy CS7: Rural Area.</p>	No
Sites in the-Open Land designation promoted for development			
<ul style="list-style-type: none"> St Mary's Convent, Green End Road, Boxmoor. The site is currently constrained by an Open Land designation. Promoted for housing as an alternative to the release of Green Belt sites. 		<p>No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of 'brownfield' sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a</p>	No

		<p>further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p> <p>For response to the issue of Open Land designation, see the Council's response to issues raised regarding Meeting Community Needs (Chapter 7, where this site is explicitly considered). Given the sensitivities of the site, the Council feels the site can be better dealt with through the Development Management process and it is noted that the site is currently being progressed through this route. In any event, a specific housing allocation is not required in order to bring appropriate sites forward for development.</p>	
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ISSUE: Chapter 2 – (b) Mixed Use			
Number of people/organisations responding		7	
Supporting -			
Key organisations	2		
Individuals	0		
Landowners	0		
Total	2		
Objecting -			

Key organisations	4		
Individuals	1		
Landowners	0		
Total	5		
Issue / Summary of Concern	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
Whether the development at LA3 is in conflict with the National Planning Policy (NPPF).		No change. This section of the Site Allocations document deals with specified Mixed Use proposals. LA3 is not identified as such. This issue is dealt with in responses to Local Allocation LA3 under the Providing Homes and Community Services chapter.	No
Proposal MU/1: English Heritage wants the planning requirements to refer to the retention and reinforcement of trees along Queensway and to clarify the height of replacement buildings.		No change. The Council does not want to be too prescriptive over design in order not to inhibit innovation, but it accepts that it is appropriate to retain and reinforce trees along Queensway and that the location is sensitive to heights of new buildings. The latter would be tempered by local character and the site's proximity to the Old Town Conservation Area. The land is subject to changes in level which could help it better accommodate taller elements. Both issues are already effectively covered in existing design guidance provided by the Hemel Hempstead Town Centre Master Plan and Gade Zone Planning Statement referred to in the planning requirements.	No
Sports England support Proposal MU/5 in meeting the local need for new sporting facilities and in proposing a master planning approach to the site.		Change required. Support noted and welcomed. Consequential changes required to MU/5 following linked comments from Sports England on H/8. These seek to reinforce the need to link the proposals in order to ensure a quality development and timely delivery of the new facilities.	MC8
Whether the housing capacity for MU/6 is too high and should be reduced to 140 to reflect the planning application on part of the site.		No change. The capacity is indicative only and simply seeks to guide the broad scale of the proposal and ensure continuing effective use of the site. It will help reduce pressure for further Green Belt sites, boost housing supply in the town, and assist with delivering the borough's housing requirements. The capacity has been reduced over the position in the Core Strategy (from 180 homes) and reflects informal discussions over its development potential with the developer. Despite the existing covenant, it has always been envisaged that the northern parcel would be slightly denser than the southern parcel (the subject of the current application). Even if the specific capacity was reduced, historically a number of housing proposals have delivered over the indicative net capacity. Given these factors, the capacity is considered reasonable.	No
<i>Organisations who agreed made the following comments:</i>			
Whether sufficient weight has been given to the fact that all the Mixed Use Development allocations are within the setting of the Chilterns AONB. This would require a Landscape and Visual Impact Assessment (LVIA) to be carried out for any proposals and the need to consult the Chilterns Conservation Board.		No change. It is accepted that many of the settlements in the borough are within the broader setting of the Chilterns Area of Outstanding Natural Beauty (AONB). However, most of the Mixed Use allocations are within an urban or edge of urban setting and are unlikely to have any material impact on the AONB. Those allocations on the edge of the settlements are also at a distance from the boundary of AONB and the Council is generally applying control over the heights of buildings / form of development to further minimise their impact on the wider countryside. All applications on these sites would need to comply with all relevant policies of the development plan: including Policies CS24 – The Chilterns Area of Outstanding Natural Beauty and CS25: Landscape Character. The Chilterns Conservation Board would be consulted as a matter of course on applications considered to impact on the AONB, and Landscape and Visual Impact Assessments (LVIAs) would be required as part of the planning application process if considered necessary.	No
Thames Water is concerned over the current capacity of the waste water network to support MU/1. There is a need for a Drainage Strategy and potentially new and upgraded drainage infrastructure.	S	Change required. With regards to the level of development sought, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific amendments to the text of the Site Allocations document with regard to the Local Allocations.	MC3

		<p>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers of some larger schemes at the planning application stage. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. Therefore, it is considered appropriate to add a short reference to the planning requirements to refer to the need for liaison with Thames Water and the potential requirement for specific technical work to be carried out to assess capacity issues. This will allow flexibility at the pre-application stage should any more specific upgrade requirements be identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues.</p> <p>See also Chapter 18: Monitoring and Review for other related changes.</p>	
Thames Water is concerned over the current capacity of the waste water network to support MU/2. There is a need for a Drainage Strategy and potentially new and upgraded drainage infrastructure.	S	Change required. See response to this matter under MU/1 above. Consequential changes are required to include additional land within the boundary to MU/2 following amendments to the boundary to Proposal H/8. See response to H/8 in the Housing Chapter.	MC4 MC5
Thames Water is concerned over the current capacity of the waste water network to support MU/3 There is a need for a Drainage Strategy and potentially new and upgraded drainage infrastructure.	S	Change required. See response to this matter under MU/1 above.	MC6
Thames Water is concerned over the current capacity of the waste water network to support MU/4. There is a need for a Drainage Strategy and potentially new and upgraded drainage infrastructure.	S	Change required. See response to this matter under MU/1 above.	MC7
Natural England requires that Proposal MU/4 should refer to its impact on Roughdown Common SSSI.		Change required. The Council acknowledges the close proximity of the proposal to the SSSI. It is reasonable to amend the planning requirements to refer to MU/4 taking into account its potential impact on the designated site.	MC7
Thames Water is concerned over the current capacity of the waste water network to support MU/6. There is a need for a Drainage Strategy and potentially new and upgraded drainage infrastructure.	S	Change required. See response to this matter under MU/1 above.	MC9
Proposal MU/6: <ul style="list-style-type: none"> Sports England support the comprehensive development scheme on this site. Sports England is concerned over the ability to coordinate delivery of new and replacement playing fields responsive to the needs of users. 		No change. Support noted and welcomed. Both related Proposals SS1 (in the Core Strategy) and MU/6 (alongside the associated master plan) will allow for a coordinated approach to delivery of playing fields despite the likelihood that the scheme itself will come forward in two separate phases. The Council will try to meet the needs of users as best it can in conjunction with other agencies, but its role is to ensure that long-term management is in place for the leisure space rather than to decide who the user will ultimately be. The intention is to provide the land for users alongside improved parking facilities, but no new built sport facilities are included. This is considered, on balance, to be a reasonable quality and scale of provision given the scheme is subject to other development requirements/priorities.	No
There are no waste water infrastructure concerns regarding MU/7.		No change. Comments noted.	No
The General Employment Area (GEA) designation should not be amended as proposal MU/7 may not come forward and there is demand for B-class employment space in Berkhamsted		No change. While there may be limited theoretical demand for additional retail floorspace in the town, it is accepted that there is a qualitative requirement for discount stores in the Borough as proposed. Planning permission has subsequently been granted for the development (4/1317/14) within the General Employment Area (GEA), it is highly likely that the proposal will come forward shortly (especially given the recent history of other discount food store schemes in Hemel Hempstead), and it is appropriate to reflect these factors through the change in the GEA designation. The existing B class use(s) can remain on the site in the interim.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Proposal MU/4: Should the planning requirement refer to:		No change. The Council agrees that this is a sensitive site and location. The points made are valid planning considerations in this respect. The planning requirements already refer to the importance of the adjoining residential	No

<ul style="list-style-type: none"> The maintenance of the semi-rural aspect of Boxmoor and the green corridor through the town? Containing the new car park within the existing one and that it is not dominant in the landscape? Housing being designed to complement the character of Boxmoor? 		area and semi-rural character of Boxmoor in assessing any new development. This will effectively address these matters. However, the detailed points will be considered when preparing a development brief to guide future development of the site and through current work on the Two Waters Master Plan of which this site forms part.	
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No
<i>Other comments from Landowners:</i>			
-		N/A	No
Other new sites and/or designations		Change required. The Council is supporting new Mixed Use designations MU/8 and MU/9 as a consequence of changes to Housing Proposals H/15 and H/16 respectively. See responses to Proposals H/15 and H/16 in Chapter 6 - Providing Homes and Community Services.	MC10 MC11 MC40 MC41
<ul style="list-style-type: none"> H/15 High Street/Kings Road, Berkhamsted H/16 Berkhamsted Civic Centre and land to r/o High Street, Berkhamsted 			

ISSUE: Chapter 3 - Transport			
<div>Number of people/organisations responding10</div> <div><div>Supporting -</div><div><div>Key organisations4</div><div>Individuals0</div><div>Landowners0</div><div>Total4</div></div><div>Objecting -</div><div><div>Key organisations4</div><div>Individuals1</div><div>Landowners2</div><div>Total7</div></div></div> <div>N.B Natural England have supported some policies/paragraphs and objected to others, so they are included in the tally once for each support and object</div>			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			

<p>Is the SA DPD sufficiently justified by up to date evidence on the impact on potential volume of traffic generated and are further transport assessments required?</p> <p>Without strategic evidence base which identified the cumulative impact on the SRN in sufficient detail at junction it will be more difficult for mitigation measure to be agreed through the Local Plan. An alternative is to assess the individual developments through the planning application process.</p>	<p>S</p>	<p>No change. The Council acknowledges the need to have an up to date understanding of the implications of new development on the strategic and local road network. It is important we have continuing liaison with the main transport agencies.</p> <p>Both the local highway authority (Hertfordshire County Council) and the Highways Agency (now called Highways England) who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by either party, although it is acknowledged by the Council that some local highways improvements and mitigation measures will be required relating to specific site proposals. The Council is not proposing growth in the Site Allocations document above the level set out in the Core Strategy. The evidence base reflects this position (see below). Improvements have already been identified in order to accommodate the growth. The technical transport work is on-going, particularly as we take forward work on the new Local Plan, and additional transport assessments will be required for the larger sites at the appropriate time.</p> <p>For Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model (Paramics model). This model is managed by specialist transport consultants on behalf of Hertfordshire County Council.</p> <p>A number of model runs have been undertaken throughout the preparation of the Core Strategy and Site Allocations DPDs to ensure that the most up-to-date information regarding the scale and location of new development within the town is reflected. These are as follows:</p> <ol style="list-style-type: none"> 1. 2008 base model (May 2009). 2. 'Do minimum' models for 2021 and 2031- accompanied by a Future Years Issues Report (May 2009). 3. LDF Option Test Western Hemel (August 2010). 4. Combined Local Plan Test (July 2012). 5. Morrisons Development Test (Summer 2013). <p>In addition to the above a further model run was carried out in Spring 2015 to ensure that there had been no material change in circumstances since 2013 and help inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Highway Authority have advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.</p> <p>In addition to transport modelling, specific traffic studies have been prepared for Local Allocations LA1 and LA3. These have taken account of the Transport Model and the agreed with the Highway Authority. Any necessary highway improvements are referred to in the relevant Local Allocations policies of the Site Allocations document, and elaborated in the site master plans. The Highway Authority has confirmed through their representations that they support the content of all.</p> <p>For parts of the Borough not covered by the Paramics Model, the Council has taken advice from the Highway Authority regarding highway issues. This advice is reflected in the planning requirements for individual sites and in the Schedule of Transport Proposals. Site LA5 currently has a Transport Scoping Report which has also been agreed with HCC.</p> <p>For all development sites, detailed highway issues will be considered as part of the planning application process, for which the Highway Authority are statutory consultees. Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements.</p> <p>Officers met with a representative from Highways England to discuss their comment in May 2015. Highways England have subsequently confirmed by email that their comments should not be treated as an objection to either the overall level of development planned for the Borough, or to any specific site(s). Rather, they required some further clarification regarding the work that had been carried out, and future work planned, to consider the impact of current and future development on the strategic road network. This information has been included in an update to the September 2014</p>	<p>No</p>
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		version of the Sustainable Development Strategy Background Issues Paper. Highways England are also aware (and involved with) the development of a new county-wide transport model that will be used to test the impact of future growth scenarios emerging from the early partial review (new Local Plan) process.	
Whether the Highways Agency (Highways England) should be involved in the transport assessment associated with the East Hemel Hempstead Area Action Plan (AAP).		No change. Comments noted. The Council does intend to involve the Highways Agency and other bodies in future discussions on the AAP, although the latter will be progressed as a separate policy document from the Site Allocations DPD. The Council recognises the strategic and local importance of the road network in and around the AAP area and thus the need to involve the Highway Agency. The Highways Agency are indeed already involved in current work looking at the Hemel Growth Corridor being led by the Local Enterprise partnership (LEP). This will inform the AAP process.	No
Whether the text in 3.10 needs to be strengthened to: 'the existing provision for public car parking will be protected...' (instead of maintained).		No change. There is little difference in the meaning of the two words "protected" and "maintained" in this context .	No
Whether the master plans have adequately set out requirements to ensure planned transport improvements e.g. where it is not thought that 'small scale improvements' would be sufficient and or certainty of bus routes (particular reference to LA3)		No change. The level of detail in each master plan is sufficient at this early stage to identify key transport and other improvements required by the new development. This makes clear what is needed at later stages to allow for appropriate highway improvements and mitigation measures to be secured through developer contributions and agreements. The master plans are supported by a range of technical work, including highway matters. The local highway authority (Hertfordshire County Council) has been consulted on the local allocations throughout preparation of the Core Strategy and Site Allocations DPDs and support the content of these documents. They have been satisfied over the ability in each case of the overall road network to cope with the scale of new development proposed and the nature and suitability of highway works necessary. Liaison with the County Council is on-going. More detail over the timing and type of works required will emerge as schemes are advanced. It is acknowledged that the Council cannot guarantee a bus service will be provided. It can work with developers/landowners to ensure that the infrastructure is in place to accommodate a bus route within a new development. However, the provision of any service is ultimately a business decision to be taken by the bus operator. Furthermore, there are limited funds available to subsidise such new services.	No
Whether Proposal T/17 (Kingshill Way and Shootersway) should be timetabled for short term, not long term, and should be reviewed in case of a change in circumstances.		Change required. The proposal is taken from the list of transport schemes identified in the County Council's Tring, Northchurch and Berkhamsted Urban Transport Plan (UTP) (May 2013). The schemes identified for implementation over the short term are low cost and without significant barriers to implementation. The medium to long term schemes are more difficult to deliver (e.g. the requirement for detailed design/feasibility work, the need for further consultation, land take, and the availability of funding). However, where opportunities arise, schemes could be brought forward earlier subject to overcoming such barriers and the notes to the transport proposals schedule can be amended accordingly to reflect this.	MC14
Whether Proposal T/18 (High Street Corridor) should be timetabled for short term, not long term.		Change required. See response to Proposal T/17 above.	MC14
Whether Proposal T/19 (Lower Kings Road public car park) is supported but should be timetabled for short term, not long term. In addition the allocation should reflect the Council's latest plans for the site.		Change required. See in part response to Proposal T/17. Acknowledge that the Council is undertaking feasibility work which is exploring the proposed development's funding and delivery. Subject to its outcome, this could result in earlier implementation of the scheme, although the position has yet to be confirmed. However, it is reasonable for a change to be made to the planning requirement to reflect such work and the possibility of early delivery.	MC15
Natural England are concerned that the planning requirements to the proposals do not reflect the need to acknowledge impacts on biodiversity.		No change. Acknowledge that transport schemes can have an impact on biodiversity, although this will vary dependent on the nature and scale of works. This issue can be considered as part of the early detailed design/feasibility work. Some schemes in the transport schedule may have a positive effect on biodiversity in terms of promoting public transport and other sustainable transport initiatives, and in reducing congestion and associated vehicular emissions.	No
<i>Organisations who agreed made the following comments:</i>			
Support for T/8 junction improvements at Bedmond Road and Leverstock Green Road.		No change. Support noted and welcomed.	No

The proposal T/20 (Tring railway station – safeguarded site) supported but should be recognised in light of potential Crossrail development		Change required. Support for safeguarding noted and welcomed. It is reasonable to update the supporting text to refer to the impact of the Crossrail project on stations in the Borough, should this scheme go ahead.	MC12
Cycleway T/22 (Tring station to Pitstone): <ul style="list-style-type: none"> • Support for proposal. • Should there be a commitment to maintain the surface? • Should the proposal be brought forward given recent funding from Bucks CC to Herts CC. 		No change. Support noted and welcomed. The County Council is very keen to see this scheme delivered, but they recognise that there are potential land acquisition and legal issues as well as the more urgent need to understand the total cost of the scheme. They are in the early stages of a feasibility report exploring the potential in providing a sustainable transport link between Tring Station and Pitstone. The Design Team are investigating a variety of proposals including a new shared-use footway east of Northfield Road to accommodate cyclists and pedestrians, an advisory on road cycle track, as well as enhancing existing pedestrian facilities. The Design Team will continue their feasibility report into the 2015/16 financial year and assess the practicality of further developments dependent on findings.	No
The spread of employment areas is considered to be sustainable, as well as the identified small scale transport works, which are also supported.		No change. Support noted and welcomed.	No
Natural England support enhancement of footpaths, cycle networks and linkages.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Whether suitable consultation has been undertaken on the detailed layout plans for LA3.		<p>No change.. The Statement of Community Involvement (SCI) is the Council's statement of policy on public consultation for planning document (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has gone beyond the requirements of this SCI, and of consultation requirements set out within Government planning regulation in preparing the Core Strategy and hence establishing the principle of this site. It has also complied with the SCI in preparation of the Site Allocations document and associated master plans.</p> <p>A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council's website and their content has been reported to Members at the appropriate time.</p> <p>Objections to the detailed layout plans for LA3 are dealt with in more detail in the responses to Policy LA3 regarding Local Allocation LA3.</p> <p>Detailed layout plans on all the proposals will follow when schemes progress to the planning application stage. There will be further consultation as part of that process.</p>	No
The extent local infrastructure plans have been taken into account in relation to traffic and other matters.		<p>No change. The Council has prepared a range of technical documents in relation to infrastructure. For example, as part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an Infrastructure Delivery Plan (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range on infrastructure providers. In the case of transport infrastructure, as part of the 2014 Update there has been liaison with the Highway Authority, Highways England and bus and rail providers. The InDP is currently being updated and a revised version will accompany the Submission version of the Site Allocations DPD. This update will ensure key infrastructure concerns are raised with providers and any necessary amendments made to the draft master plans and other allocations.</p> <p>The Council has used the information provided through the InDP to ensure new development meets identified demand generated by the new homes. For example, it has set out specific infrastructure requirements and contributions in all of the Local Allocations and, where appropriate, other large housing allocations. This has included on and off-site road improvements. The technical work supporting the Local Allocations has also identified the need for local level / site-</p>	No

		specific infrastructure and improvements that has been incorporated into the associated planning requirements / draft master plans.	
Individuals who agreed made the following comments:			
-		N/A	No
Landowners			
Landowners who disagreed made the following comments:			
Whether Policy SA3 contributes towards the aims and implementation of Core Strategy Policy CS8 with particular reference to the level of car parking provision to serve rail commuters in Berkhamsted. Does this justify identifying new provision on land to the east of New Road?		No change. The Council acknowledges that the amount of car parking is constrained in Berkhamsted town centre and opportunities for new provision are limited given its built-up and historic character. However, the station car park has recently been decked which has increased capacity for commuters. New car parking is planned under Proposal T/19 which the Council is currently testing its feasibility, and this could further increase spaces in the town centre. Thus, there is no overriding justification for alternative provision, especially in a sensitive greenfield / Green Belt location. Not all parking demand should necessarily be met by new provision. Car parking should be carefully managed to complement other sustainable transport measures e.g. as set out in the County Council's Tring, Northchurch and Berkhamsted Urban Transport Plan (May 2013).	No
Landowners who agreed made the following comments:			
-		N/A	No
Other comments from Landowners:			
Whether Policy SA3 should state that the transport proposals solely relate to the Site Allocations DPD.		Change required. Acknowledge that the plan area excludes the East Hemel Hempstead Area Action Plan area and that a small amendment to the wording of Policy SA3 is reasonable in order to clarify this.	MC13
Other new sites and/or designations <ul style="list-style-type: none">Land to the east of New Road (new car park)		No change. See earlier response above to Policy SA3.	No
ISSUE: Chapter 4 - Economic Development			
<div>Number of people/organisations responding9</div> <div><div>Supporting -</div><div><div>Key organisations4</div><div>Individuals0</div><div>Landowners1</div><div>Total5</div></div></div> <div><div>Objecting -</div><div><div>Key organisations1</div><div>Individuals0</div><div>Landowners3</div><div>Total4</div></div></div>			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?

Organisations			
<i>Organisations who disagreed made the following comments:</i>			
Map quality needs improving.		No change. The quality of the mapping in the printed documents was affected by the copying process. The maps on the Council's online portal were of a much higher quality. Higher resolution maps for sites were provided if requested, in either paper or electronic form. The map quality will be improved in the Submission version of the document and when the Policies Map is fully updated.	No
The Employment uses for Billet Lane GEA should include B2 in order to maximise potential employment uses and opportunities given the lack of B Class employment in Berkhamsted.		No change. The retained part of the GEA has been assessed as unsuitable for B2 uses given its proximity to existing and proposed housing. See Appendix 1 of the 'Strengthening Economic Prosperity Site Allocations Background Issues Paper' (September 2014).	No
<i>Organisations who agreed made the following comments:</i>			
The amendment to the boundary of the GEA designation at the Icknield Way employment site, removing the north eastern section from the GEA, and the proposed allocation for housing (H/18) means that the site is no longer suitable for an 'Employment Land Area of Search' in the Hertfordshire Waste Site Allocations Document (HWSAD). However, as this document has been adopted, this designation cannot be changed in the HWSAD.		No change. The designation referred to is a general designation identifying an area of search, but with nothing proposed on the site referred to. There will still be opportunities for waste uses if an appropriate scheme comes forward within the wider GEA.	No
Acknowledgement of the change in the boundary of the Bovingdon Brickworks. As the only working brick kiln in the County it is recognised in the Minerals Local Plan (2007) and will be included in the forthcoming review.		No change. Comments noted.	No
Support the planning requirements relating to the retention, conservation and enhancement of listed buildings within a number of the GEAs.		No change. Support noted and welcomed.	No
Regarding the Akeman Street GEA, concern regarding the impact of social and community facilities on the local roads in terms of parking.		No change. All planning applications will be required to comply with Policy CS8: Sustainable Transport of the Core Strategy which requires sufficient, safe and convenient car parking. The Highway Authority is also consulted upon all planning applications.	No
Support for the Cross reference to the Hertfordshire County Council Waste Site Allocations document.		No change. Support noted and welcomed.	No
Support for the proposed extension to Icknield Way Employment area as part of Local Allocation LA5.		No change. Support noted and welcomed.	No
Support for the requirement that allocations deliver environmental improvements where relevant.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No

Landowners			
<i>Landowners who disagreed made the following comments:</i>			
Policy SA5 should state that the list of General Employment Area (GEAs) relates to the Site Allocations DPD area only.		No change. Footnote 9 to Policy SA5 clearly states that the <i>'Policy on GEAs in the Maylands Business Park remains as set out in the saved policies of the Dacorum Borough Local Plan until superseded by the Area Action Plan'</i> .	No
<p>Akeman Street GEA should be entirely re-designated for housing as an extension to housing site H/20, instead of partially retained as a GEA for the following reasons:</p> <ul style="list-style-type: none"> - The scale of the Council's employment land requirement; - The Council's employment land review concluded that alternative uses should be considered on this site; - The Core Strategy envisages the site being developed for non-B Class uses; - Provision is being made elsewhere for employment development in sufficient quantities to mitigate any loss encountered at Akeman Street; - The site is not ideal for commercial uses as it is surrounded by housing, has difficult access, is constrained by heritage assets and offers accommodation that is not suited to modern businesses; - The need to significantly boost the supply of housing; - The site is ideal for housing as it is PDL, within the urban area, well served by public transport, close to the town centre and adjacent to existing residential areas; - Housing is deliverable immediately. - Maintaining the GEA designation is not consistent with national policy, in particular NPPF paragraphs 14, 17, 22, 47, 51, 151 and 161. 		<p>No change. Issue considered as part of the Core Strategy process. The Core Strategy states that Akeman Street GEA will be retained but that it will also provide for some social and community facilities, which is the approach followed in the Site Allocations DPD.</p> <p>The 'Strengthening Economic Prosperity Site Allocations Background Issues Paper' (September 2014) considers that sufficient land is available to meet the employment floorspace targets in the Core Strategy whilst complying with the requirements of the NPPF to be flexible.</p> <p>Although The South West Hertfordshire Employment Land Update (2010) concludes that some aspects of the Akeman Street GEA make it less than ideal as a GEA, the report does not consider it unsuitable for use as a GEA, and this is only one of many considerations. In planning for future development, it is important that the Council strikes an appropriate balance between homes and jobs as set out in paragraph 17 of the NPPF. In the case of Tring, the Core Strategy (Tring Place Strategy) seeks to maintain the current level of employment provision and the retention of the GEAs (of which there are few in the town) are critical in this respect. The part loss of the GEA under proposal H/20 reflects this balanced approach to housing and employment. While B1-use class will remain the principal use, the Akeman Street GEA will allow a degree of flexibility (albeit) for other non-residential uses.</p> <p>The NPPF places considerable emphasis on Council's meeting their development needs (para. 14), and in particular to <i>"significantly boost the housing supply"</i> (para. 47). In considering these points, Councils are expected to meet their <i>"objectively assessed needs"</i> for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.</p> <p>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development submitted by developers through the decision-making (planning application) rather than the plan-making process.</p> <p>In identifying the level, type and location of housing allocations, the Site Allocations DPD had regard to the strategic framework provided by the Core Strategy. The extent the objectively assessed need could be met was considered in detail through appraising different housing options, and in consulting on and testing an appropriate housing target at examination of the Core Strategy. The examination Inspector, in finding the Core Strategy sound, endorsed the Council's target of 430 dwellings per annum subject to an early review of the Core Strategy incorporating a comprehensive review of the Green Belt and consideration of housing numbers. This process is being taken forward through the single Local Plan. Technical work is being carried out in order to inform decisions on this and to test the evidence base against the latest population and household projections. This process will allow for a strategic and comprehensive approach to housing numbers and their implication on the housing supply, Green Belt and local infrastructure. A piecemeal approach to the housing target and sites would undermine this.</p> <p>Paragraph 51 of the NPPF states that authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. The explanation above regarding the need to balance jobs and homes, along with the explanation of</p>	No

		<p>the Core Strategy's approach to meeting the borough's housing need demonstrate that the continued designation of the Akeman Street GEA does not contradict this paragraph of the NPPF.</p> <p>Paragraph 22 of the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The Akeman Street GEA does not suffer from a persistent lack of occupation and therefore its continued GEA designation does not contradict this paragraph of the NPPF.</p> <p>Paragraph 151 of the NPPF states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development, and that they must be consistent with the principles and policies of the NPPF. The Council considers that the Site Allocations complies with paragraph 151 of the NPPF – and no justification is provided to support the claim to the contrary .</p> <p>Paragraph 161 of the NPPF pertains to using the evidence base to properly assess the future needs for economic activity and the role and capacity of town centres. . The Council considers that the Site Allocations complies with paragraph 161 of the NPPF – and no justification is provided to support the claim to the contrary.</p>	
<p>The proposed amendment to the boundary of the Bourne End Mills Employment Area in the Green Belt to bring it in line with the boundary of the new MDS is too restrictive and will prohibit the policy aim of SA6 to deliver substantial environmental improvement including landscaping and rationalisation of layout. It removes the policy support for the physical improvement of the wider employment area and as such compromises the likely form of the redevelopment. The change in boundary removes an area of unattractive hard standing from the Employment Area which needs environmental improvements. The amendment also reduced the scale of economic development that could be accommodated on the site.</p> <p>The justification for altering the boundary is given as <i>'to reflect the extent of development shown in the planning permission for redevelopment of the site'</i>, however, it does not represent the line of the extant planning permission.</p>	S	<p>Change required. The Council accepts the argument that the boundary of the Employment Area in the Green Belt should be extended to include the former area of open storage in the south western part of the site to give policy support to environmental improvements over the whole site. However, in order to protect the open nature of this area the MDS external boundary will also be changed to be contiguous with the amended boundary of the Employment Area in the Green Belt and an infill area will be added. See also response to issues raised regarding Chapter 2 – Promoting Sustainable Development – excluding Mixed Use Development.</p>	SC 5 SC 4
<i>Landowners who agreed made the following comments:</i>			
Support for the change to the boundary of Apsley Mills GEA.		No change. Support noted and welcomed.	No

ISSUE: Chapter 5 - Retail

Number of people/organisations responding 2

Supporting -

Key organisations	0
Individuals	0
Landowners	1
Total	1

Objecting - Key organisations 0 Individuals 0 Landowners 1 Total 1			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
The Core Strategy should have considered the future of Jarman Park District Centre/Jarman Fields in the retail hierarchy to reflect its close links to the town centre.		No change. The Core Strategy amended the designation of Jarman Fields from a 'Local Centre with a district shopping function' to an 'Out of centre Retail and Leisure location' to better reflect the uses currently there and its role in the retail hierarchy. This was a matter considered by the Core Strategy Planning Inspector. The Core Strategy Inspector's Report was issued in July 2013. This stated his conclusions, that, subject to some modifications, the Core Strategy was 'sound'. An Inspector can only reach this conclusion if they are satisfied that the Council has fulfilled certain tests. The Core Strategy must be prepared in accordance with the "duty to co-operate", legal and procedural requirements, and whether it is sound. Soundness is determined with reference to the tests set out in paragraph 182 of the National Planning Policy Framework – i.e. the Core Strategy must be positively prepared, justified, effective and consistent with national policy. The Inspector was satisfied in all respects.	No
The schedule of uses in Table 1 relating to Jarman Fields conflicts with the text in the Core Strategy which acknowledges that the mix of uses may change over time. The main uses in Table 1 should be more flexible to allow for change of uses over time as per the Core Strategy.		No change. The schedule of uses in table 1 is taken directly from the Core Strategy so no conflict arises. With regards to Jarman Fields, the supporting text in the Core Strategy states that ' <i>Whilst precise mix and quantum of uses may change over time, the role of the site should remain complementary to the role of the town centre...</i> '. It is considered important to retain some restriction over the type of retail permissible at Jarman Fields to ensure it complements, rather than competes with, the town centre.	No
With regards to the Retail Proposal site S/1 the planning requirements should not refer to a specific planning permission with specific consents. This makes the table unsound as any new permissions	S	Change required. On further consideration, the Council agrees that reference to a particular planning permission as a planning requirement is not the best approach. The planning requirements will be amended, although the key	SC6

granted would render this table out of date.		principles will be retained.	
<i>Landowners who agreed made the following comments:</i>			
Support for Retail Proposal site S/1, in particular support for the designated use of 'non-food retail warehousing'.		No change. Support noted and welcomed.	No

ISSUE: Chapter 6 – Housing - (a) General			
<div>Number of people/organisations responding24</div> <div><div><div>Supporting -</div><div><div>Key organisations7</div><div>Individuals1</div><div>Landowners3</div><div>Total11</div></div></div><div><div>Objecting -</div><div><div>Key organisations8</div><div>Individuals3</div><div>Landowners6</div><div>Total17</div></div></div><div>N.B Hertfordshire County Council, Sports England, English Heritage, and the Environment Agency have supported some policies/paragraphs and objected to others, so they are included in the tally once for each support and object</div></div>			
NOTE. For detailed responses to issues raised relating to the Local Allocation sites, please also see Policies LA1-LA6 below and separate Report of Consultation relating to the associated draft master plans.			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			
Whether Policies LA1, LA2, LA4, LA5 and LA6 should make specific reference to education and other contributions through the CIL.		No change. There already is adequate reference to educational contributions and the CIL. Policies LA1-LA6 all refer to the need for these developments to make a range of contributions, which would ultimately include educational contributions. This approach is set out in Policy CS35 of the Core Strategy and that these will be achieved through the future implementation of the CIL. The associated master plans also refer to educational contributions and their potential delivery through the CIL.	No
Whether the housing chapter should refer to and housing programme take account of, recent Ministerial statements and consequent changes to the NPPG on the Green Belt.	S	No change. The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area’s objectively assessed need. It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy. A key role of the Site Allocations DPD is to take forward the strategic policies and targets relating to housing within the Core Strategy and ensure that these are delivered on the ground. It is the role of the early partial	No

		<p>review (in the form of a new single Local Plan) to look again at longer term needs and take account of a whole range of Government policies and guidance, including those relating to the Green Belt.</p> <p>Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to “<i>significantly boost the housing supply</i>” (para. 47). In considering these points, Councils are expected to meet their “<i>objectively assessed needs</i>” for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.</p> <p>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making (planning application) rather than the plan-making process. The changes do not affect how we implement plans that are already adopted, such as our Core Strategy and associated proposals that it contains.</p> <p>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council progresses the Site Allocations DPD.</p>	
Whether the housing target takes sufficient account of an objectively assessed need?		No change. In identifying the level, type and location of allocations, the Site Allocations DPD should have regards to the strategic framework provided by the Core Strategy. The extent the objectively assessed need could be met was considered in detail through appraising different housing options, and in consulting on and testing an appropriate housing target at examination of the Core Strategy. The examination Inspector, in finding the Core Strategy sound, endorsed the Council’s target of 430 dwellings per annum subject to an early review of the Core Strategy incorporating a comprehensive review of the Green Belt and consideration of housing numbers. This process is being taken forward through the new single Local Plan. Technical work is being carried out in order to inform decisions on this and to test the evidence base against the latest population and household projections. This process will allow for a strategic and comprehensive approach to housing numbers and their implication on the housing supply, Green Belt and local infrastructure to be assessed..	No
Support for the delivery of a 2FE primary school under Policy LA3 through s106 contributions.		No change. Support noted and welcomed.	No
Support for the need for additional school provision to serve the future housing in north east Hemel Hempstead under the East Hemel Hempstead Area Action Plan.		No change. Support noted and welcomed.	No
Whether the housing programme fully takes into account the significant contribution from windfalls		No change. The Council is satisfied that the housing programme is robust and takes into account a full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, the Council has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to fully understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the roll of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council’s Strategic Housing Land Availability Assessment (SHLAA). This information will help inform the new single Local Plan process.	No
Whether the contribution from windfalls justifies reviewing the release of the Local Allocations from the Green Belt.		No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of ‘brownfield’ sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward	No

		<p>for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at a full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to fully understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p>	
The suitability of Local Allocation LA3 in relation to its impact on local		No change. The Council has taken time and care to identify what are considered, on balance, to be the most	No

services and road and other infrastructure and the provision of a traveller site.		<p>appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF), as this was published in advance of the Core Strategy examination. This requires, amongst other things, for Councils to 'positively seek opportunities to meet the development needs of the area' (para 14); and 'boost significantly the supply of new housing' (para 47).</p> <p>The decisions made regarding both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector's Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector's main concern when weighing up whether or not to find the Core Strategy 'sound' or not, was if the Council had allocated sufficient land for housing, not if any of the Green Belt sites should be removed from the plan.</p> <p>The principle of releasing land from the Green Belt and bringing forward this site for housing and associated uses has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p> <p>See also related responses to Policy LA3 and the associated master plan.</p>	
The need for sites H/5, H/10, H/14, and H/22 to be evaluated within an appropriate site specific Flood Risk Assessment (FRA).		Change required. Adequate reference to the need for a site-specific FRA is already provided in the planning requirements to H/5, H/10, and H/14. No reference is given to the need for a FRA under proposals H/22 and it is reasonable to provide this.	MC59
Proposal H/1: The potential impact of the proposal on protected species should they continue to survive in this area.		Change required. It is reasonable to amend the planning requirements to ensure the impact of the development on any surviving protected species is taken into account. However, this is a small and built-up site and its wildlife potential is likely to be limited.	MC42
Proposal H/6: The need for the development to conserve and enhance adjoining and nearby heritage assets.		Change required. The Council acknowledges the importance of new development being sensitive to heritage assets. However, the site is shortly to be occupied for health-related purposes and will therefore no longer be available as a housing allocation. The proposal will need to be deleted as a result. No change to the former and change required for the latter.	MC47
Proposal H/7: Whether the planning requirements: <ul style="list-style-type: none"> enable the delivery of a replacement sports facility that is equivalent or better provision in terms of quantity and quality in a suitable location? ensure the new facility is complete and operational before the development proceeds? make clear where the sports facility will be relocated to. 		<p>Change required. The Council acknowledge that it is a reasonable expectation that the replacement facility should be of at least equivalent quantity and quality and is located in a suitable location. These broad principles are accepted in justifying the housing development within an Open Land setting and the facility's potential relocation under allocation MU/5 at Bunkers Lane, Hemel Hempstead. The planning requirements should be amended to clearly reflect these points. It would be unlikely that the club would relocate if these were not achievable. The Council does not want to dictate the nature of the new facilities above and beyond being of equivalent quality as this would be subject to the overall viability of the housing proposal and the availability of other funding sources.</p> <p>The Council accepts in principle, that the facility should be substantially progressed before any housing scheme has commenced to ensure its ultimate delivery, and the planning requirements can be amended to reflect this broad approach. The detailed timing of the sports facility can be readily dealt with in practice during the planning application process e.g. as a condition and / or as part of an obligation.</p> <p>As referred to above, it is intended that the facilities will be relocated through implementation of mixed use allocation MU/5. This is not explicit in the planning requirements and a clarification/cross referencing of this point would be helpful in terms of explaining its delivery in practice.</p>	MC48
Proposal H/8: The impact of the proposal on open grassland of local biodiversity		Change required. The allocation is a carry forward of a long standing local plan housing proposal (DBLP Proposal H40). Its suitability in principle for housing has thus been accepted and established over time. It is thus reasonable to	MC50

value and on the adjoining Wildlife Site.		<p>continue to identify the land as a housing allocation. Whilst it may be of local biodiversity value it is not affected by any statutory designation, or identified as a Local Nature Reserve or Wildlife Site. The adjoining land to the north is designated as a Wildlife Site and will be safeguarded for open space, including potential to manage and enhance its nature conservation value under allocation MU/2.</p> <p>However, a minor change is required as the H/8 allocation has been incorrectly shown in the Map Book and needs to be amended to exclude a small area to the east of the allocation. This will further reduce the impact of the development on the wildlife interest.</p>	
<p>Proposal H/17:</p> <ul style="list-style-type: none"> Is the reference to a “Gateway” location appropriate? Is the scale of development justified? Should the normal requirements for amenity space be relaxed? 		<p>Change required. It is appropriate to refer to the location as an entrance to the Conservation Area, but removal of “gateway” reference would not undermine the general objective of delivering a high quality scheme. Effective use should generally be made of urban land, although it is recognised that this needs to be moderated by other factors such as local character and achieving appropriate environmental standards. The high density is a reflection that the allocation is likely to be delivered in the form of flats. Some degree of relaxation over amenity space is appropriate given garden depths vary in the historic parts of the town, local plan standards already allow for some flexibility in standards, and flatted developments generally have more limited amounts of amenity space compared to houses. The site’s location in the Conservation Area will ultimately act as a control regarding the design, layout and quality of any development.</p>	MC58
<p>Proposal H/20:</p> <p>Should the height of buildings be restricted to only a 2 storeys terraced development in order to reflect the historic character and appearance of the Tring Conservation Area?</p>		<p>No change. The Council acknowledges the importance of new development being sensitive to heritage assets. However, it does not want to be overly prescriptive regarding design guidance in order not to stifle innovation. For example, slightly taller buildings and properties other than terraces could provide for focal points or landmark buildings within the development. The type and height of buildings would still need to be justified in terms of local character and the Conservation Area.</p>	No
<p>Proposal H/22:</p> <p>Should there be a presumption in favour of retaining 131 High Street given its positive contribution to the Markyate Conservation Area?</p>		<p>Change required. Acknowledge that 131 High Street is of heritage merit, although the Council cannot insist on its retention given it has no formal protected status. Its retention should not be at the expense of delivering a high quality scheme across the site given its prominent corner plot within the Conservation Area and the opportunity to remove less attractive buildings. However, the planning requirements could refer to exploring the possibility of retaining the building as an option.</p>	MC59
<p>Proposal MU/1:</p> <p>Should the planning requirements refer to the retention and reinforcement of trees along Queensway and to clarify the height of replacement buildings?</p>		<p>No change. The Council does not wish to be too prescriptive over design in order not to inhibit innovation, but it accepts that it is appropriate to retain and reinforce trees along Queensway and that the location is sensitive to heights of new buildings. The latter would be tempered by local character and the site’s proximity to the Old Town Conservation Area. The land is subject to changes in level which could help it better accommodate taller elements. Both issues are already effectively covered in existing design guidance provided by the Hemel Hempstead Town Centre Master Plan and Gade Zone Planning Statement. Both of these documents are already referred to in the planning requirements.</p>	No
<p>Proposal MU/6</p> <p>Should the housing capacity be reduced from 150 to 140 homes?</p>		<p>No change. The capacity is indicative only and seeks to guide the broad scale of the proposal and ensure continuing effective use of the site. The capacity has been reduced from the figure set out in the Core Strategy (from 180 homes,) and the change informal discussions with the developer. Despite the existing covenant, it has always been envisaged that the northern parcel would be slightly denser than the southern parcel (the subject of the current permission). Given these factors, the capacity is considered reasonable.</p>	No
<p>The Place Strategy map for Berkhamsted incorrectly annotates MU/6 as MU/7 (and vice-versa).</p>		<p>Change required. Error noted. A similar error has also been identified for MU/7 which has been labelled as MU/6. Amend map as an editorial change to ensure both proposals are correctly annotated.</p>	E
<p>Map Book - Proposal H/20:</p> <p>Whether the designation should be extended to include the whole of the Akeman Street GEA?</p>		<p>No change. In planning for future development, it is important that the Council strikes an appropriate balance between homes and jobs. In the case of Tring, the Core Strategy (Tring Place Strategy) seeks to maintain the current level of employment provision and the retention of the GEAs (of which there are few in the town) are critical in this respect. The part loss of the GEA under proposal H/20 reflects this balanced approach to housing and employment. While B1-use class will remain the principal use, the Akeman Street GEA will allow a degree of flexibility (albeit) for other non-residential uses.</p>	No

Organisations who agreed made the following comments:			
The ability and reasonableness under the Duty to Cooperate for Dacorum to meet the unmet needs of Luton.		No change. The Council takes its role under the Duty to Cooperate (DTC) seriously. In identifying the level, type and location of allocations, the Site Allocations DPD should have regards to the strategic framework provided by the Core Strategy. The extent the objectively assessed need could be met and the ability to accommodate unmet need of other districts was considered in detail through appraising different housing options, and in consulting widely on and testing an appropriate housing target at examination of 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 an early review of the Core Strategy. The latter is being taken forward through work on its single Local Plan which includes continuing engagement with key stakeholders on cross-boundary matters under the DTC. For example this covers its involvement with the Luton-Central Bedfordshire SHMA. 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 single Local Plan.	No
There is an adequate evidence base, including the site appraisal process and sustainability appraisal, and consideration of flood risk to support the policies and sites.		No change. Comments noted and welcomed.	No
The Highway Authority supports the Local Allocations for identifying supporting infrastructure in their associated master plans.		No change. Support noted and welcomed.	No
Support the principle of allocations H/18, H/19 and H/20.		No change. Support noted and welcomed.	
Thames Water does not raise concerns over water supply and waste water capability for H/18, H/19, and H/20.		No change. Comments noted.	No
Thames Water does not raise concerns over waste water capability in relation to H/1, H/7, H/13, H/15, H/16, H/21, H/22, H/23, and H/24.		No change. Comments noted.	No
The suitability of waste water infrastructure to accommodate proposals H/2, H/3, H/4, H/5, H/6, H/8, H/9, H/10, H/11, H/12, H/14, and H/17.		<p>Change required. With regards to the level of development sought, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific amendments to the text of the Site Allocations document with regard to the Local Allocations.</p> <p>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers of some larger schemes at the planning application stage. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. Therefore, it is considered appropriate to add a short reference to the planning requirements to refer to the need for liaison with Thames Water and the potential requirement for specific technical work to be carried out to assess capacity issues. This will allow flexibility at the pre-application stage should any more specific upgrade requirements be identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues.</p> <p>Amend planning requirements for these allocations to require early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery in each case.</p>	MC43-47 inclusive, MC49, MC51-55 inclusive. and MC58
Proposal H/5: <ul style="list-style-type: none"> Should the capacity be increased to make the site more viable and to take into account the cost of decontaminating the site? Can a higher capacity be accommodated within the Open Land setting and bearing in mind other constraints? 		Change required. The capacity set reflects a number of factors: the footprint of the former use, its gateway location into the town, its Open Land setting, flood risk concerns, and the lack of detailed design consideration available at the time to inform the housing numbers. However, the capacity is indicative and could be exceeded if fully justified against these constraints, and subject to viability considerations and achieving a high quality design. Significantly increasing the capacity without detailed information could undermine these objectives. There have been early discussions over the land and it has been concluded that there could be scope to support an increased scale of development at this location, but this would have to be carefully justified through the submission of an application. No change to the capacity is warranted, but it is accepted that it would be helpful in the planning requirements to refer to the potential, in	MC46

		principle, for the capacity to be exceeded where it achieves good design and protects the character and setting of the site.	
<p>Proposal H/15:</p> <ul style="list-style-type: none"> Should the site boundary be enlarged to include the adjacent library site? If extended, should it be designated as a mixed use allocation? Should the net capacity be dependent on achieving an acceptable scale of development in the town centre and Conservation Area? Should more detailed consideration be given to how the corner is addressed and the height of buildings (2 ½ - 3 storeys)? 		<p>Change required. Since allocation of the site, a scheme has been actively pursued that includes the adjoining library site. On this basis it would be reasonable to amend the allocation to reflect this change in circumstances and a resultant increase in the housing capacity. Given this revised scheme includes both residential and community uses, a mixed use allocation would be appropriate. As this is a town centre location, the principle of a high density scheme is acceptable, but it is acknowledged that the capacity achievable will be tempered by its prominent setting in the Conservation Area. The latter point is already sufficiently covered in the planning requirements in seeking to achieve a high quality scheme and through the application of other local design and conservation policies.</p> <p>The Council does not want to be too prescriptive over the design. However, it accepts the general principle that care needs to be taken over of the height and corner treatment of buildings in this prominent location. A reference to these points in the planning requirement is reasonable, although their consideration will be tempered by the proposal's siting in the Conservation Area.</p>	MC56 MC40
<p>Proposal H/16:</p> <ul style="list-style-type: none"> Should the planning requirements better reflect its social and community use? Would it be more appropriate to designate the proposal as a mixed use allocation? The ability to achieve a taller development to the High Street if the façade is being retained. 		<p>Change required. The Council acknowledges the existing social and community role of the site and accepts that a reference to this would be beneficial. The planning requirements should make clear the intention to retain this function in any new development. Given that this revised scheme includes both residential and community uses, a mixed use allocation would be appropriate.</p> <p>The Council accepts that the height of new buildings will be dictated by retention of the façade. It never intended buildings would exceed this height. The planning requirements simply seek to direct taller elements to the High Street frontage (within the façade) rather than to the rear which is of a more domestic scale.</p>	MC57 MC41
<p>Proposal H/17:</p> <ul style="list-style-type: none"> Development of this gap site would enhance the setting of the Conservation Area. Should the development be limited to 2 storeys and be sited tight to the back of the pavement? 		<p>Change required. Support noted and welcomed for principle of development. Locating the development tight to the rear of the pavement is appropriate in the local context and it would be helpful to amend the planning requirement to reflect this. It is difficult in principle to restrict the height of buildings to 2 storeys given that some surrounding buildings are taller.</p>	MC58
<p>Proposal H/18:</p> <p>The suitability of the Miswell Lane / Icknield Way junction to serve the allocation.</p>		<p>No change. There is no evidence provided to point to the junction not being suitable to serve the proposal or that it could not be resolved. Its impact will be dependent on the scale of development that eventually comes forward. However, the suitability of the access and the road junction will be a normal development management consideration and the views of the local Highway Authority will be sought at that stage. If necessary, the development will have to contribute to junction improvements.</p>	No
<p>Proposal MU/5:</p> <ul style="list-style-type: none"> Support for the proposal in order to allow the tennis club to relocate and expand, to meet identified need. Support for preparation of a master plan due to the need to accommodate a range of leisure uses and the sensitivities of the Green Belt. 		<p>No change. The support on both points is noted and welcomed.</p>	No
<p>Proposal MU/6:</p> <p>Support requirement for comprehensive development on the site so as to co-ordinate delivery of the new and replacement playing fields and associated sports facilities.</p>		<p>No change. The support is noted and welcomed.</p>	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
<p>Proposal H/7:</p> <ul style="list-style-type: none"> The suitability of the access. 		<p>No change. There is no evidence to point to a scheme not being able to secure an acceptable access. An appropriate level of off-street parking will need to be provided, and this together with its relatively modest scale should not</p>	No

<ul style="list-style-type: none"> The ability of Grasmere Close to accommodate additional parking and traffic. The suitability of the capacity and timing of the development. 		necessarily add to existing parking and traffic problems on Grasmere Close sufficient to warrant removal of the allocation. The indicative capacity is considered acceptable in terms of scale and density, but its open land setting is likely to constrain the number of homes that can ultimately be delivered. Securing an alternative siting for the tennis club will of necessity dictate the timing of any scheme, but outside of this there is no strong justification to phase the development in any way.	
<p>Proposal MU/4: Should the planning requirement refer to:</p> <ul style="list-style-type: none"> The maintenance of the semi-rural aspect of Boxmoor and the green corridor through the town? Containing the new car park within the existing one and that it is not dominant in the landscape? Housing being designed to complement the character of Boxmoor? 		No change. The Council agrees that this is a sensitive site and location. The points made are valid planning considerations in this respect. The planning requirements already refer to the importance of the adjoining residential area and semi-rural character of Boxmoor in assessing any new development. This will effectively address these matters. However, the detailed points will be considered when preparing a development brief to guide future development of the site.	No
<p>Proposal and Map Book – H/19: The suitability of the designation for housing in light of the proposed future use of the land for leisure purposes.</p>		No change. The Council acknowledges that there are existing non-residential uses within the site and these occupiers may wish to move and expand into other buildings. The application of policy would still allow some flexibility over alternative uses i.e. they can remain and buildings can be reused in the interim. This would allow for new uses within the site, the occupation of vacant units, and potentially permit existing users to relocate and grow. However, it is important to retain the housing designation to make clear the preferred future use of the site should redevelopment take place, and to reflect past residential interest on adjoining land.	No
<i>Individuals who agreed made the following comments:</i>			
<p>Proposal H/18: Support for allocation as a more appropriate designation for the land than employment.</p>		No change. Support noted and welcomed.	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
<p>Concerns regarding the robustness of the housing programme, especially with regard to:</p> <ul style="list-style-type: none"> The level of completions in meeting the housing requirement. Whether traveller pitches should be included within the overall housing requirement. The flexibility of the housing programme should slippage occur. 		<p>No change. The Council is satisfied with the robustness of the housing programme. The latest monitoring, as set out in the Council's 2013/14 Annual Monitoring Report, indicates that there is a 5.9 year supply of housing and that the housing requirement can be met and indeed exceeded. The Council accepts that completion levels have varied over time (both yearly under and over achievement of the annual housing target), but previous plan targets have been achieved, the housing market and economy are improving, future supply is good and rates of building activity are high. These factors will lead to increasing levels of completions sufficient to secure achievement of the overall housing target.</p> <p>Traveller pitches comprise of only a very small element of the housing programme as a whole (17 pitches out of the housing target of 10,750 homes). The Council are not reliant on this source of supply to meet the housing requirement. They do not represent a traditional form of housing development, but do provide a settled base for travellers, are seen as meeting a specific identified need, and effectively provide for a specialised form of low cost / affordable housing. Therefore, it is reasonable that they are seen as contributing to the housing supply/housing programme (albeit in a limited way).</p> <p>Given the current supply position, market conditions, and activity rates, the Council does not envisage the need for an immediate contingency. However, the Council monitors its housing supply regularly and would react quickly if any significant shortfalls were identified. There is flexibility in the housing programme in terms of 5-year supply as the Local Allocations (LA1-4 and LA6) could be brought forward under Policy CS4 should any slippage occur.</p>	No
<p>The level of new homes proposed for Berkhamsted, especially</p> <ul style="list-style-type: none"> The sufficiency of sites to meet the 1,180 new homes target for 		No change. The target for the town set out in the Core Strategy (Berkhamsted Place Strategy) is indicative only and	No

<p>Berkhamsted set out in the Core Strategy.</p> <ul style="list-style-type: none"> Whether it is appropriate to identify additional allocations in Berkhamsted e.g. land to the east of New Road. The ability to achieve suitable levels of affordable housing in the town. 		<p>is not to be treated as an absolute (para. 19.6). However, given completions since 2006, current commitments and allocations, and future large and small windfall, the Council is confident that this broad level of housing can be achieved over the lifetime of the plan. There is also a sufficient supply of land to provide for a good mix of type and tenure of housing in the town.</p>	
<p>Whether land at Denny's Lane, Berkhamsted should be identified as a new allocation (with subsequent changes to related housing policy / schedule) because:</p> <ul style="list-style-type: none"> The housing figure does not meet the full objectively assessed need (at 540 dwellings pa); Of the strategic priority provided by the NPPF to housing and jobs; The approach to an early partial review of the Core Strategy (and the housing target) is too leisurely; More sites need to be released to prevent an under provision of housing. There is a substantial shortfall of housing to be provided in the town. The land could be released without harm to the integrity or character of the Green Belt. 		<p>The Site Allocations must have regards to the planning framework and strategic objectives set out in the Core Strategy. This approach to housing and the Green Belt was accepted by the Planning Inspector in finding the plan sound (subject to an early partial review). The Inspector was also content with the timing of the review. The Council is satisfied that the housing target can be met through the housing programme and, given future supply in the town and across the borough, further Green Belt releases are not justified. The role of the Site Allocations is to deliver the housing requirements set out in Policy CS17 and not to revisit the Green Belt. It is better that the future level of housing and the role of the Green Belt in accommodating this, is dealt with comprehensively through progressing the single Local Plan (early partial review of the Core Strategy).</p>	No
<p>Whether the Site Allocations DPD should clarify the housing contribution from the East Hemel Hempstead Area Action Plan (Action Plan)</p>		<p>No change. The Site Allocations DPD excludes any detailed reference to housing arising from the Action Plan area as the latter is to be progressed as a separate policy document. The main emphasis is to explain the contribution of the Site Allocations to the housing programme and that there is a sufficient overall supply of land to meet the housing requirement. It is not critical to include a detailed list of all sites and/or their total contribution to the Action Plan area as the principal sites are already identified in Table 2. This provides a reasonable indication of the future scale of development there.</p>	No
<p>Should the housing schedule include an additional allocation at Button House, Pix Farm Lane, Bourne End in order to boost housing supply.</p>		<p>No change. The Council is satisfied that it has identified sufficient housing land to meet its housing requirement. It is not critical for all sites to be identified as an allocation in order to be progressed. This commercial site could reasonably be pursued for housing through the development management process subject to achieving an appropriate design and layout and its impact on the openness of the Green Belt.</p>	No
<p>Proposal H/24:</p> <ul style="list-style-type: none"> The reasonableness of the indicative housing capacity. The role of community facilities in considering the appropriate scale of residential development. 		<p>No change. The net capacity is considered reasonable given the level and spread of existing buildings on the site, and its sensitive setting close to the Conservation Area and edge of the village. The capacity is indicative and in principle a higher number of units could prove acceptable subject to careful design and layout and its impact on the Green Belt and village character. The community facilities represent only a small element of the total footprint of existing buildings and have little bearing on the overall comparison between new and existing buildings.</p>	No
<p><i>Landowners who agreed made the following comments:</i></p>			
<p>Proposal H/10:</p> <ul style="list-style-type: none"> Support for the allocation. Should the net capacity of the proposal be increased to 50 units? 		<p>No change. Support noted and welcomed. The capacity of 25-35 units is considered reasonable in the light of what is considered to be a constrained site, in order to achieve a good quality design and layout, and to ensure a reasonable level of amenities for the new residents. The Council is concerned that it would be more difficult to achieve these key objectives for schemes above the indicative capacity.</p>	No
<p>Map Book – H/2:</p> <p>Support for the proposed allocation and the planning requirements as being reasonable.</p>		<p>No change. Support for the proposal and associated planning requirements noted and welcomed.</p>	No
<p><i>Other comments from Landowners:</i></p>			
<p>-</p>			
<p>Other new sites and/or designations</p> <ul style="list-style-type: none"> Land to the east of New Road, Berkhamsted 		<p>No change. These new sites have been assessed (see Homes and Community Services Background Issues Paper), and the conclusion reached that none merit specific allocation within the Housing Schedule of the Site Allocations DPD, for the reason given in that document.</p>	No

<ul style="list-style-type: none"> Land at Denny's Lane, Berkhamsted. Button House, Pix Farm Lane, Bourne End. 		See also linked conclusions reached on changes to the Green Belt, justification for new allocations and adequacy of housing supply in Berkhamsted (and elsewhere) raised above and similar points raised to related responses in Chapter 2 - Promoting Sustainable Development. Furthermore, given the sensitivities of the Button House site, the Council feels it can be better dealt with through the Development Management process and, as such, the site is currently being explored through this route. In any event, an allocation is not required in order to bring the site forward.	
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ISSUE: Chapter 6 Housing - (b) Gypsies and Travellers			
<div>Number of people/organisations responding5</div> <div><div>Supporting -</div><div><div>Key organisations1</div><div>Individuals0</div><div>Landowners0</div><div>Total1</div></div></div> <div><div>Objecting -</div><div><div>Key organisations1</div><div>Individuals2</div><div>Landowners1</div><div>Total4</div></div></div>			
Note: Site specific issues relating to the provision of Gypsy and Traveller Sites are covered in the responses to Site Allocations Policies LA1, LA3 and LA5, and responses to the individual draft master plans.			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			
<ul style="list-style-type: none">Whether the proposed traveller sites in the Green Belt, including at proposal LA3, are appropriate development and supported by the NPPF.Whether identified need overrides the impact on the Green Belt.	S	<p>No change. The Council acknowledges the Government’s policy position that unmet need, whether for traveller sites, is unlikely to outweigh harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt. In the case of LA1 Marchmont Farm and LA3 West of Hemel Hempstead, the proposed traveller sites would not be located in the Green Belt where the sites are to be formally released through the Site Allocations DPD. The principle for this approach has been tested through and established in the Core Strategy.</p> <p>With regards to LA5, need has been identified for additional pitches that the Council is obliged to meet and there is little in the way of realistic alternative non-Green Belt locations: particularly as the Tring area is noted as a location of need in the Gypsy and Traveller Needs Assessment and it is reasonable to meet need in a planned approach with a spread of opportunities across the Borough. The Tring site is now proposed to be removed from the Green Belt (see response to Local Allocation LA5).</p> <p>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</p>	No

		<p>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 as to how many sites in reality had reasonable prospects of actually being delivered.</p> <p>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)</p> <p>Feedback on these potential sites was sought as part of Site Allocations consultation in 2008. 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: http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0</p> <p>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.</p> <p>The potential to extend the two existing Gypsy sites within the Borough has been considered and discussed with the Gypsy and Traveller Units 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. The Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the 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). The landowners have recently reiterated their objections to any extension of this site. 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.</p> <p>Other sites suggested through the Pre-Submission consultation and also submitted as having development potential through the 'call for sites' process' have also been considered and discounted as realistic or appropriate options. A fuller explanation is set out in the Homes and Community Services Background Issues Paper. The text of the September 2014 version of this document has been updated to elaborate on the explanation previously given, as a result of representations received. New sites suggested have also been appraised.</p>	
<i>Organisations who agreed made the following comments:</i>			
Chiltern District Council support the inclusion of traveller sites into major development sites as part of mixed use sites, which is supported by the Planning Policy for Traveller Sites.		No change. Support noted and welcomed.	No
Individuals			

<i>Individuals who disagreed made the following comments:</i>			
Whether the proposed location of a traveller site in the AONB as part of proposal LA5 is suitable.	S	No change. Further consideration has been given to the alternative sites put forward in the Tring area, and to the potential to explore the extension of the existing Long Marston site, as a result of objections raised. However, the Council has concluded that the LA5 site remains the most appropriate location and the designation should be retained. There are no realistic alternatives, the site would be modest in scale, and its impact can be limited by existing screening and additional landscaping. For further explanation see Response to Policy LA5 and assessment of site options in the Homes and Community Services Background Issues Paper.	No
Non Green Belt and brownfield sites would be more suitable where allocations should be made instead of at LA5.		No change. In principle, the Council accepts that this is a sensible approach to providing new pitches. In reality it has proved difficult to identify such sites and that have a reasonable prospect of being delivered and possess the associated infrastructure. Options are limited given half of the borough is covered by the Green Belt and other landscape designations, and given the competition for alternative uses of brownfield land. Not all non-Green Belt and brownfield sites are necessarily suitable for this purpose in terms of access, location, proximity to local facilities, etc. It is only in the case of LA5 that a location is identified in the Green Belt. This can, for example, help meet the need for Romany Gypsies in this part of the borough. Both of the traveller sites in connection with LA1 and LA3 will eventually be excluded from the Green Belt.	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
No reasonable alternatives for sites other than LA5 have been considered since the Scott Wilson Study (September 2006).	S	No change. See response above. All alternative sites submitted through previous consultation, and landowner promotion, have been assessed, together with the potential to extend the existing site at Long Marston. No new sites were submitted as part of the 2014 and 2015 Call for Sites exercise. See Homes and Communities Background Issue paper for further details.	No
The basis for the inclusion of traveller sites at the Local Allocations is not robust or consistent with Policy CS22 or national policy Planning Policy for Traveller Sites (PPTS).	S	No change. The Core Strategy Inspector was satisfied that the Policy CS22: New Accommodation for Gypsies and Travellers accorded with relevant Government guidance – including the NPPF and PPTS. The identification of Sites within the Site Allocations DPD in turn accords with Policy CS22. They are all well located in terms of their proximity to services and facilities, are small in scale (being less than 15 pitches in size) and are located in a dispersed pattern around settlements. They are also sites that will be clearly defined on the Policies Map (referred to in Policy CS22 and the Proposals Map). All sites have the firm support of the Gypsy and Traveller Unit at Hertfordshire County Council. See also response above	No
The proposed inclusion of traveller sites threatens the viability and delivery of LA5. Viability has not been tested through the CIL examination.		No change. LA5 is the only local allocation that has generated a landowner objection. The landowners for Local Allocations LA1 and LA3, where other traveller sites are proposed, have not raised any objections in principle to the provision of pitches within their developments. They too will also have to provide for a range of contributions towards infrastructure. This would suggest that if traveller sites are properly planned, designed and landscaped, then they can be delivered alongside the housing development and supporting infrastructure.	No

		<p>The viability report for the strategic sites (http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cd-4-strategic-site-testing-(october-2013)7461B87677FD.pdf?sfvrsn=0) included LA5 and was subject to the CIL examination. The testing assumed that 150 residential units would be provided together with 25,000 sq.ft of B2/B8. Appendix 3 in the document gives a summary of the assumed S.106 costs and there is a general cost assumption for greenfield infrastructure.</p> <p>On this basis the site was shown to be marginally unviable against the benchmark land value. It was recommended that the CIL be dropped to £140 psm rather than the £150. The sensitivity testing indicated that with modest growth in house prices the site would be viable longer term and by the indicative 2021 date. Clearly the increased capacity of up to 200 homes will be beneficial in terms of viability alongside the separation of the traveller site from the main body of housing by the proposed cemetery extension. There was no assumed reduction in house price to reflect the location of gypsy sites.</p>	
The impact of the traveller site on the Green Belt and AONB has not been considered and is contrary to national policy and the Core Strategy evidence base.		No change. See responses above.	No
Unmet need does not outweigh inappropriate development in the Green Belt.		No change. See responses above.	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No
<p><i>Other new sites and/or designations</i></p> <p>In response to representations to Policy LA5 and its draft master plan the following new sites were suggested:</p> <ul style="list-style-type: none"> • The former household waste site in Tringford Road, Tring. • Bovingdon Airfield; • Berkhamsted • Duckmore Lane, Tring <p>In response to representations to the LA3 draft master plan the Maylands Business Park area was suggested as a general location for a new site.</p>		<p>No change. See responses above regarding the suitability of LA5 as a location for a new traveller site. 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. The location also lies in the Chilterns AONB and thus will also have an impact on it. Furthermore, the Council is not aware of any landowner support for a traveller site there.</p> <p>Opportunities at Bovingdon Airfield, around Berkhamsted and in the Maylands Business Park area have 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. While they have some merit, the Council has set them aside in favour of a more planned approach to traveller provision (see 31st March 2009 Cabinet report on the consultation: http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0).</p> <p>Neither the Bovingdon Airfield nor Berkhamsted locations would help meet the needs locally arising from the Tring area. 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.</p>	No

ISSUE: Chapter 6 Housing – (c) Local Allocation LA1

Number of people/organisations responding 13

Supporting - Key organisations 2 Individuals 0 Landowners 0 Total 2 Objecting - Key organisations 3 Individuals 8 Landowners 0 Total 11			
NOTE: The majority of local residents wishing to raise concerns regarding the LA1 development did so by responding to the consultation on the draft site master plan, which ran in parallel to that for the Site Allocations DPD. Please refer to separate Report of Consultation for a summary of issues raised and the Council's response.			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
English Heritage raised concern regarding the impact of the development on local heritage: <ul style="list-style-type: none"> Site lies within 300m of Piccotts End Conservation Area on a prominent hillside location – therefore within setting of Conservation Area. Proposed 10m planted buffer on western edge of site (face of development from Piccotts End) is not sufficient – suggest 15m buffer to protect setting of Conservation Area. Dwellings should not exceed 2.5m in height in light of the above. Insufficient recognition of Conservation Area in development vision and key principles. 		<p>Change required. These concerns were raised and considered through the preparation of the Core Strategy and have therefore been taken into account by the Council and Planning Inspector when considering the suitability of this site for development. The Council recognises that it is important to minimise the impact of the development on the archaeological and heritage assets surrounding LA1. It is satisfied that these matters are appropriately recognised and addressed through Policy LA1 and in the associated master plan, particularly in considering the setting and form of the development and in protecting the character of Piccotts End, subject to a minor clarification amendment MC16 & MC17).</p> <p>A 10m buffer is considered an appropriate depth in order to safeguard the setting of the conservation area. The buffer would provide sufficient separation and screening between the development and the conservation area without the need for increasing its depth. This factor should be considered alongside the contribution from the existing landscaping within the site, the role of new planting, the need for development to follow the topography of the site, and through careful design and layout of the new housing.</p> <p>In terms of buildings heights, whilst it is envisaged that the majority of the development will be two storey in height, it is reasonable to have some limited taller elements to add visual and design interest within the development, but only where this is appropriate taking account of site topography. The Council does not want to hinder innovative designs by limiting heights to 2 ½ storeys only. It is however accepted that this issue would benefit from clarification. The 'Key Development Principles' section of Policy LA1 currently has two separate requirements relating to design. These are as follows:</p> <ul style="list-style-type: none"> “Deliver a mix of two storey and three storey housing including 40% affordable homes; and Limit buildings to two storeys, except where a higher element would create interest and focal points in the street scene.” <p>It is accepted that a clearer wording would be as follows:</p> <ul style="list-style-type: none"> “Deliver a mix of housing, including 40% affordable homes (MC16); and Limit buildings to two storeys, except where a higher element would create interest and focal points in the street scene and is appropriate in terms of topography and visual impact (MC17).” 	MC16 MC17

		<p>The wording of the draft master plan should also be amended to reflect these changes. The master plan elaborates on these principles by stating that <i>“The issue of the development’s visibility should be mitigated by careful siting of taller buildings and prominent roof forms to parts of the site that are more discreet, such as those at lower levels.....”</i></p> <p>The design and layout of the new development will also have to accord with the design policies of the Core Strategy, which cover a range of geographical scales from ‘Quality of Settlement Design (Policy CS10), to ‘Quality of Neighbourhood Design’ (Policy CS11) and ‘Quality of Site Design’ (Policy CS12). These policies require consideration to be given to key issues such as protection and enhancement of significant views, reinforcing topography and taking account of more detailed factors such as the scale, height and bulk of individual buildings.</p>	
<p>Piccotts End Residents Association raised concerns regarding:</p> <ul style="list-style-type: none"> • No detail of traffic management – high levels of traffic anticipated on Link Road and need for pedestrian crossing. • Flooding at Piccotts End and SUDs provision on site not considered adequate. • Use of Howe Grove for a roundabout. 		<p>Change required. The Local Highway Authority (Hertfordshire County Council) has been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised, although it is acknowledged by the Council that some local highways improvements and mitigation measures will be required relating to specific site proposals, including LA1.</p> <p>For Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model (Paramics model). This model is managed by specialist transport consultants on behalf of Hertfordshire County Council. A number of model runs have been undertaken throughout the preparation of the Core Strategy and Site Allocations DPDs to ensure that the most up-to-date information regarding the scale and location of new development within the town is reflected, including local allocations LA1, LA2, and LA3. These are as follows:</p> <ol style="list-style-type: none"> 6. 2008 base model (May 2009). 7. ‘Do minimum’ models for 2021 and 2031- accompanied by a Future Years Issues Report (May 2009). 8. LDF Option Test Western Hemel (August 2010). 9. Combined Local Plan Test (July 2012). 10. Morrisons Development Test (Summer 2013). <p>In addition to the above a further model run was carried out in March 2015 to ensure that there had been no material change in circumstances since 2013 and to help inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Local Highway Authority have advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.</p> <p>In addition to transport modelling, specific traffic studies have been prepared for Local Allocations LA1. The latest transport assessment was published in November 2014: http://www.dacorum.gov.uk/docs/default-source/strategic-planning/la1-transport-strategy-141107-final.pdf?sfvrsn=0</p> <p>This has taken account of the Transport Model and agreed with the Local Highway Authority. Any necessary highway improvements are referred to in Policy LA1 in the Site Allocations document, and elaborated in the site master plans. The Local Highway Authority has confirmed through their representations that they support its content.</p> <p>For LA1, detailed highway issues will be considered as part of the planning application process, for which the Local Highway Authority are statutory consultees. Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements. LA1 will need to ensure it achieves good pedestrian links to key facilities. These will be explored through a more detailed transport strategy as the proposal is advanced.</p> <p>The proposed main vehicular access onto the A4147 Link Road opposite Howe Grove is logical. It is the only viable</p>	<p>MC19 MC20</p>

		<p>location for the main vehicular access based on the information available and is supported by the Local Highway Authority. Its impact on Howe Grove is expected to be minimal, as it will not require any land-take for this side of the road. Furthermore a roundabout or access point in this location will also have the benefit of reducing traffic speeds on the link road, which are currently high.</p> <p>The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy. The SuDS feature shown on the concept plan to LA1 is indicative only. Surface water drainage will be considered in detail, including the implementation of appropriate SuDS measures where technically feasible, alongside the planning application for the new homes. Further advice will be taken from the Local Lead Flood Authority (LLFA), as well as the Environment Agency, as part of pre-application discussions. ,</p> <p>Since publishing the Pre-Submission version of the Site Allocations document the Government has confirmed a change in approach to how development schemes will be assessed. Rather than a dual system where the local planning authority (LPA) and the SuDS Approval Body (SAB) consider the planning application separately, SuDs issues will now be dealt with through conditions attached to any planning permissions, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. A minor change is required to the text of the 'Delivery and Phasing' section of the policy to ensure references are made to the correct advisory bodies (MC20). Similar amendments will also be required to the master plan.</p> <p>Amend planning requirements for LA1 to require early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site (MC19).</p>	
<p>CPRE:</p> <ul style="list-style-type: none"> LA1 should be subject to outcome of SHMA, SHLAA and early partial review of Core Strategy. 		<p>No change. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the results of the technical work underpinning the content of any future Local Plan. The Core Strategy provides the strategic context for the Site Allocations DPD, including the local allocations, and it must have regard to this. The level of housing and need for the local allocations was tested through examination of the Core Strategy by an independent Planning Inspector. In finding the Core Strategy sound, the Inspector accepted the Council's approach to housing and the local allocations. Therefore, the principle of releasing land from the Green Belt through the local allocations has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered. This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council.</p>	No
Organisations who agreed made the following comments:			
<p>Thames Water support the Policy but note:</p> <ul style="list-style-type: none"> Current waste water network may not be able to support the demand from this development – developer required to complete drainage strategy to identify necessary infrastructure upgrades. Use of Grampian planning condition to ensure appropriate infrastructure in place prior to occupation. 	S	<p>Change required. With regard to the Local Allocation, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific amendments to the text of the Site Allocations document with regard to the Local Allocations.</p> <p>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers of some larger schemes at the planning application stage. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. In the light of this experience, the landowners / developers of the Local Allocations have been advised to liaise with Thames Water at an early stage when drawing up their detailed schemes. The delivery and phasing section of each of the Local Allocation policies explicitly refers to the need for <u>'Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewage treatment capacity is available to support</u></p>	MC19 MC20

		<p><i>the timely delivery of this site’</i> (MC19). “ This requirement is reiterated within the associated master plan. If any more specific upgrade requirements are identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues, these will be reflected in the text of the master plans and/or the requirements passed through to developers at the pre-application stage.</p> <p><i>See also response to Chapter 18 – Monitoring.</i></p> <p>A related change covering Sustainable Drainage requirements is also needed to ensure the text reflects recent changes in responsibilities (MC20).</p>	
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Sufficient new homes created through prior approvals of office to residential conversions. Housing demand estimates do not take account of conversions.		<p>No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of ‘brownfield’ sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document which has then been updated each year as part of the Council’s annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council’s website and formed part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough’s future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council’s Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations,</p>	No

		<p>which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>Given the above points, the Council considers that Local Allocation LA1 (and the other Local Allocations) remains an essential part of the housing programme and must be retained.</p>	
Increased traffic locally and failure to take account of cumulative traffic from LA1 and LA3; and lack of adequate road infrastructure.		No change. See response to highway concerns raised by the Piccotts End Residents Association above.	No
Planning Policy Statement for Traveller Sites may affect number of required pitches.		No change. The Council will need to consider the implications of such Government advice it has previously consulted on, when it is formally issued. It cannot act on advice that has not yet been published. A decision will be taken at that time regarding the need to review the traveller needs assessment as a consequence of any change in approach at national level.	No
Increase in number of new homes to be provided from 300-350 and there is now inclusion of traveller site.		<p>Change required. An estimate of site capacities for the Local Allocations was established through the Core Strategy. These estimates were based on prevailing densities and the area of the site, and tempered by local infrastructure considerations. It is appropriate to make effective use of land if it is to be released from the Green Belt in order to minimise the scale of releases required. Following more detailed technical work carried out as part of preparing draft master plans, some site capacities have been adjusted to reflect the availability of further information about the amount of land available for development and/or the expected configuration of uses within a site. Overall this does marginally increase the level of housing supply proposed across the Local Allocations as opposed to the levels indicated in the Core Strategy. It is important to note that this work has indicated that the capacity of one site (LA4) should be reduced. None of the issues raised through the Pre-Submission Site Allocations or draft master plan consultation indicate that the current capacity figures should be amended. The final capacity of all Local Allocations will be tested via the planning application process. This application process will include further public and stakeholder consultation.</p> <p>While a traveller site at LA1 was not expressly referred to in the Core Strategy, the Council's approach has always been to accommodate new traveller sites as part of planned new, larger housing development. The background to this is set out in more detail in paras. 4.19-4.29 of the Providing Homes and Community Services (September 2014) background paper: http://www.dacorum.gov.uk/docs/default-source/strategic-planning/issues-paper-providing-homes-community-services-sept-2014.pdf?sfvrsn=0</p> <p>As one of the larger housing sites, Local Allocations LA1 provides an opportunity for the specific accommodation needs of Gypsies and Travellers. This approach is reasonable given the lack of realistic alternatives available and in order to provide greater certainty over delivery and in meeting identified need. The location was previously identified through the Scott Wilson Report (2006) as an opportunity for a new site. In addition, the statement of common ground between the Council and LA1 landowners issued during the preparation of the Core Strategy in support of the proposal, made clear the potential for the development to accommodate a traveller site (para. 3.6): <i>"All parties acknowledge the Councils and HC's position that the local allocation may need to accommodate a small</i></p>	MC18

		<p><i>number of pitches for travellers, in addition to housing. The area was identified as a potential location, together with others, in the Scott Wilson Report. The Council expects any decision to be taken in the light of an updated Gypsy and Traveller Accommodation Assessment and further consideration and examination through the Site Allocations DPD.”</i></p> <p>See also the response to Gypsy and Traveller issues raised under Chapter 7 – Meeting Community Needs.</p> <p>A change is however required on a related matter. The Council is keen to ensure delivery of a comprehensive form of development and associated works (such as foul water drainage) and other contributions. This can be difficult to achieve where a scheme involves a series of landowners, such as at LA1. The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). The Council considers a further related update to the policy is required to cover this matter alongside changes to the master plan. Local Allocations LA3, LA4 and LA5 are also in multiple ownerships. Policies LA3, LA4 and LA5 and their master plans should be similarly amended to ensure a consistent approach across schemes towards achieving comprehensive development.</p> <p><i>See also response to issues raised in response to Chapter 6 – Gypsies and Travellers.</i></p>	
No consideration given to the impact of flooding and adequacy of storm drains to cope with 350 homes. Piccotts End suffers with flooding already.		<p>No change. It is considered that this issue is already sufficiently covered within both Policy LA1 and the associated master plan.</p> <p><i>See response to issues raised by the Piccotts End Residents Association above.</i></p>	No
Heritage impact (i.e. Piccotts End Conservation Area) has not been considered – no heritage appraisal.		<p>No change. It is considered that this issue is already sufficiently covered within both Policy LA1 and the associated master plan.</p> <p><i>See response to issues raised by English Heritage above.</i></p>	No
Impact on the visual amenity of residents at Piccotts End (<i>presuming adverse</i>) which would be emphasised by the topography of the site. Location of the traveller site on western edge would also stress this visual impact.		<p>No change. It is important to minimise the impact of the development on Piccotts End and this issue was considered as part of the Core Strategy process. The Council is satisfied that these matters are suitably highlighted and can be addressed through Policy LA1 and in the associated master plan, particularly in considering the setting and form of the development and in protecting the character of Piccotts End. An appropriate landscape buffer will be secured in order to better screen the development from the hamlet. Its impact will also be lessened by the contribution from the existing landscaping within the site, the role of new planting, the need for development to follow the topography of the site, and through careful design and layout of the new housing.</p>	No
No requirement in NPPF to build on Green Belt to meet 5-year housing land supply.		<p>No change. The principle of removing land from the Green Belt (via the Local Allocations sites) was tested and established through the Core Strategy. The role of the Site Allocations is to take forward this approach and to make the actual changes to the Green Belt boundaries that will enable this development to go ahead.</p> <p>When drawing up the Core Strategy the Council had to ensure that it reflected guidance on the Green Belt and other matters set out in the National Planning Policy Framework (NPPF). This was tested as part of the Examination process and the plan found 'sound.'</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Council's review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy.</p> <p>The Local Allocations identified within the Core Strategy remain the only housing sites identified for release from the Green Belt.</p> <p><i>See also responses to Chapter 2 – Green Belt and Chapter 6 – Housing.</i></p>	No

Proposals not compliant with national planning policy re construction of new homes in Green Belt – a brownfield site near M1 would be more appropriate.		<p>No change. The Council has taken time and care to identify what are considered, on balance, to be the most appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF). This requires, amongst other things, for Councils to <i>‘positively seek opportunities to meet the development needs of the area’</i> (para 14); and <i>‘boost significantly the supply of new housing’</i> (para 47).</p> <p>The decisions made regarding both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector’s Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector’s main concern when weighing up whether or not to find the Core Strategy ‘sound’ or not, was if the Council had allocated <i>sufficient</i> land for housing, not if any of the Green Belt sites should be removed from the plan.</p> <p>The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area’s objectively assessed need.</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy.</p> <p>Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to <i>“significantly boost the housing supply”</i> (para. 47). In considering these points, Councils are expected to meet their <i>“objectively assessed needs”</i> for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.</p> <p>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council progresses the Site Allocations DPD.</p> <p><i>See also responses to Chapter 2 – Green Belt and Chapter 6 – Housing.</i></p>	No
Individuals who agreed made the following comments:			
-		N/A	No
Landowners			
Landowners who disagreed made the following comments:			
-		N/A	No
Landowners who agreed made the following comments:			

-		N/A	No
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ISSUE: Chapter 6 Housing – (d) Local Allocation LA2			
<div>Number of people/organisations responding6</div> <div><div>Supporting -</div><div><div>Key organisations2</div><div>Individuals</div><div>Landowners</div><div>Total2</div></div></div> <div><div>Objecting -</div><div><div>Key organisations2</div><div>Individuals</div><div>Landowners2</div><div>Total4</div></div></div>			
NOTE. The majority of local residents wishing to raise concerns regarding the LA2 development did so by responding to the consultation on the draft site master plan, which ran in parallel to that for the Site Allocations DPD. Please refer to separate Report of Consultation for a summary of issues raised and the Council’s response.			
Issue / Summary of Comment	New / Significant	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			
Object to principle of development – LA2 and GB/2 amendment should be subject to a Strategic Housing Market Assessment, review of the Strategic Housing Land Availability Assessment and review of the Core Strategy, to reveal the true extent of housing need and supply.		<p>No change. The Council has taken time and care to identify what are considered, on balance, to be the most appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF). This requires, amongst other things, for Councils to ‘<i>positively seek opportunities to meet the development needs of the area</i>’ (para 14); and ‘<i>boost significantly the supply of new housing</i>’ (para 47).</p> <p>The decisions made regarding both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector’s Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector’s main concern when weighing up whether or not to find the Core Strategy ‘sound’ or not, was if the Council had allocated <i>sufficient</i> land for housing, not if any of the Green Belt sites should be removed from the plan.</p> <p>The principle of releasing land from the Green Belt and bringing forward this site for housing and associated uses has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p>	No
Insufficient justification to release Green Belt land at LA2 in accordance with Site Allocations Policy SA1.		<p>No change. The principle of removing land from the Green Belt (via the Local Allocations sites) was tested and established through the Core Strategy. The role of the Site Allocations is to take forward this approach and to make the actual changes to the Green Belt boundaries that will enable this development to go ahead.</p> <p>When drawing up the Core Strategy the Council had to ensure that it reflected guidance on the Green Belt and other matters set out in the National Planning Policy Framework (NPPF). This was tested as part of the Examination</p>	No

		<p>process and the plan found 'sound.'</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy and continues to do through its Site Allocations document.</p> <p>The Local Allocations identified within the Core Strategy remain the only proposed housing sites identified for release from the Green Belt.</p>	
Policy LA2 states incorrectly that LA2 has already been released from the Green Belt.		No change. The Green Belt boundary will not be changed until the Site Allocations document is adopted. However, the Pre-Submission version of the Site Allocations shows the text that the Council is proposing in the adopted plan.	No
<p>Concern that the LA2 development would harm the historic character of the Old Town Conservation Area, although the key development principles and LA2 Draft Master Plan go some way to addressing this concern and mitigating the impact of the development (e.g. by retaining trees and some open space at the southern end of the site). Particular concerns:</p> <ol style="list-style-type: none"> 1. The view of the listed church spire from Fletcher Way near the junction with Piccotts End Road should be retained. 2. The steepness of the slope may warrant complex split-level forms in some areas, so guidance should be given on overall height to ridge and eaves from ground level 3. Not convinced there should be any buildings over two storeys, except perhaps at the top of the hill on the south side of the site. Townscape variations can be delivered by subtle variations in the architectural treatment of the elevations. 4. Principle 5 should be extended to read <i>"and not be harmful to the historic environment"</i>. 		<p>Point 1: No change. Key Development Principle already provides sufficient guidance. However, it is proposed to amend the LA2 Draft Master Plan to refer to the need to retain this view of the church spire.</p> <p>Point 2: No change , but amend the LA2 Draft Master Plan to refer to the possibility of split-level homes and provide guidance on maximum eaves and ridge heights.</p> <p>Point 3: Change required. Amend Principle 5 as proposed in the representation (see point 4 below). Also, amend the Draft Master Plan as proposed in point 2 above and to state that taller buildings would need to demonstrate that no harm would be caused to the setting of designated heritage assets in the Old Town.</p> <p>Point 4: Change required. Amend Principle 5 as proposed in the representation.</p>	<p>No</p> <p>No</p> <p>MC21</p> <p>MC21</p>
<i>Organisations who agreed made the following comments:</i>			
Support for retained green infrastructure and positive effects identified in the Sustainability Appraisal.		No change. Support noted.	No
Bullet point 6 (sewage and sewage treatment capacity): Thames Water comment re 'no objection but concerns about capacity - new and upgraded drainage infrastructure is likely to be needed ahead of the development. A Drainage Strategy will be needed to identify what is required – this may delay the development, but the developer could requisition the infrastructure to deliver it sooner. A Grampian condition may be needed to ensure the infrastructure is in place ahead of occupation of the development.	S	<p>Change required. Minor change required to add reference to specific housing proposals regarding the need for early liaison required with Thames Water to develop necessary Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of the site. Also, amend bullet 7 (sustainable drainage) to reflect the changes made by the Government to the regime for obtaining approval for sustainable urban drainage systems (SuDS).</p> <p>A series of meetings have been held to discuss issues regarding waste water and sewerage issues with Thames Water (together with the Environment Agency) in early 2015. With regard to the Local Allocations, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific</p>	<p>MC22</p> <p>MC23</p>

		<p>amendments to the text of the Site Allocations document with regard to the Local Allocations.</p> <p>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers at the planning application stage for larger sites or those located in areas of existing sewerage / waste water constraint. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. In the light of this experience, the landowners / developers of the Local Allocations have been advised to liaise with Thames Water at an early stage when drawing up their detailed schemes.</p> <p>The proposed revised text for bullets 6 and 7 will also be supported by more detailed text in the LA2 Master Plan. If any more specific upgrade requirements are identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues, these will be reflected in the text of the finalised master plan and/or passed through to developers at the pre-application stage.</p> <p>A short Advice Note entitled 'Planning Requirements for Waste Water Infrastructure Issues in Dacorum' has also been prepared and placed on the Council's website. This advises developers of the requirement for the above sites, sets out what a Drainage Strategy should cover and provides contact details should further advice be required from Thames Water.</p> <p>Where necessary the Council will impose Grampian Conditions to ensure sewerage and waste water issues are appropriately addressed.</p> <p>A related change covering Sustainable Drainage requirements is also needed to ensure the text reflects recent changes in responsibilities (MC23).</p>	
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Conflict with NPPF / Government policy and recent ministerial statements on Green Belt protection	S	<p>No change. The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area's objectively assessed need.</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy. A key role of the Site Allocations DPD is to take forward the strategic policies and targets relating to housing within the Core Strategy and ensure that these are delivered on the ground. It is the role of the early partial review (in the form of a new single Local Plan) to look again at longer term needs and take account of a whole range of Government policies and guidance, including those relating to the Green Belt.</p> <p>Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to "<i>significantly boost the housing supply</i>" (para. 47). In considering these points, Councils are expected to meet their "<i>objectively assessed needs</i>" for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.</p> <p>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making (planning application) rather than the plan-making process. The changes do not affect how we implement plans that are already adopted, such as our Core Strategy and associated proposals that it contains.</p> <p>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council</p>	No

		progresses the Site Allocations DPD.	
Brownfield land, office to residential conversions and PDL should be used before releasing Green Belt sites for housing		<p>No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of 'brownfield' sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be robust and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add flexibility to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p>	No
The Site Allocations document is not effective because the resultant increase in traffic from the local allocations has not been planned for.		<p>No change. Both the Highway Authority (Hertfordshire County Council) and the Highways Agency (now called Highways England, who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by either party, although it is acknowledged by the Council that some local highways improvements and mitigation measures will be required</p>	No

		<p>relating to specific site proposals.</p> <p>For Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model. This computer model is managed by specialist transport consultants on behalf of Hertfordshire County Council.</p> <p>The work done in 2008 by the Highway Authority in analysing the traffic issues of Hemel Hempstead are set out in the Hemel Hempstead Urban Transport Plan. Development north of the Old Town was envisaged and considered in that study. The Plan can be read/ downloaded at http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/HHUTP/.</p> <p>A number of model runs were undertaken between 2009 and 2013 during the preparation of the Core Strategy and Site Allocations DPDs to ensure that the most up-to-date information regarding the scale and location of new development within the town was reflected.</p> <p>A further model run was carried out in March 2015 to ensure that there had been no material change in circumstances since 2013 and help inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Highway Authority have advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.</p> <p>For all development sites, detailed highway issues will be considered as part of the planning application process through a Transport Assessment, for which the Highway Authority are statutory consultees. Section 7 in the LA2 Draft Master Plan already states that local junction improvements may be required, as advised by the Highway Authority. Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements.</p>	
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

ISSUE: Chapter 6 Housing – (e) Local Allocation LA3			
Number of people/organisations responding 14			
Supporting -			
Key organisations	3		
Individuals	0		
Landowners	2		
Total	5		
Objecting -			
Key organisations	2		
Individuals	5		

Landowners	2		
Total	9		
NOTE. The majority of local residents wishing to raise concerns regarding the LA3 development did so by responding to the consultation on the draft site master plan, which ran in parallel to that for the Site Allocations DPD. Please refer to separate Report of Consultation for a summary of issues raised and the Council's response.			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
<p>The extent the development addresses concerns over:</p> <ul style="list-style-type: none"> • The lack of reference to archaeology, listed buildings and the Conservation Area and associated requirements within Policy LA3; • The impact on the character and appearance of the Winkwell Conservation Area; • The lack of detail over the width and timing of planting of the tree belt; • The need for additional open space to separate the development from Winkwell Conservation Area 		<p>Change required. The Council recognises that it is important to minimise the impact of the development on the archaeological and heritage assets surrounding LA3. Many of these points are already covered in the master plan that accompanies the Site Allocations DPD. While it is not necessary for Policy LA3 to cover all matters in detail (as this is the role of the master plan) it is appropriate that some direct reference is made to considering these factors. The policy should be amended to include as a new development principle regarding the need to safeguard these heritage assets. The master plan will need to be similarly updated.</p> <p>The Council accepts the need to safeguard the character and appearance of the Winkwell Conservation Area in making the above changes. However, it considers the structural tree belt would provide sufficient separation and screening between the development and the Conservation Area without the need for additional open space.</p> <p>The Council also accepts the important role the tree planting will have on limiting the impact of the development. However, the timing and width of the planting is too detailed a matter for either the policy or master plan to deal with at this early stage in the planning process. This can be pursued in progressing towards a planning application. Nevertheless, the master plan (paragraph 6.7) does recognise the need for advanced structural planting to enable a mature landscape to establish in advance of any development.</p>	MC24
Should LA3 be further justified against the perceived housing need through an update of the SHMA and SHLAA and review of the Core Strategy?		<p>No change. The strategic context for the local allocations is provided by the Core Strategy and the Site Allocations DPD must have regards to this. The level of housing and need for the local allocations was tested through examination of the Core Strategy by an independent Planning Inspector. In finding the Core Strategy sound, the Inspector accepted the Council's approach to housing and the local allocations. Therefore, the principle of releasing land from the Green Belt through the local allocations has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p> <p>This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes Ltd vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council). These decisions clarify a number of key points, including:</p> <ul style="list-style-type: none"> • A 'Local Plan' can comprise a series of DPDs. Dacorum's Site Allocations DPD is in-effect a 'daughter document' to the Core Strategy and as such does not require a new assessment of objectively assessed needs (OAN) to be carried out; • Councils should continue with the preparation of Site Allocations DPDs even where they do not deliver the full OAN figure for the area. • The role of the Site Allocations DPD is to set out how the development targets set out in the Core Strategy will be delivered: not to reassess what these targets should be. • That in Dacorum's case, housing delivery is only expected to fall short of delivering full OAN in the latter part of the plan period, by which time a new Local Plan (via the early partial review) will be in place and will have reconsidered appropriate targets. <p>In the light of these decisions the approach taken by the Council to the Site Allocations DPD is considered to be both appropriate and legally compliant.</p>	No

		This is reinforced by the fact that Dacorum's own Core Strategy Inspector was happy with the wording in paragraph 29.8 (introduced via a post Examination main modification) that " <i>The Council is committed to a partial review of the Core Strategy (i.e. after completion of the Site Allocations and Development Management DPDs. Evidence gathering will begin in 2013. The purpose of the review is to reconsider housing need and investigate ways of meeting that need more fully.</i> "	
Concerns regarding the adequacy and suitability of Green Infrastructure on the site, especially: <ul style="list-style-type: none"> The extent the allocation mitigates against the loss of open habitats. The suitability of the green corridor to provide a robust and functional link to Shrub Hill Common Nature Reserve. 		<p>No change. The Council accepts the importance of LA3 in offsetting some of the loss of existing open habitats and maintaining a robust and functional link to Shrub Hill Common Local Nature Reserve. As a general approach the development will offer significant levels of open space. An alternative north-south green corridor would be disrupted by the extension of The Avenue as one of the two main access points into the development. The access is essential and there are no logical alternatives. Any substantial enlargement of the current proposed green corridor/tree belt could reduce the capacity of the scheme and potentially affect its viability and/or the delivery of key contributions. Furthermore, a reduced east-west corridor could have an impact on the strategic landscaping setting for the new development contrary to other objectives in the policy and master plan.</p> <p>Recent discussions have taken place with the County Council's Ecology advisor over the suitability, form, and role of the green corridors and other green infrastructure. The County Council acknowledge that both the north-south and east-west corridors have advantages and disadvantages as proposed extensions to Shrubhill Common. On balance, they are satisfied that an east-west corridor is appropriate 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. In addition, it recognises that any new development should maintain a sensitive relationship to the existing north-south green corridor. These points can be reflected in amendments to the master plan.</p>	No
Organisations who agreed made the following comments:			
Support for the proposal to deliver new playing fields as identified in the Council's leisure space study.		No change. Support noted and welcomed. However, the contribution towards senior formal playing pitches is likely to be limited given the topography of the site and the need to re-grade land (see paragraph 5.8 of the master plan).	No
Thames Water is concerned over the current capacity of the waste water network to support LA3. There is a need for a Drainage Strategy and potentially new and upgraded drainage infrastructure.	S	<p>Change required. With regards to the level of development sought, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific amendments to the text of the Site Allocations document with regard to the Local Allocations.</p> <p>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers of some larger schemes at the planning application stage. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. Therefore, it is considered appropriate to add a short reference to the planning requirements to refer to the need for liaison with Thames Water and the potential requirement for specific technical work to be carried out to assess capacity issues. This will allow flexibility at the pre-application stage should any more specific upgrade requirements be identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues.</p> <p>Amend planning requirements for LA3 to require early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</p> <p>Related to the issue of waste water is sustainable drainage. This issue and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations are already highlighted within the Delivery and Phasing section of each relevant policy. However, since publishing the Pre-Submission version of the Site Allocations document the Government has confirmed a change in approach to how development schemes will be assessed. Rather than a dual system when the local planning authority consider the planning application and the SuDS Approval Body (SAB), SuDs issues will now be dealt with through conditions on planning applications, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. A minor change is required to the text of the 'Delivery and Phasing' section of the policy to ensure references are made to the correct advisory bodies. Similar amendments will also be required to the master plan.</p> <p>The Council is keen to ensure delivery of a comprehensive form of development and associated works (such as foul</p>	MC25 MC26

		water drainage) and other contributions. This can be difficult to achieve where a scheme involves a series of landowners, such as at LA3. The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). The Council considers a further related update to the policy is required to cover this matter alongside changes to the master plan. Local Allocations LA1, LA4 and LA5 are also in multiple ownerships. Policies LA1, LA4 and LA5 and their master plans should be similarly amended to ensure a consistent approach across schemes towards achieving comprehensive development.	
Support for retained green infrastructure, mitigation for the visual impact on the landscape, and the positive effects identified in the Sustainability Appraisal.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Whether the policy is counter to the approach to the Green Belt set out in the NPPF / Ministerial Statement and its justification under very special circumstances.	S	<p>No change. The strategic context for the local allocations is provided by the Core Strategy and the Site Allocations DPD must have regards to this. The level of housing and need for the local allocations was tested through examination of the Core Strategy by an independent Planning Inspector. In finding the Core Strategy sound, the Inspector accepted the Council's approach to housing and the local allocations. Therefore, the principle of releasing land from the Green Belt through the local allocations has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p> <p>See also response to Chapter 6 – Housing for more detailed response to the issues of the role of the Green Belt sites in meeting housing need.</p>	No
Does the perceived need for the local allocation satisfactorily take account of significant future windfalls such as conversions from offices?		No change. See response to Chapter 6 – Housing for more detailed response to the issues of windfalls in meeting housing need.	No
The level of consideration given to access (at 2 points only).		No change. The two principal access points at Long Chaulden and The Avenue are logical and appropriate to serve the development. They are supported by technical work and the views of the local Highway Authority (HCC Highways). There are limited and viable alternative access arrangements available. Alternative access from the existing Chaulden Vale neighbourhood and Pouchen End Lane is poor and constrained, and is unsuitable to access the proposal. Chaulden Lane is also constrained but could provide for an emergency access and direct access to the proposed traveller site.	No
The impact of the proposal on the local road network.		<p>No change. The Council acknowledges the need to have an up to date understanding of the implications of new development on the strategic and local road network. It is important we have continuing liaison with the main transport agencies.</p> <p>Both the local highway authority (Hertfordshire County Council) and the Highways Agency (now called Highways England - who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by either party, although it is acknowledged by the Council that some local highways improvements and mitigation measures will be required relating to specific site proposals. The Council is not proposing growth in the Site Allocations document above the level set out in the Core Strategy. The evidence base reflects this position (see below). Improvements have already been identified in order to accommodate the growth. The technical transport work is on-going, particularly as we take forward work on the new Local Plan, and additional transport assessments will be required for the larger sites at the appropriate time.</p> <p>For Hemel Hempstead the consideration of highway issues has reflected outputs from the Hemel Hempstead Transport Model (Paramics model). This model is managed by specialist transport consultants on behalf of Hertfordshire County Council.</p>	No

		<p>A number of model runs have been undertaken throughout the preparation of the Core Strategy and Site Allocations DPDs to ensure that the most up-to-date information regarding the scale and location of new development within the town is reflected. These are as follows:</p> <ol style="list-style-type: none"> 11. 2008 base model (May 2009). 12. 'Do minimum' models for 2021 and 2031- accompanied by a Future Years Issues Report (May 2009). 13. LDF Option Test Western Hemel (August 2010). 14. Combined Local Plan Test (July 2012). 15. Morrisons Development Test (Summer 2013). <p>In addition to the above a further model run was carried out in Spring 2015 to ensure that there had been no material change in circumstances since 2013 and help inform decisions regarding any changes that may need to be made to the Site Allocations DPD (and associated Local Allocation master plans) to take account of concerns raised through representations. The Highway Authority have advised that the 2015 model outputs indicate that there has been no material change in highway conditions since the Site Allocation Pre-Submission document was prepared and that there are no issues highlighted that cannot be ameliorated through appropriate mitigation.</p> <p>In addition to transport modelling, specific traffic studies have been prepared for Local Allocations LA1 and LA3. These have taken account of the Transport Model and agreed with the Highway Authority. Any necessary highway improvements are referred to in the relevant Local Allocations policies of the Site Allocations document, and elaborated in the site master plans. The Highway Authority has confirmed through their representations that they support the content of all. Movement issues were considered in detail through technical work on LA3. The matter is sufficiently covered in Policy LA3 / master plan and the need for on and off-site improvements and other sustainable transport measures identified. Acknowledge the need for on-going technical work and liaison with the local Highway Authority (HCC Highways). The wider impact of the local allocations (and other housing development) in Hemel Hempstead on the road network has been considered through an updated transport model run (2014 model year) of the town (as referred to above). It has helped predict future demand and potential capacity issues on the network and the need for associated road improvements.</p> <p>The level of detail in the LA3 master plan is sufficient at this early stage to identify key transport and other improvements required by the new development. This makes clear what is needed at later stages to allow for appropriate highway improvements and mitigation measures to be secured through developer contributions and agreements. The master plan is supported by a range of technical work, including highway matters. The local highway authority (Hertfordshire County Council) has been consulted on the local allocations throughout preparation of the Core Strategy and Site Allocations DPDs and support the content of these documents. They have been satisfied over the ability in each case of the overall road network to cope with the scale of new development proposed and the nature and suitability of highway works necessary. Liaison with the County Council is on-going. More detail over the timing and type of works required will emerge as schemes are advanced.</p> <p>For further information regarding technical work please see the transport section of the Sustainable Development Strategy Background Issues Paper.</p>	
<p>Local infrastructure is insufficient to serve the development in terms of:</p> <ul style="list-style-type: none"> • Schooling; • NHS service provision; • Drinking water 		<p>No change. As part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an Infrastructure Delivery Plan (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors' surgeries was provided by the Clinical Commissioning Group.</p> <p>The InDP is updated regularly (usually on an annual basis). The current (2015) update has been timed to take account of concerns regarding infrastructure issues raised through the Site Allocations Pre-Submission consultation and provide an opportunity to discuss these further with providers. This revised version of the InDP will accompany</p>	No

		<p>the Submission version of the Site Allocations DPD. This update will ensure key infrastructure concerns are raised with providers and any necessary amendments made to the DPD and accompanying Local Allocation master plans to ensure these are properly addressed.</p> <p>In consulting over proposed new development, no objections were raised by the utility providers in principle to the level of housing development identified in the Core Strategy or to the local allocations. The Council recognises the continuing need for on-going technical work and liaison with respective providers. This matter is sufficiently covered in the master plan and the need for contributions towards and timely provision of infrastructure improvements acknowledged.</p> <p>Hertfordshire County Council (HCC) is satisfied that the need for additional primary school places has been addressed through future provision of a new primary school within the allocation. Existing secondary schools can accommodate potential pupil growth. Acknowledge the need for on-going liaison with HCC over planning for future secondary school places in the town.</p> <p>Decisions on the level of provision of local hospital services are the responsibility of the NHS/Hospital Trust. The Council accepts the need for on-going liaison with them, especially in connection with the future of the existing hospital site (Proposal MU/2). Policy LA3 and draft master plan highlight the importance of supporting improved GP services either financially or within the new neighbourhood. Decisions have not been made over exactly how future surgery needs will be accommodated. Discussions are on-going with the NHS / CCG.</p> <p>The Council has and continues to liaise closely with Thames Water on potable and waste water supply issues. It is recognised that the proposal may need to provide for additional infrastructure capacity, but the provision of a temporary on-site waste water packaged treatment facility does provide flexibility in the interim. The provision of a range of water-saving measures in the new homes (Policy CS29) can help reduce general water consumption.</p>	
<i>Individuals who agreed made the following comments:</i>			
The suitability of Chaulden Lane to serve the traveller site.		No change. The local highway authority has accepted the general principle of access arrangement from Chaulden Lane to serve the traveller site. In reality, the level of traffic generated from the site is likely to be low. It is not always possible to locate traveller sites with ready access on to main roads given the difficulty of securing a location for new pitches.	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
Support principles of allocating the proposal, the two principal access points from The Avenue and Long Chaulden Lane and the unsuitability of Chaulden Lane, Pouchen End Lane and residential roads to the east of LA3 to serve the development.		No change. Support noted and welcomed.	No
Whether Pouchen End hamlet should be excluded from the LA3 proposal area?		Change required. The hamlet has been identified in error as part of proposal LA3 within the Site Allocations DPD map book (page 74). It should be amended to remove the hamlet.	MC27
Should the policy enable occupation of the new homes before 2021 if needed?		<p>No change. The Core Strategy envisaged all six Local Allocations being delivered from 2021 onwards and phasing continues to be justified. There have been no significant changes in circumstances since the adoption of the Core Strategy and in consulting on the Site Allocations DPD, to justify bringing forward this allocation sooner. Policy CS3 provides sufficient flexibility for this to happen, if required. However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that an application for this site 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. This approach is considered to remain appropriate and will ensure that the Council can continue to demonstrate a 5 year housing land supply as required by the NPPF. This approach is consistent with the wording of paragraph 6.28 of the Core Strategy.</p> <p>In terms of Hemel Hempstead itself, there are significant housing opportunities within the town in the short to medium</p>	No

		term without the need for LA3. See also response to Chapter 6: Homes	
Does Policy LA3 adequately explain the delivery of the proposal?		No change. The background to Policy LA3 (paragraph 6.28) already acknowledges the need for a lead in period and early submission of applications, and advanced preparatory works in order for practical delivery/occupation of new homes by 2021.	No
<i>Landowners who agreed made the following comments:</i>			
Support for the general principle of the policy but: <ul style="list-style-type: none"> Should it enable occupation of the new homes before 2021 if needed? Should there be consistency between the policy and the master plan in terms of the lead in times for planning applications and enabling infrastructure. Any footpath and cycle access to the west of the Allocation will need to be by existing rights of way, as public access through land immediately to the west of Pouchen End Lane cannot be delivered. 		No change. Support noted and welcomed. Flexibility already exists under Policy CS3 to bring forward Local Allocations in order to maintain a five year housing land supply. Paragraph 6.28 already adequately addresses the issue of the timing of applications and infrastructure for the local allocations. The approach is consistent between the Policy and the master plan. The restricted public access through land immediately to the west of Pouchen End Lane is noted. The LA3 master plan can be updated accordingly to clarify the need for access to new footpath and cycle routes to be via the existing rights of way.	No
<i>Other comments from Landowners:</i>			
-		N/A	No

ISSUE: Chapter 6 Housing – (f) Local Allocation LA4			
Number of people/organisations responding 7 Supporting - Key organisations 2 Individuals 0 Landowners 0 Total 2 Objecting - Key organisations 3 Individuals 2 Landowners 0 Total 5			
NOTE. The majority of local residents wishing to raise concerns regarding the LA4 development did so by responding to the consultation on the draft site master plan, which ran in parallel to that for the Site Allocations DPD. Please refer to separate Report of Consultation for a summary of issues raised and the Council's response.			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
The impact of the proposal on the historic setting of the British Film Institute site.		No change. Both Policy LA4 and the master plan provide sufficient safeguards. They both refer to the importance of the boundary with the BFI (and associated buildings) and the need to protect it's historical and open setting. This is to be secured through retaining and supplementing boundary planting and through care in the design and layout of new	No

		buildings. It is the intention to achieve this along the full length of the eastern boundary which already provides for significant screening.	
The continued justification for phasing given under-provision of housing land, the lack of planning logic for this, and that it runs counter to the NPPF that seeks to boost housing supply.		<p>No change. The Core Strategy envisaged all six Local Allocations being delivered from 2021 onwards and phasing continues to be justified. There have been no significant changes in circumstances since the adoption of the Core Strategy and in consulting on the Site Allocations DPD, to justify bringing forward this allocation sooner. Policy CS3 provides sufficient flexibility for this to happen, if required. However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice, this will mean that an application for this site 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. This approach is considered to remain appropriate and will ensure that the Council can continue to demonstrate a 5 year housing land supply as required by the NPPF. This approach is consistent with the wording of paragraph 6.28 of the Core Strategy.</p> <p>In terms of Berkhamsted itself, there are significant housing opportunities within the town in the short to medium term without the need for LA4. The small size of LA4 also means it would have a very limited role in significantly boosting housing supply.</p>	No
The need for enhanced monitoring to ensure up to date information on the full range of housing needs, particularly the needs for specialised housing.		<p>No change. The Council carries out regular monitoring of the housing supply through its Annual Monitoring Report. This provides for a reasonable frequency and level of understanding of housing supply and need, given resources and capacity. The Council also works closely with the Strategic Housing team in terms of housing need and demand. The update of the Strategic Housing Market Assessment should provide a more up to date understanding of housing mix and need. These studies will inform the new single Local Plan for the Borough. The LA4 proposal is potentially available to meet some of the need for specialised housing as part of the mix of housing that could be delivered. This is recognised within the master plan (para. 4.11).</p>	No
The degree to which any mitigation measures compensate for the loss of a locally significant area of grassland		<p>No change. The Council accepts that the proposal will lead to the loss of the grassland and that it would be difficult to compensate for this directly. However, the principle of the development is already firmly established through the Core Strategy and the Council is committed to its delivery. The proposal will be designed, as far as is reasonable, to promote biodiversity across the site through the retention of trees and the pond feature, reinforcing existing landscaping, and the creation of open spaces. Biodiversity offsetting is to be investigated through discussions with the County Ecologist which could help mitigate for some of the loss. This issue is explicitly referred to within the draft master plan.</p>	No
<i>Organisations who agreed made the following comments:</i>			
The need for a Drainage Strategy and potentially new and upgraded drainage infrastructure.	S	<p>Change required. With regards to the level of development sought, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific amendments to the text of the Site Allocations document with regard to the Local Allocations.</p> <p>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers of some larger schemes at the planning application stage. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. Therefore, it is considered appropriate to add a short reference to the planning requirements to refer to the need for liaison with Thames Water and the potential requirement for specific technical work to be carried out to assess capacity issues. This will allow flexibility at the pre-application stage should any more specific upgrade requirements be identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues.</p> <p>Amend planning requirements for LA4 to require early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</p> <p>The issue of sustainable drainage and the need to incorporate appropriate mechanisms within the design and layout of the Local Allocations is already highlighted within the Delivery and Phasing section of each relevant policy. However, since publishing the Pre-Submission version of the Site Allocations document the Government has confirmed a change in approach to how development schemes will be assessed. Rather than a dual system when the local planning authority consider the planning application and the SuDS Approval Body (SAB), SuDS issues will now be dealt with through conditions on planning applications, following liaison between the LPA and SAB. The Council has prepared a short guidance note to explain how the new system will be operated. A minor change is required to the</p>	MC28 MC29 MC30

		<p>text of the 'Delivery and Phasing' section of the policy to ensure references are made to the correct advisory bodies. Similar amendments will also be required to the master plan.</p> <p>In addition, the Council is keen to ensure delivery of a comprehensive form of development and associated works (such as foul water drainage and SUDS measures) and other contributions. This can be more difficult to achieve where a scheme is in multiple ownership, such as at LA4. The Council's expectation is that the development will initially be progressed as an application covering the site as a whole, and followed by, if required, a series of separate applications to cover each land ownership. The Council considers a further related update to the policy is required to cover this matter alongside changes to the master plan. Local Allocations LA1, LA3 and LA5 are also in multiple ownerships. Policies LA1, LA3 and LA5 and their master plans should be similarly amended to ensure a consistent approach across schemes towards achieving comprehensive development.</p>	
Support for 40 dwellings being a realistic and appropriate capacity for LA4.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
<p>The justification for LA4 given:</p> <ul style="list-style-type: none"> • The lack of special circumstances; • Recent Ministerial Statements on the Green Belt; • Protection of the Green Belt; • Increasing levels of windfall and other housing opportunities; and • The potential outcome on the extent of housing need and supply following the update of the SHMA and SHLAA and review of the Core Strategy. 		<p>No change. The strategic context for the local allocations is provided by the Core Strategy and the Site Allocations DPD must have regards to this. The level of housing and need for the local allocations was tested through examination of the Core Strategy by an independent Planning Inspector. In finding the Core Strategy sound, the Inspector accepted the Council's approach to housing and the local allocations. Therefore, the principle of releasing land from the Green Belt through the local allocations has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p> <p>See also response to Chapter 6 – Housing for more detailed response to the issues of windfalls and the role of the Green Belt sites in meeting housing need.</p>	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

ISSUE: Chapter 6 Housing – (g) Local Allocation LA5

Number of people/organisations responding 26

Supporting -

Key organisations	3
Individuals	
Landowners	1
Total	4

Objecting -				
Key organisations	5	<i>N.B Natural England and CALA Homes have supported some policies/paragraphs and objected to others, so they are included in the tally once for each support and object</i>		
Individuals	15			
Landowners	4			
Total	24			
NOTE. The majority of local residents wishing to raise concerns regarding the LA5 development did so by responding to the consultation on the draft site master plan, which ran in parallel to that for the Site Allocations DPD. Please refer to separate Report of Consultation for a summary of issues raised and the Council’s response.				
Issue / Summary of Comment		New / Significant?	Response	Amendment required?
Organisations				
<i>Organisations who disagreed made the following comments:</i>				
Object to principle of development.			<p>No change. The Council has taken time and care to identify what are considered, on balance, to be the most appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF). This requires, amongst other things, for Councils to <i>‘positively seek opportunities to meet the development needs of the area’</i> (para 14); and <i>‘boost significantly the supply of new housing’</i> (para 47).</p> <p>The decisions made regarding both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector’s Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector’s main concern when weighing up whether or not to find the Core Strategy ‘sound’ or not, was if the Council had allocated <i>sufficient</i> land for housing, not if any of the Green Belt sites should be removed from the plan.</p> <p>The principle of releasing land from the Green Belt and bringing forward this site for housing and associated uses has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered.</p>	No
The impact on the Chilterns Area of Outstanding Natural Beauty (AONB) is contrary to national policy, the Chilterns AONB Management Plan and the Council’s development plan.			<p>No change. The LA5 development will not significantly harm the special qualities of the AONB, so will comply with Core Strategy Policy CS24. This conclusion reflects the Key Development Principles for LA5 in Policy LA5 (especially principles 3, 5-7, 10, 11, 13 and 14) and the more detailed guidance in the LA5 Draft Master Plan.</p> <p>See below for further consideration of the impact of the different elements of the LA5 proposals on the AONB.</p>	No
The cemetery extension, children’s play area and Travellers’ site should be located within the main development area, not the AONB.		S	<p>No change. The LA5 proposals will not significantly harm the special qualities of the AONB, as explained below:</p> <ul style="list-style-type: none">Public open space: the proposed public open space has the potential to considerably enhance the AONB. The section on ‘Landscape Principles’ on pages 36-39 of the LA5 Draft Master Plan, shows that the proposals for the open space will include the retention of existing trees, the retention and enhancement of existing hedgerows, additional tree planting of native species and the creation of new wildlife habitats. Objections to the possibility of playing pitches being included in the western fields public open space are considered below under ‘Key Development Principle 13’.	No

		<ul style="list-style-type: none"> Children's play area: a location in the western fields is proposed in order to minimise disturbance to residents in the new housing. The play area would not cause significant harm to the special qualities of the AONB, as the LA5 Draft Master Plan (paragraph 5.40) states that it should be designed creatively to fit in with the AONB and that brightly coloured metal equipment should be avoided. Also, it will be relatively small (about 0.1 hectares, or only 1.5% of the proposed western fields public open space). Cemetery extension: a location in the western fields is proposed in order to meet long term needs in the Tring area (see paragraphs 5.51-5.53 in the LA5 Draft Master Plan). It is considered that the cemetery extension will enhance the AONB. Paragraph 5.55 in the Draft Master Plan stresses that great importance is attached to creating a green cemetery that blends harmoniously into the countryside. This paragraph also explains how this will be achieved. Gypsy and Traveller site: a location in the western fields is proposed for the reasons stated in paragraph 5.12 in the LA5 Draft Master Plan. Paragraph 5.13 in the Draft Master Plan explains why the site will have a very limited impact on the special qualities of the AONB. It is proposed to amend the Draft Master Plan to add further detail about the screening/landscaping of the Gypsy and Traveller site. Furthermore, the site will be fairly small (about 0.4 hectares). 	
Limit the scale of development - to ensure that it conserves the openness of the Green Belt, special character of the AONB and wider landscape of the Vale of Aylesbury.		No change. These issues were considered at the Core Strategy Examination, when the principle of allocating this site rather than suggested alternatives was discussed. The scale and nature of the proposed development will conserve the openness of the proposed western fields public open space (which will remain in the Green Belt) and also conserve the special character of the AONB and wider landscape of the Vale. However, a change is proposed in the planning requirements for proposal C/1 (cemetery extension, land west of Tring) in the Schedule of Social and Community Proposals and Sites. This change (minor change MC63) refers to the need for the Chilterns Conservation Board to be consulted.	No
The Chilterns Conservation Board should be consulted on detailed designs to ensure that the special qualities of the AONB are conserved and enhanced.			
Policy LA5 states incorrectly that LA5 has already been released from the Green Belt.		No change. The Green Belt boundary will not be changed until the Site Allocations document is adopted. However, the Pre-Submission version of the Site Allocations shows the text that the Council is proposing in the adopted plan.	No
Employment area extension – the proposed extension is not justified		No change. The justification for extending the employment area is contained in the SW Hertfordshire Employment Land Update (Roger Tym & Partners, June 2010). Paragraph 4.51 in this report advised the Council that: <i>"Icknield Way should be protected and may be expanded to cater for businesses relocating from the other sites in the town and inward investors. We have not reviewed the quantum of space required but there is a natural extension of approximately 2.6 hectares by extending the rear boundary in a straight line up to the boundary with the AONB and to the Icknield Way frontage."</i> The principle of extending the employment area has already been established through the Core Strategy. The proposals for LA5 on page 166 of the Core Strategy include "Extension to the employment area in Icknield Way Industrial Estate". Also, paragraph 22.8 refers to replacement employment provision (for land lost elsewhere) being made through an extension to the Icknield Way general employment area. This proposal is consistent with local objective 4 (Core Strategy page 165) to maintain the current employment provision. Reference should also be made to paragraphs 5.18 and 5.19 in the LA5 Draft Master Plan. Further explanation of the need to extend the cemetery, and the location and scale of the proposed extension is set out in an appendix to the Homes and Community Facilities Background Issues Paper .	No
Employment area extension – the proposed extension should be enlarged to more fully meet the local need for employment land, including firms relocating		No change. Paragraph 4.51 in the SW Hertfordshire Employment Land Update (Roger Tym & Partners, June 2010) advised the Council that: <i>"Icknield Way should be protected and may be expanded to cater for businesses relocating from the other sites in the town and inward investors. We have not reviewed the quantum</i>	No

		<p><i>of space required but there is a natural extension of approximately 2.6 hectares by extending the rear boundary in a straight line up to the boundary with the AONB and to the Icknield Way frontage."</i></p> <p>Whilst there is a need for some land to meet future needs for B-class employment floorspace in Tring, there is also a clear need to provide more housing land. It is considered that the size of the proposed employment area extension (0.75 hectares) represents an appropriate balance between housing and employment development on LA5.</p>	
Cemetery extension – there are no exceptional circumstances that justify extending the cemetery into the Green Belt.	S	<p>Change required – retain the proposed cemetery extension site, but remove the site from the Green Belt. Amend Map GB/9 in the Map Book and the text at the start of Policy LA5 accordingly.</p> <p>The reasons why the Council is proposing to locate the cemetery extension in the western fields rather than immediately next to the existing cemetery are explained in paragraphs 5.51-5.53 of the LA5 Draft Master Plan, However, the Court of Appeal's 11 March 2014 judgment on the Timmins case (Timmins and Lymn Family Funeral Service v. Gedling Borough Council and Westerleigh Group) should be taken into account.</p> <p>The Court of Appeal ruled that cemeteries are inappropriate development within the meaning of the National Planning Policy Framework (NPPF). This is because paragraphs 89 and 90 are closed lists which identify the only categories of development which are 'not inappropriate'. These paragraphs do not list cemeteries, although new buildings providing appropriate facilities for cemeteries are classified as appropriate development.</p> <p>In the light of the Timmins case, it is necessary to demonstrate very special circumstances to justify granting planning permission for a cemetery in the Green Belt (NPPF paragraph 87) or exceptional circumstances to justify excluding sites from the Green Belt in local plans (NPPF paragraph 83).</p> <p>It is proposed to exclude the cemetery extension site from the Green Belt in the Site Allocations document. Exceptional circumstances are considered to exist to justify this approach given:</p> <ul style="list-style-type: none"> • the need for a cemetery extension to serve the Tring area; • there are no suitable non-Green Belt sites available; • the proposed site is the most appropriate location for a cemetery extension large enough to meet the area's long term needs; and • all the proposed uses at LA5 that are inappropriate in the Green Belt (i.e. housing, employment development, cemetery extension and Gypsy and Traveller site) will be on land excluded from the Green Belt, whilst the proposed public open space in the Western Fields remains in the Green Belt. <p>Some justification for the above conclusions can be found in paragraphs 5.51-5.53 in the LA5 Draft Master Plan. A more detailed justification for the cemetery extension is set out in an appendix to the revised 'Providing Homes and Community Services' Background Issues Paper.</p>	SC1 SC7
<p>Gypsy and Traveller site on LA5 – should be deleted because:</p> <p>1. It is not proposed in the Core Strategy.</p> <p>2. The proposed location in the Green Belt is contrary to Government policy, premature given the current Government consultation and conflicts with Core Strategy Policy CS5.</p>	S	<p>Point 1: No change. A brief summary of the process the Council has been through with regard 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.</p> <p>Point 2: Change required – retain the proposed Gypsy and Traveller site, but remove it from the Green Belt. Amend Map GB/9 in the Map Book and the text at the start of Policy LA5 accordingly. Also, amend the Indicative Spatial Layout in Policy LA5 to show the proposed extent of the Gypsy and Traveller site. These changes take account of the Court of Appeal judgment on the Timmins case (see above). Exceptional circumstances are considered to exist to justify removing the site from the Green Belt for the following reasons:</p>	No SC1 SC7 SC8

<p>3. The proposed location in the Chilterns AONB is contrary to Government guidance and conflicts with Core Strategy Policy CS24.</p> <p>4. It would not be well integrated with the settled community.</p>		<ul style="list-style-type: none"> • The need for additional provision for Gypsies and Travellers in the Tring area. • The proposed site is a suitable location for a Gypsy and Traveller site, as explained in paragraph 5.12 of the LA5 Draft Master Plan. • A Gypsy and Traveller site in this location is deliverable as part of the LA5 proposals. • No alternative sites have been identified that are more suitable and available. (See background Issues Paper on 'Homes and Community Facilities' for further explanation). • To comply with Government guidance in paragraph 15 of 'Planning policy for traveller sites', which allows local planning authorities to alter Green Belt boundaries to meet a specific identified need for a traveller site if exceptional circumstances exist. It should be noted that the Government's consultation on 'Planning and travellers' (September 2014) does not propose any changes to paragraph 15 of the existing guidance. • To ensure that all the uses proposed at LA5 that are inappropriate in the Green Belt (i.e. housing, employment development, cemetery extension and Gypsy and Traveller site) are excluded from the Green Belt, whilst the proposed public open space in the Western Fields remains in the Green Belt. <p>Point 3: No change. The Gypsy and Traveller site would have a limited impact on the AONB, but this would be mitigated by the proposed screening. Also, the overall proposals for LA5 will not harm the special qualities of the AONB (see response to objections regarding the impact on the AONB above).</p> <p>Point 4: No change. It is not accepted that the site would be poorly integrated with the settled community – indeed, Hertfordshire County Council's Gypsy Unit Manager and a resident living on the Long Marston Gypsy site support the proposed location.</p>	<p>No</p> <p>No</p>
If there are exceptional circumstances warranting a Traveller site in this location, the land should be excluded from the Green Belt.	S	Change required – exclude the proposed traveller site from the Green Belt. See the response above.	SC1 SC7
Principle 5 (limit the effect of new buildings on views from the Chilterns AONB) – support this principle, but add the following: “and enhance the background view of Tring from the AONB”.		No change. It is considered that Key Development Principle 5 already provides sufficient guidance in the Site Allocations document. Further more detailed guidance is provided by paragraph 5.41 in the LA5 Draft Master Plan.	No
Principle 10 (cemetery extension) - a 'green burial ground' should be proposed to soften the impact on the Green Belt and AONB.		Change required - amend Key Development Principle 10 to state that the cemetery extension should include a significant area for natural burials. This amendment reflects paragraph 5.55 in the LA5 Draft Master Plan	MC32
Principle 13 (open space in the western fields) - playing pitches would harm the natural beauty of the Chilterns AONB.		<p>Change required. Key Development Principle 13 does not propose playing pitches, but simply says they should be considered. Paragraph 5.35 in the LA5 Draft Master Plan states that the Council's preference is for the western fields to provide a mix of parkland and open space, but refers to the possibility of playing pitches.</p> <p>There is a need for some flexibility over the location of new pitches in Tring, as set out in Dacorum's Playing Pitch Strategy and associated Action Plan. Therefore, the possibility of providing playing pitches in the western fields should be retained. However, a large complex of playing pitches would harm the special qualities of the Chilterns AONB, as substantial changing rooms and car parking and possibly floodlighting would be required. These limitations are recognised within the Action Plan. Therefore, Key Development Principle 13 should be amended to make it clear that playing fields are acceptable only on part of the western fields open space. Also, additional guidance should be included in the 'green space principles' section of the LA5 Master Plan.</p>	MC31 MC33
Principle 13 (open space in the western fields) - no objection to sports/recreational uses in the western fields, but would prefer this land to remain as fields.		Change required – as a result of above response.	MC33

Key Development Principles - add another development principle, stating that there should be no external lighting, solid boundary treatments or buildings in the western fields.		<p>No change. External lighting: paragraph 5.36 in the LA5 Draft Master Plan already states that artificial lighting in the western fields should be avoided.</p> <p>Solid boundary treatments: Key Development Principle 14 in Policy LA5 already refers to retaining and enhancing hedgerows and tree belts and providing new native tree planting. This principle is supplemented by pages 36-38 in the LA5 Draft Master Plan.</p> <p>Buildings: The only buildings proposed in the western fields are on the proposed Traveller site – see the response to objections from organisations concerning the Traveller site. If there were to be the need in the future for any form of pavilion or changing rooms to serve any playing pitches, this would need to be small scale and discreetly located. This can be referred in tin the more detailed text of the master plan.</p>	No
Principles 10, 13 and 15 (cemetery extension, outdoor sports and outdoor recreation) do not comply with NPPF paragraph 89 regarding appropriate development in the Green Belt.		<p>No change. The Court of Appeal's judgment of 11 March 2014 on the Timmins case (Timmins and Lymn Family Funeral Service v. Gedling Borough Council and Westerleigh Group) should be taken into account.</p> <p>The Court of Appeal ruled that cemeteries are inappropriate development within the meaning of the NPPF, because paragraphs 89 and 90 are closed lists which identify the only categories of development which are 'not inappropriate'. These paragraphs do not list outdoor sport, outdoor recreation or cemeteries. Nevertheless, new buildings providing appropriate facilities for outdoor sport, outdoor recreation and cemeteries are classified as appropriate development.</p> <p>Despite NPPF paragraphs 89 and 90, it is uncertain whether outdoor sport and outdoor recreation are appropriate development, because NPPF paragraph 81 requires local planning authorities to plan positively to enhance the beneficial use of the Green Belt, including by providing opportunities for outdoor sport and recreation. The Court of Appeal was split on this issue, but did not consider it necessary to reach a decision as the case before the Court concerned cemeteries, rather than outdoor sport and recreation.</p> <p>In view of the above, the following conclusions are reached on Principles 10,13 and 15:</p> <p>Principle 10 (cemetery extension): retain because it is now proposed to remove the proposed cemetery extension site from the Green Belt (see page 3 above).</p> <p>Principles 13 and 15 (outdoor sport and outdoor recreation): retain. There is uncertainty over whether outdoor sport and outdoor recreation are appropriate Green Belt uses. However, even if the courts decide in the future that such uses are inappropriate, the Council considers that very special circumstances justify such uses in the western fields. These uses are consistent with NPPF paragraph 81, are open in nature, would enhance the Green Belt and meet the need for additional open space in west Tring. Also, there are no suitable non-Green Belt sites available.</p>	No
The indicative spatial layout should be amended to show the Green Belt and AONB boundaries.		<p>No change. The indicative spatial layout illustrates the main elements of the proposed development, not the planning policy context. Map GB/9 in the Site Allocations Map Book shows the proposed Green Belt boundary and a further change is now proposed through significant change SC1. The new Green Belt boundary and the AONB boundary will be shown on the revised Policies Map, which will be produced when the Site Allocations document is adopted..</p>	No
Bullet point 1. (Timing of release) - there is no evidence or justification for accepting development before 2021 and for treating LA5 differently from the other local allocations.	S	<p>No change. The Core Strategy envisaged all six Local Allocations being delivered from 2021 onwards. 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. 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 earlier release of LA5 are set out in the Meeting Homes and Community Needs Background Issues Paper (June 2014). They include:</p> <p>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);</p> <p>the benefits of the early delivery of the extension to the Icknield Way GEA;</p> <p>the benefits of securing land for an extension to Tring cemetery and associated public open space; and</p>	No

		<p>the lack of any infrastructure capacity issues that require site delivery to be delayed until later in the plan period.</p> <p>The remaining Local Allocations (i.e. LA1-LA4 and LA6) are included in Part 2 of the Schedule of Housing Proposals and Sites and will bring forward completed homes from 2021 onwards. There have been no significant changes in circumstances since the adoption of the Core Strategy and in consulting on the Site Allocations DPD, to justify bringing forward these allocations sooner. Policy CS3 provides sufficient flexibility for this to happen, if required. No detailed phasing of individual sites 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. This approach is considered to remain appropriate and will ensure that the Council can continue to demonstrate a 5 year housing land supply as required by the NPPF. This approach is consistent with the wording of paragraph 6.28 of the Core Strategy.</p>	
<i>Organisations who agreed made the following comments:</i>			
Support the proposed new open space, which may include playing pitches, to meet the need identified in the Outdoor Leisure Facilities Study (2014). A decision on whether playing fields should be provided should be taken once the action Plan relating to the 2014 study has been completed.		No change. Support noted and welcomed. See response to objections to the proposed open space above (on pages 2 and 5 above).	No
Support the proposed more detailed Landscape and Visual Impact Assessment at the planning application stage, covering issues such as night time lighting. The impact on the Ridgeway National Trail should also be considered.		No change. Support noted and welcomed.	No
Support for further protected species studies to be undertaken, and support for the proposals to incorporate biodiversity enhancements.		No change. Support noted and welcomed.	No
Bullet point 6 (sewage and sewage treatment capacity): Thames Water comment re 'no objection but concerns about capacity' - new and upgraded drainage infrastructure is likely to be needed ahead of the development. A Drainage Strategy will be needed to identify what is required – this may delay the development, but the developer could requisition the infrastructure to deliver it sooner. A Grampian condition may be needed to ensure the infrastructure is in place ahead of occupation of the development.	S	<p>Change required. Minor change required to add reference to specific housing proposals regarding the need for early liaison required with Thames Water to develop necessary Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of the site. Also, amend bullet 7 (sustainable drainage) to reflect the changes made by the Government to the regime for obtaining approval for sustainable urban drainage systems (SuDS).</p> <p>A series of meetings have been held to discuss issues regarding waste water and sewerage issues with Thames Water (together with the Environment Agency) in early 2015. With regard to the Local Allocations, it is noted that Thames Water did not raise any objections through the Core Strategy and have not highlighted any significant issues when consulted on the Council's Infrastructure Delivery Plan (InDP). They have also not requested any specific amendments to the text of the Site Allocations document with regard to the Local Allocations.</p> <p>However, the Council is aware that Thames Water is often requiring technical work to be carried out by developers at the planning application stage for larger sites or those located in areas of existing sewerage / waste water constraint. This is to ensure they are satisfied that the local waste / foul water network has the capacity to deal with the additional demands. In the light of this experience, the landowners / developers of the Local Allocations have been advised to liaise with Thames Water at an early stage when drawing up their detailed schemes.</p> <p>The proposed revised text for bullets 6 and 7 will also be supported by more detailed text in the LA2 Master Plan. If any more specific upgrade requirements are identified through future updates to the InDP, or the associated county-wide work that is underway to consider waste water issues, these will be reflected in the text of the finalised master plan and/or passed through to developers at the pre-application stage.</p> <p>A short Advice Note entitled 'Planning Requirements for Waste Water Infrastructure Issues in Dacorum' has also been</p>	MC35, MC36

		<p>prepared and placed on the Council's website. This advises developers of the requirement for the above sites, sets out what a Drainage Strategy should cover and provides contact details should further advice be required from Thames Water.</p> <p>Where necessary the Council will impose Grampian Conditions to ensure sewerage and waste water issues are appropriately addressed.</p>	
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Object to principle of development.		No change. See response to objections to the principle of development on page 1 above.	No
Loss of Green Belt (to Local Allocation)		<p>No change. The principle of removing land from the Green Belt (via the Local Allocations sites) was tested and established through the Core Strategy. The role of the Site Allocations is to take forward this approach and to make the actual changes to the Green Belt boundaries that will enable this development to go ahead.</p> <p>When drawing up the Core Strategy the Council had to ensure that it reflected guidance on the Green Belt and other matters set out in the National Planning Policy Framework (NPPF). This was tested as part of the Examination process and the plan found 'sound.'</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy and continues to do through its Site Allocations document.</p> <p>The Local Allocations identified within the Core Strategy remain the only proposed housing sites identified for release from the Green Belt.</p>	No
Conflict with NPPF / Government policy and recent ministerial statements on Green Belt protection	S	<p>No change. The Council acknowledges that Government guidance (as contained in the NPPF) attaches great weight to the protection of the Green Belt against inappropriate development. This approach has not changed through the recent Ministerial Statement (4 October 2014) or the recent wording changes to the Planning Practice Guidance (PPG) that accompanied this statement. The Green Belt has always been a constraint that we have taken into account when deciding how far we can meet the area's objectively assessed need.</p> <p>It is important to note that the NPPF specifically allows for new Green Belt boundaries to be established when Councils review their strategic plan (i.e. the Core Strategy) (para. 83) through the plan-making process. It recognises that it is sensible for Councils to assess the long term changes planned in their area over the lifetime of their plans and how this might affect the permanency of the Green Belt. This is exactly what the Council has done through the Core Strategy. A key role of the Site Allocations DPD is to take forward the strategic policies and targets relating to housing within the Core Strategy and ensure that these are delivered on the ground. It is the role of the early partial review (in the form of a new single Local Plan) to look again at longer term needs and take account of a whole range of Government policies and guidance, including those relating to the Green Belt.</p> <p>Equally, the NPPF places considerable emphasis on Councils meeting their development needs (para. 14), and in particular to "significantly boost the housing supply" (para. 47). In considering these points, Councils are expected to meet their "objectively assessed needs" for housing as far as possible (para. 47) having regards to a range of factors set out in the NPPF, including the Green Belt.</p> <p>The Council considers that the changes to the PPG are particularly aimed at the growing number of speculative housing development proposals submitted by developers through the decision-making (planning application) rather than the plan-making process. The changes do not affect how we implement plans that are already adopted, such as our Core Strategy and associated proposals that it contains.</p> <p>Therefore, the Council considers that nothing has fundamentally changed in terms of Green Belt policy from when the Core Strategy was considered and adopted and what the situation is now to warrant changes to how the Council</p>	No

		progresses the Site Allocations DPD.	
Policy LA5 should be deleted as the policy states incorrectly that LA5 has already been released from the Green Belt.		No change. See the response above to objections from organisations on this point.	No
Sites north east of Tring would be a better location than LA5 for housing and employment development.		<p>No change. The potential role that other sites could play in meeting Dacorum's housing needs was considered as part of the Core Strategy Examination. This included brownfield sites and other greenfield and Green Belt sites. The Inspector supported the choice of Local Allocations proposed by the Council. It is therefore appropriate that it is these sites that are progressed through the Site Allocations process. There have been no significant changes in circumstances since adoption of the Core Strategy and in consulting on the Site Allocations DPD to justify allocating additional or alternative sites. This can more appropriately be considered in preparing the new single Local Plan and considered then against the identified objectively assessed need (OAN) See response to new Green Belt housing sites.</p> <p>In terms of the Green Belt and Local Allocations, the Core Strategy also clearly states <i>that "The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change will be necessary in the Site Allocations DPD, other than to define these locations precisely and correct any minor anomalies that may still exist."</i></p>	No
Development at LA5 would set a precedent for other greenfield developments.		No change. LA5 will not set a precedent. Further Green Belt boundary changes will be made in the future only if exceptional circumstances can be demonstrated which justify such changes.	No
The 'Green Belt Review: Purposes Assessment' should not be treated as a robust evidence base for decisions on the extent of loss of Green Belt at LA5.		No change. The principle of development on LA5 and the need to amend the Green Belt boundary has already been decided in the Core Strategy. The Green Belt Review Purposes Assessment (November 2013) post-dates the adoption of the Core Strategy (September 2013) and played no part in the decision to change the Green Belt boundary at LA5. The purpose of the November 2013 document is to form part of the evidence base for the forthcoming Single Local Plan (incorporating the Core Strategy early partial review).	No
LA5 is not justified, given the number of homes now proposed in employment premises. Also, there is potential brownfield/infill land in Tring that might achieve the required number of new homes.		<p>No change. Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of 'brownfield' sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council's annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council's website and formed part of the evidence presented to the Core Strategy Examination (see above). The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough's future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at the full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the</p>	No

		<p>permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector's Report concluded that the Council was not planning to meet the Borough's full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council's overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>The Tring Place Strategy in the Core Strategy includes a local objective to '<i>provide around 480 homes between 2006 and 2031</i>'. There is considerable uncertainty over exactly how many homes will actually be built in Tring over what is a lengthy plan period. However, it now seems likely that house building in Tring (including LA5) will be somewhat higher than 480, but less than 480 if no housing is built at LA5. However, it should be stressed that the figure of 480 homes is neither a target nor a ceiling. It is simply a forecast of the approximate likely number of homes that will be built in Tring as a result of the policies in the Core Strategy. The only housing target in the Core Strategy is the borough-wide target in Policy CS17.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p>	
Proposed housing allocation H18 (Miswell Lane, Tring) should be publicly discussed as part of the LA5 proposals.		<p>No change. Proposed housing allocation H18 has been subject to public consultation at the same time as LA5, as both proposals are included in the Site Allocations document. However, H18 is a fairly small site (area: 0.8 hectares; estimated capacity = 18 homes) and is located 300 metres from LA5. It is therefore not considered necessary for the LA5 Master Plan to also cover H18.</p>	No
LA5 proposals are not legally compliant, as there was insufficient detail in earlier stages of consultation and a lack of community involvement.		<p>No change. This was a matter for consideration by the Core Strategy Planning Inspector. The Core Strategy Inspector's Report was issued in July 2013 and stated that, subject to some modifications, the Core Strategy was 'sound'. An Inspector can only reach this conclusion if they are satisfied that the Council has fulfilled certain tests. The Core Strategy must be prepared in accordance with the "duty to co-operate", legal and procedural requirements, and whether it is sound. Soundness is determined with reference to the tests set out in paragraph 182 of the National Planning Policy Framework – i.e. the Core Strategy must be positively prepared, justified, effective and consistent with national policy. The Inspector was satisfied in all respects. In his report referring to public consultation, he concludes: <i>"...the requirements of the Statement of Community Involvement (SCI) have been met and the level and nature of the consultation undertaken was appropriate."</i></p> <p>The Statement of Community Involvement (SCI) is the Council's statement of policy on public consultation for planning documents (and planning applications). It was subject to independent scrutiny by a Planning Inspector before it was adopted in June 2006. The Council has gone beyond the requirements of this SCI, and of consultation requirements set out within Government planning regulations in preparing the Core Strategy and hence establishing the principle of this site. It has also complied with the SCI in preparation of the Site Allocations document and associated master plans.</p> <p>A full summary of the consultation undertaken by the Council on both the Core Strategy and the current Site Allocations document are contained in the relevant Reports of Consultation and Report of Representations. All of</p>	No

		<p>these documents are published on the Council's website and their content has been reported to Members at the appropriate time.</p> <p>It should be noted that the Council intends to review and update its SCI prior to beginning consultation on its new single Local Plan.</p>	
Unacceptable impact on the Chilterns AONB – contrary to NPPF, Core Strategy Policy CS24 and Chilterns Management Plan. There should be no development in the AONB.		No change. See response above to objections from organisations concerning the impact on the AONB.	No
LA5 would have an unacceptable impact on the Beechwoods area of Tring, which is a Special Area of Conservation.		<p>No change. A Habitats Regulations Assessment (HRA) under the UK's Habitat Regulations of Dacorum's Core Strategy Issues and Options document was undertaken by Halcrow in 2008. An updated version was produced in 2011, based on the Pre-Submission version of the Core Strategy.</p> <p>The HRA considered the potential impacts on European sites of nature conservation interest (also known as Natura 2000 sites). The HRA was produced in close consultation with Natural England, the statutory consultee for HRAs in England. Consultation with Natural England in 2007 confirmed that only one Natura 2000 site was relevant to the screening process for the Core Strategy: Chiltern Beechwoods Special Area of Conservation (SAC).</p> <p>The broad extent of the Chiltern Beechwoods SAC within Dacorum is shown on the Core Strategy Key Diagram (Core Strategy page 7). The main area is around Ashridge, but there is also a smaller area covering Tring Park.</p> <p>It was concluded in the HRA that the level and distribution of development proposed in the Core Strategy will not have any cumulative significant impacts on the SAC.</p> <p>The level of housing now proposed at Tring in the Site Allocations document is not significantly higher than indicated in the Core Strategy. The Council's independent Sustainability Consultants (C4S) have advised that the HRA does not need to be updated for the Site Allocations DPD as the broad quantum and location of development remains unchanged from the Core Strategy (see accompanying SA Report). Furthermore, Natural England has not made any objections to the Site Allocations document. Therefore, the impact on the SAC is not a matter which should be considered at the Site Allocations public examination.</p>	No
The increase in housing numbers at LA5 since the Core Strategy and the relatively low housing density proposed mean that a significantly larger amount of Green Belt will need to be released than was suggested in the Core Strategy.		<p>No change. The area of land considered suitable for development when the Core Strategy was prepared is stated in paragraph 2.5 of the LA5 Statement of Common Ground (August 2012). This document was agreed between the Council and CALA Homes for the Core Strategy public examination. The area of land involved (9.8 hectares) is now called the eastern fields development area in the amended LA5 Indicative Spatial Layout (see significant change SC8) and is precisely the same as envisaged in 2012. It follows a north-south hedgerow and equates to the non-AONB part of LA5.</p> <p>The Core Strategy proposed 150 homes at LA5. This was a cautious figure which reflected uncertainty over how much of the developable area would be devoted to housing and how much to other uses (employment, cemetery and open space). The more detailed work carried out to produce the Draft Master Plan has resulted in an initial conclusion on the amount of housing land (7.7 hectares), the size and mix of housing on the site and landscaping/open space within the housing area. As a result, it has been possible to increase the estimated housing capacity without enlarging the actual development area.</p>	No
The cemetery extension should adjoin the existing cemetery and not be physically separate from it.		Change required - remove the proposed cemetery extension site from the Green Belt. See the response above to objections from organisations about the location of the cemetery extension.	SC1 SC7
<p>Object to the proposed Gypsy and Traveller site. Reasons include:</p> <ol style="list-style-type: none"> 1. Unacceptable impact on the Green Belt and Chilterns AONB. 2. Contrary to ministerial statements (July 2013 and January 2014) that state that traveller sites are inappropriate in the Green Belt. 3. The Site Allocations document places too much weight on siting Gypsy and Traveller pitches next to the local allocations. 	S	<p>Points 1 and 2: Change required - retain the proposed Gypsy and Traveller site, but remove it from the Green Belt. See the response above to objections from organisations concerning the proposed Traveller site.</p> <p>3: No change. See the response above to objections from organisations concerning the proposed Traveller site.</p> <p>4: No change. These issues can to a large extent be controlled by landscaping/screening and planning conditions.</p> <p>5: No change. The Council's approach is to try to integrate Gypsy and Traveller provision as far as possible with new bricks and mortar housing, and reflects the criteria set out in Policy CS22: New Accommodation for Gypsies and</p>	<p>SC1 SC7</p> <p>No</p> <p>No</p>

4. Concern over unsightly appearance, commercial activities and local disruption associated with Gypsy and Traveller sites. 5. Too close to housing.		Travellers which requires sites to be located close to services and facilities. The traveller site at LA5 is not immediately adjoining any housing – being about 100 metres from the proposed new housing on LA5 and the closest existing house.	No
<p>The following locations would be better locations than LA5 for the Traveller site:</p> <p>The former household waste site in Tringford Road, Tring. Bovingdon Airfield (identified in the Gypsy and Traveller Study 2007 as one of the most suitable locations). Berkhamsted.</p>	S	<p>No change. 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, 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)</p> <p>Feedback on these potential sites was sought as part of Site Allocations consultation in 2008. 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: http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-g-t-2008.pdf?sfvrsn=0</p> <p>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.</p> <p>The potential to extend the two existing Gypsy sites within the Borough has been considered and discussed with the Gypsy and Traveller Units 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. The Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the 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. The owners of the land adjacent to the Long Marston site have also been approached by the Council regarding any potential expansion and have confirmed their opposition to this.</p> <p>Other sites suggested through the Pre-Submission consultation and also submitted as having development potential through the 'call for sites' process' have also been considered and discounted as realistic or appropriate options. A fuller explanation is set out in the Homes and Community Services Background Issues Paper. The text of the September 2014 version of this document has been updated to elaborate on the explanation previously given, as a result of representations received. New sites suggested have also been appraised.</p> <p>See also responses to issue in Chapter 6: Homes.</p>	No
Development Principle 1 (house types) - the affordable housing should be available to Tring residents.		No change. Paragraph 5.6 in the LA5 Draft Master Plan states that the affordable housing should comprise 75% rented and 25% shared ownership or other forms of intermediate housing. The Borough Council has nomination rights to 75% of the rented affordable homes. These properties will be allocated through the Council's 'Housing Allocations Policy' to people with local connections in the Borough. Housing Associations will decide the occupancy of the rest of the affordable housing in accordance with their own allocation policies.	No

Development Principle 3 (building heights) - new housing should be low rise to minimise visual impact.		No change. Key Development Principle 3 in Policy LA5 already states that most buildings should be limited to two storeys. Further relevant guidance can be found in the section of the LA5 Draft Master Plan on 'Design Principles (pages 31 and 32). This guidance is intended to ensure that the visual impact of the LA5 development is acceptable.	No
Concern over visual impact of the proposed development.		No change. Many of the Key Development Principles in Policy LA5 are intended to ensure that the visual impact of LA5 is mitigated. Further detailed guidance on this issue is contained in the LA5 Draft Master Plan. The sections on Design Principles, Green Space Principles and Landscape Principles in chapter 5 of the Draft Master Plan are particularly relevant. A first stage Landscape and Visual Impact Assessment (LVIA) has been prepared for the site. This will be updated and considered as part of the planning application process.	No
Add a further principle - there should be no buildings in the western fields.		No change. See the response on page 4 above to objections from organisations on the traveller site and page 5 on lighting, boundary treatments and buildings.	No
Delivery and Phasing bullet point 1: It is not necessary to allow development of LA5 prior to 2021 to meet the requirement for a 5 year housing land supply.	S	No change. See the response above to objections from organisations regarding the timing of development on LA5. It should also be noted that helping to maintain a 5 year housing land supply is only one of the six reasons given in paragraph 2.69 of the Background Issues Paper on 'Strengthening Economic Prosperity' for allowing development of LA5 before 2021.	No
Concerns re infrastructure capacity (general)		<p>No change. As part of preparing its plan for the scale and location of new development in the Borough, the Council has prepared an Infrastructure Delivery Plan (InDP). The InDP provides information on a range of infrastructure issues including school capacities, highway issues and planned improvements, water and sewerage capacities and GP services. It looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors' surgeries was provided by the Clinical Commissioning Group.</p> <p>The InDP is updated regularly (usually on an annual basis). The current (2015) update has been timed to take account of concerns regarding infrastructure issues raised through the Site Allocations Pre-Submission consultation and provide an opportunity to discuss these further with providers. This revised version of the InDP will accompany the Submission version of the Site Allocations DPD. This update ensures key infrastructure concerns are raised with providers and any necessary amendments made to the DPD and accompanying Local Allocation master plans to ensure these are properly addressed.</p> <p>The 2015 InDP confirms that Council's view that there are no infrastructure issues which prevent LA5 (and other planned development in Tring) coming forward as scheduled.</p>	No
Concern about capacity of schools in Tring – there is inadequate capacity in local schools and no information on how 'latent capacity' will meet future demand for places (the evidence base and Infrastructure Delivery Plan) are out-of-date.	S	<p>Change required to clarify the position regarding potential additional education provision in Tring.</p> <p>At the request of the Council, Officers in the Children's Schools and Families Unit at Hertfordshire County Council have provided updated information regarding schooling issues in Tring.</p> <p>For primary schools this information shows a predicted surplus of 27 places for 2015/16, 52 for 2016/17 and 44 for 2017/18. This is out of a total reception place capacity of 200 spaces across the town. (The County Council do not model primary school capacities beyond a 4 year period).</p> <p>The updated information from the County Council also shows that primary schools in Tring have sufficient latent capacity to provide for housing growth to 2031. This conclusion reflects the scope to expand Dundale Primary School from 1.3 to 2 forms of entry and expand The Grove Primary School from 2 to 3 forms of entry.</p> <p>In terms of secondary school capacity, there is predicted to be a small deficit of places in the period 2017/18-2021/22 of between 1 and 15 places. Before and after this period there is expected to be a small surplus. The County Council are happy that the Core Strategy refers to the potential for the secondary school to expand on its existing site, and the provision of detached playing fields to enable this expansion.</p> <p>For clarity, the following changes are proposed to the Site Allocations DPD:</p>	MC60 SC10 SC12

		<p>Add text to section 7 to explain that the forecast needs for school places in Tring can be met by expanding Tring Secondary School (including the provision of detached playing fields) and expanding Dundale and The Grove Primary Schools.</p> <p>Include the proposed detached playing fields for Tring Secondary School in the Schedule of Leisure Proposals and Sites in section 7 of the Site Allocations Written Statement.</p> <p>Include the location of these detached playing fields on the Policies Map. This was requested by Hertfordshire County Council through their representations (see response to issues relating to section 7 of the Site Allocations).</p> <p>Add text to the Tring Place Strategy (section 13 in the Written Statement) to reflect the above.</p>	
Concern about capacity of doctors' surgeries in Tring	S	<p>No change. Officers from the Borough Council have met representatives of the Herts Valleys Clinical Commissioning Group as part of work to update the Infrastructure Delivery Plan (InDP). They have confirmed that they do not anticipate any capacity problems in the foreseeable future given known developments in Tring, including LA5.</p>	No
Herts Police should reconsider their decision not to ask for CIL/S106 monies from the development.		<p>No change. As part of the process of updating the Infrastructure Delivery Plan (IDP), the Council will give infrastructure providers (including Hertfordshire Police) information on likely future levels of house building in different parts of the Borough. This will assist providers in planning their services accordingly and might result in providers asking for CIL monies in the future or seeking provision of infrastructure through S106 agreements.</p>	No
Concern over road capacity in Tring – there is congestion at the western end of the town (including Icknield Way)		<p>No change. Both the Highway Authority (Hertfordshire County Council) and the Highways Agency (now called Highways England, who are responsible for the motorway and trunk road network) have been consulted throughout preparation of the Core Strategy and Site Allocations DPDs. The Council has also consulted Buckinghamshire County Council, as the County boundary adjoins LA5. No concerns regarding the ability of the overall road network to cope with the scale of new development proposed have been raised by any party, although it is acknowledged by the Borough Council that some local highways improvements and mitigation measures will be required relating to specific site proposals.</p> <p>The above conclusion reflects work carried out by the Highway Authority in 2012 and 2013 in analysing traffic issues in Tring and identifying possible solutions as set out in the Tring, Northchurch and Berkhamsted Urban Transport Plan. This Plan can be read/ downloaded at http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/tnbutp/.</p> <p>The Highway Authority's advice is reflected in the planning requirements for LA5 and in the Schedule of Transport Proposals.</p> <p>A Transport Scoping Report on LA5 has been agreed with Hertfordshire and Buckinghamshire County Councils.</p> <p>Detailed highway issues will be considered in a Transport Assessment as part of the planning application process, for which the Highway Authority are statutory consultees. Appropriate highway improvements and mitigation measures will be secured through developer contributions and agreements.</p>	No
Concern over insufficient car parking in Tring town centre		<p>No change. A lack of parking in the town centre was not identified as a problem when the Highway Authority (Hertfordshire County Council) drew up the Tring, Northchurch and Berkhamsted Urban Transport Plan in 2012/ 13. This Plan can be read/ downloaded at http://www.hertsdirect.org/services/transtreets/tranpan/tcatp/tnbutp/.</p> <p>The Highway Authority have confirmed that this remains their view.</p>	No
The site is not in a sustainable location, so bus access to the site should be improved.		<p>No change. The relative merits of this site's location were discussed as part of the Core Strategy examination. The site is within walking distance of a range of local services and facilities (see Figure 4 in the LA5 Draft Master Plan) and is served by a number of bus routes (see paragraph 3.20 in the Draft Master Plan). Financial contributions to support local bus services may be sought at the planning application stage or Community Infrastructure Levy funds</p>	No

		might be used for this purpose.	
An independent third party should be brought in to assess the robustness of infrastructure planning for Tring.		No change. An independent third party (URS consultants) produced the first Dacorum Strategic Infrastructure Study (February 2011). This document was drawn upon by the Council in preparing the Dacorum Infrastructure Delivery Plan Update (InDP), published in June 2012 and subsequent updates. InDPs are informed mainly by discussions with infrastructure providers. The InDP includes an Infrastructure Delivery Schedule, which sets out as the proposed infrastructure projects. This schedule is updated regularly – usually on an annual basis A 2015 update to the InDP has been published and reflects further discussions with infrastructure providers, with a particular focus on those issues raised as concerns through the Pre-Submission Site Allocations consultation. It is not considered necessary to commission independent consultants to update the InDP – if consultants were used they would base their conclusions on the same information as the Council from infrastructure providers.	No
There is no assurance that most of the CIL money from developments in Tring will be spent on infrastructure in the town.		No change. In the light of the CIL Regulations 2010 as amended, 15% of CIL money from developments in Tring will go to Tring Town Council to support growth in the town, up to 5% will cover Dacorum's administration costs and the rest will go into Dacorum's central CIL fund. The Borough Council will decide annually how to allocate funds from this pot, based on evidence of infrastructure need. Infrastructure providers will submit bids for funding.	No
<i>Individuals who agreed made the following comments:</i>			
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
The LA5 development would close the strategic gap between Aston Clinton and Tring.		No change. The principle of development at LA5 has already been established through the Core Strategy when its location and impact on the Green Belt was considered (see response to objections to the principle of development from organisations above). Development at LA5 would reduce the gap between the eastern edge of Aston Clinton to the western edge of Tring by less than 10%, from about 1,530 metres to just over 1,400 metres. This is not considered to be a significant reduction. The land within Aylesbury Vale is not shown as a strategic gap in the adopted Aylesbury Vale District Local Plan (2004), although it is within the Green Belt and the AONB.	No
Land at Waterside Way should be released from the Green Belt in addition to LA5 to meet the objectively assessed need for housing in Dacorum. Growth in Tring should be higher and Waterside Way is the most appropriate location for development (it has significant advantages over LA5).		No change. A number of representations seek to promote additional housing sites within the Green Belt. The Core Strategy considered the need for changes to be made to the Green Belt to accommodate new development and resulted in the designation of six Local Allocations. The Site Allocations formally removes these sites from the Green Belt through changes to the Policies Map. Paragraph 8.29 of the Core Strategy clearly states that “ <i>The Council's own review of the Green Belt boundary has identified some locations where releases of land will be necessary to meet specific development needs. No further change 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).</i> ” This is reflected in the text of Policy CS5: Green Belt which states that “ <i>There will be no general review of the Green Belt boundary through the Site Allocations DPD, although local allocations (under Policies CS2 and CS3) will be permitted.</i> ” This approach was accepted by the Core Strategy Inspector and is reflected in the Site Allocations DPD. A full review of the Green Belt is being carried out to inform the early partial review of the Core Strategy, through the production of a new single Local Plan. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the content of any future Local Plan. It should also be noted that the Waterside Way site was assessed when the Core Strategy was prepared, but it was concluded that LA5 was the most suitable site on the edge of the town to release from the Green Belt. Waterside Way was considered at the Core Strategy public examination, but the Inspector did not recommend any changes to the plan.	No
The capacity of LA5 has been over-estimated, given the following points: 1. The Gypsy and Traveller site, children's play area and cemetery extension should be located in the part of LA5 lying outside the AONB.		No change. An estimate of site capacities for the Local Allocations was established through the Core Strategy. These estimates were based on prevailing densities and the area of the site, and tempered by local infrastructure considerations. It is appropriate to make effective use of land if it is to be released from the Green Belt in order to	No

<p>This would reduce the area available for housing development.</p> <p>2. The Icknield Way employment area extension is the most suitable site in Tring to meet future business needs in the town, but the size of the proposed extension is wholly inadequate to meet future needs.</p> <p>3. Additional landscaping should be provided in the development area. This should include a degree of separation between the existing cemetery (which is a registered heritage asset) and the new housing, to protect the setting of the heritage asset and the quietude enjoyed by visitors to it.</p>		<p>minimise the scale of releases required. Following more detailed technical work carried out as part of preparing draft masterplans, some site capacities have been adjusted to reflect the availability of further information about the amount of land available for development and/or the expected configuration of uses within a site.</p> <p>Overall this does marginally increase the level of housing supply proposed across the Local Allocations as opposed to the levels indicated in the Core Strategy. It is important to note that this work has indicated that the capacity of one site (LA4) should be reduced. None of the issues raised through the Pre-Submission Site Allocations or draft masterplan consultation indicate that the current capacity figures should be amended. The final capacity of all Local Allocations will be tested via the planning application process. This application process will include further public and stakeholder consultation.</p> <p>As stated in paragraph 5.5 of the LA5 Draft Master Plan, the estimated housing capacity still implies a relatively low housing density of well under 30 dwellings per hectare, which means that the new housing can be appropriately landscaped.</p> <p>With regard to the specific points raised by the objectors:</p> <p>Point 1: See the response above to objections from organisations regarding the impact on the AONB.</p> <p>Point 2: See the response above to objections from organisations contending that the employment area extension should be enlarged.</p> <p>Point 3: Key development principles 6, 7 and 14 in Policy LA5 already refers to the need:</p> <ul style="list-style-type: none"> • <i>“for landscaped open space within the development area;</i> • <i>to protect the green and open setting of Tring Cemetery, which is a locally listed historic park or garden; and</i> • <i>to retain and enhance existing tree belts”</i> <p>Further, more detailed, guidance is provided in the LA5 Draft Master Plan. For example, paragraph 5.46 requires a landscaped buffer between the southern housing area and the cemetery. Also, Figure 9 (Concept Master Plan) in the Draft Master Plan shows this buffer and also the existing landscaping along the northern side of the cemetery, which will be retained and enhanced.</p>	
There is no evidence to support the employment area extension – it is too small to meet future needs.		No change. The principle of including an employment extension within LA5 was established through the Core Strategy. See the response above to objections from organisations concerning the size of the employment area extension.	No
There is no justification for locating the cemetery extension in the AONB, or for rejecting expansion adjacent to the existing cemetery.	S	No change. See the response above to objections from organisations concerning the location of the cemetery.	No
<p>Object to the proposed Gypsy and Traveller site because:</p> <p>1. The requirement was not included in the Core Strategy for LA5.</p> <p>2. Reasonable alternatives have not been considered.</p> <p>3. The basis of the decision as on which local allocations should accommodate Traveller sites is not clear and does not accord with Core Strategy Policy CS22 or Government guidance.</p> <p>4. It threatens the viability of delivery of LA5, but no evidence on the impact on viability has been prepared.</p> <p>5. The proposed location in the Green Belt and AONB is contrary to national policy and the evidence base for the Core Strategy.</p> <p>6. Emerging Government policy indicates that Traveller sites are inappropriate development in the Green Belt that are not outweighed by unmet need.</p>	S	<p>Point 1: No change. See the response above to objections from organisations and individuals concerning the proposed Traveller site.</p> <p>Points 2 and 3: No change. 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, 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)</p> <p>Feedback on these potential sites was sought as part of Site Allocations consultation in 2008. 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: http://www.dacorum.gov.uk/docs/default-source/strategic-planning/cabinet-reportofconsultation-q-t-2008.pdf?sfvrsn=0</p> <p>A brief summary of the process the Council has been through with regards to considering and assessing potential</p>	<p>No</p> <p>No</p>

		<p>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.</p> <p>The potential to extend the two existing Gypsy sites within the Borough (Three Cherry Trees Lane, Hemel Hempstead and Long Marston) has been considered and discussed with the Gypsy and Traveller Units 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.</p> <p>The Long Marston site is not ideally located in terms of access to services and facilities and is already considered to be of the 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. Nevertheless, the Council has approached the owners of land adjacent to the Long Marston site, to explore the potential for further expansion of this site. The owners of this land have responded by confirming their opposition to the site being expanded.</p> <p>Other sites suggested through the Pre-Submission consultation and also submitted as having development potential through the 'call for sites' process' have also been considered and discounted as realistic or appropriate options. A fuller explanation is set out in the Homes and Community Services Background Issues Paper. The text of the September 2014 version of this document has been updated to elaborate on the explanation previously given, as a result of representations received. New sites suggested have also been appraised.</p> <p>Point 4: No change. No evidence has been produced by the developer to demonstrate that the Traveller site would affect the viability of the delivery of LA5. The proposed Traveller site is about 100 metres from the proposed housing on LA5, so the Council does not consider that there will be a significant impact on the price of new homes on LA5.</p> <p>Points 5 and 6: Change required regarding Green Belt - retain the proposed Gypsy and Traveller site, but remove it from the Green Belt. No change required regarding AONB. See the response above to objections from organisations and individuals concerning the proposed Traveller site.</p>	SC1 SC7
<i>Landowners who agreed made the following comments:</i>			
Support acceleration of delivery of the site and its removal from the Green Belt.		No change. Support noted and welcomed.	No

ISSUE: Chapter 6 Housing – (h) Local Allocation LA6		
Number of people/organisations responding 5		
Supporting -		
Key organisations	2	
Individuals	0	
Landowners	0	
Total	2	
Objecting -		

Key organisations	1		
Individuals	1		
Landowners	1		
Total	3		
NOTE. The majority of local residents wishing to raise concerns regarding the LA6 development did so by responding to the consultation on the draft site master plan, which ran in parallel to that for the Site Allocations DPD. Please refer to separate Report of Consultation for a summary of issues raised and the Council's response.			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
<p>CPRE Hertfordshire raised the following issues:</p> <ul style="list-style-type: none"> LA6 and GB/12 not justified and housing needs should be reassessed through SHMA, SHLAA review and review of the Core Strategy. Insufficient justification for release of Green Belt contrary to Policy SA1. 		<p>No change. The role of the Site Allocations DPD is to deliver the policies of the Core Strategy; not to pre-empt the results of the technical work underpinning the content of any future Local Plan. The Core Strategy provides the strategic context for the Site Allocations DPD, including the local allocations, and it must have regard to this. The level of housing and need for the local allocations was tested through examination of the Core Strategy by an independent Planning Inspector. In finding the Core Strategy sound, the Inspector accepted the Council's approach to housing and the local allocations. Therefore, the principle of releasing land from the Green Belt through the local allocations has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered. This is supported by several recent High Court judgements (ref: Gallagher Homes Ltd and Lioncourt Homes vs Solihull MBC, Gladman Development Ltd vs Wokingham Borough Council and Grand Union Investments Ltd vs Dacorum Borough Council.</p> <p>The evidence prepared in support of the Core Strategy identifies a need for a total of 130 new homes in Bovingdon (see Place Strategy for Bovingdon). In setting this figure, the Council has taken time and care to identify what are considered, on balance, to be the most appropriate sites to bring forward for new housing. The decision to allocate the six Local Allocations for development has been taken in the context of the National Planning Policy Framework (NPPF). This requires, amongst other things, for Councils to '<i>positively seek opportunities to meet the development needs of the area</i>' (para 14); and '<i>boost significantly the supply of new housing</i>' (para 47).</p> <p>The decisions made regarding both the overall level of new homes and whether there should be any Green Belt releases to help deliver these new homes was discussed at the Core Strategy Examination. The Examination was presided over by a Planning Inspector independent of the Council, who was aware of the concerns raised by local residents over the scale, location and potential impacts of new homes planned; particularly with regard to the Local Allocations. However, the Inspector's Report concludes that the Green Belt housing sites were appropriate and are required to help meet the planned level of housing and local housing needs. It is important to note that the Inspector's main concern when weighing up whether or not to find the Core Strategy 'sound' or not, was if the Council had allocated <i>sufficient</i> land for housing, not if any of the Green Belt sites should be removed from the plan.</p> <p>The principle of releasing land from the Green Belt and bringing forward this site for housing and associated uses has therefore already been established. The role of the Site Allocations is not to reconsider the housing target set, or the Local Allocations identified in the Core Strategy, but to demonstrate how these will be delivered. In order to achieve this, it is proposed that all Local Allocation sites will be removed from the Green Belt and, as such, there is no conflict with Policy SA1 of the Site Allocations DPD.</p> <p>In terms of the early partial review of the Core Strategy, which was required by the Inspector, the Council are currently undertaking technical work to support this including a Strategic Housing Market Assessment, Strategic Housing Land Availability Assessment, Green Belt review and Economy Study. This work will then inform whether further sites need to be allocated, including that for additional housing to meet objectively assessed needs (where appropriate).</p>	No
<i>Organisations who agreed made the following comments:</i>			

<p>Thames Water Property Services – support the policy, but note that:</p> <ul style="list-style-type: none"> • Current waste water network in this area may not be able to support the demand from this development, without some local upgrading. • Drainage Strategy would be required from the developer. • Grampian condition required to ensure that the infrastructure is in place prior to occupation of the development. 	S	<p>Change required. Whilst there are concerns with the existing Waste water Treatment Works at Maple Lodge, the most recent update to the Infrastructure Delivery Plan (January 2014) identifies that existing and committed infrastructure provisions identified to date remain appropriate for the proposed level of growth set out within the Core Strategy. However, it was also acknowledged by Thames Water that more detailed modelling work for the Water Cycle Study is required to inform the next Asset Management Plan (AMP) for 2020-2025 and to inform residential development within the affected local authorities up to 2031. This will be addressed through the Infrastructure Delivery Plan Update for 2015.</p> <p>Within their representation, Thames Water has identified a number of proposed site allocations (including LA6) which will require the developer to complete an appropriate assessment (i.e. a drainage strategy) in preparation of any planning application to deliver these sites. In light of this, the Council have highlighted the need for developers to liaise with Thames Water (and any relevant other water company) at an early stage of the planning process. Where the Council has prepared Master Plans (i.e. for the Local Allocations) the planning requirements will be modified to identify the need for early liaison with infrastructure providers. Alternatively, where no master plan exists, developers will be advised to seek such engagement at the pre-application stage. The planning requirements for LA6 within the Site Allocations DPD and associated Master Plan will therefore be amended to require early liaison with Thames Water to discuss development of a Drainage Strategy. Such a strategy should, amongst other things, identify whether any infrastructure upgrades would be required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to meet additional demands and to support the timely delivery of this site. This approach will be supported by the use of Grampian Conditions where necessary to ensure sewerage issues are appropriately addressed prior to occupation of any permitted development.</p> <p>In order to address the issue of water supply and waste water infrastructure capacity on a more holistic basis across entire water catchment areas, the Council are engaging with, and assisting, Hertfordshire County Council to complete a comprehensive county-wide study of the water environment. This study seeks to identify areas of development constraint with regard to both potable water supply and waste water network and treatment capacity with the aim of identifying infrastructure solutions to enable planned growth. The study will form the basis of forthcoming technical work for the Council, with the conclusions of this work being available to support the early partial review of the Core Strategy (i.e. formation of the new single Local Plan for the Borough).</p> <p>Mindful of the objections raised by the Environment Agency in regard to the waste water infrastructure and the potential impact upon the environment, the Council will prepare a Statement of Common Ground in conjunction with Thames Water and the Environment Agency. This Statement of Common Ground will commit the Council to completing the above-mentioned technical work and to also confirm the use of appropriate planning requirements (as aforementioned) to ensure developers seek early liaison with Thames Water and to ensure development proposed within the Site Allocations DPD is deliverable without detriment to the environment.</p> <p><i>See also response to Chapter 18 – Monitoring.</i></p> <p>A related change covering Sustainable Drainage requirements is also needed to ensure the text reflects recent changes in responsibilities (MC39).</p>	<p>MC38 MC39</p>
<p>Natural England:</p> <ul style="list-style-type: none"> - Need for ecological survey updates noted. - Mitigation & biodiversity enhancement should be incorporated into development of the site. - Pedestrian and cycle access to Hyde Lane and Lancaster Road (thereby promoting sustainable development) welcomed. 		<p>No change. The requirement for surveys and additional supporting information, including any biodiversity or ecological mitigation or enhancement measures, is set out within the Master Plan for LA6. Specifically, the planning requirements are listed in paragraph 6.7 of the draft Master Plan document (September 2014) and require (inter alia) an Environmental Impact Assessment, a tree survey/Arboricultural report and protected species survey and assessment. Furthermore, the requirement for such supporting information would be a point of validation and material planning consideration at the planning application stage.</p>	<p>No</p>
Individuals			
<p><i>Individuals who disagreed made the following comments:</i></p>			

<p>Individual objects to Proposal LA6 raising the following:</p> <ul style="list-style-type: none"> • Housing demand estimates take no account of dwellings that become available through permitted office conversions. • Proposal LA6 is an extension beyond the village envelope which would not normally be permitted. • No requirement enshrined in NPPF which mandates Councils to build on Green Belt if they are unable to meet a 5-year housing land supply. 	<p>No change</p> <p><u>Office to Residential Permitted Development Rights:</u></p> <p>Before the Council considered the allocation of Green Belt land for housing, it needed to ensure it was making the best use possible of ‘brownfield’ sites (and greenfield sites that are not in the Green Belt). This included making informed assumptions about the levels and broad locations of brownfield land that it expects to come forward for development over the period which the Core Strategy covers (i.e. up to 2031). The starting point for this was the Strategic Housing Land Availability Assessment (SHLAA) and the information within this document has then been updated each year as part of the Council’s annual monitoring report (AMR). Other potential sources were also assessed and monitored as part of this process. These documents are available on the Council’s website and formed part of the evidence presented to the Core Strategy Examination. The Inspector who presided over the Examination into our Core Strategy considered the assumptions we have made about brownfield sites and how much housing they will deliver as part of the Examination process. He was satisfied that maximum use was being made of brownfield land and that in order to meet the Borough’s future housing need some release of Green Belt land for housing would be required. He was also satisfied that the Council had achieved an appropriate balance between the amount of new housing land proposed and the amount of land set aside for other uses, such as employment and retail.</p> <p>There are two critical factors to consider when assessing housing supply. Firstly, assumptions regarding supply should be <i>robust</i> and also acknowledge that the housing target should be considered as a minimum. If other sources of housing supply come forward over the plan period, then this helps provide a buffer and adds to the robustness of the housing programme (as required by paragraph 47 of the NPPF). Secondly, additional sources of supply such as changes of use through changes to permitted development rules add <i>flexibility</i> to the housing programme and add a further safeguard to ensure the target is delivered.</p> <p>In preparing the Site Allocations document the Council has looked carefully again at full range of housing sources including allocations, planning commitments and other potential sites, and assumptions on small windfalls. In preparing the housing programme, it has considered the extent housing from employment land could realistically contribute to the housing supply. The Council would acknowledge that there have been recent changes to the permitted development regime and other changes to national policy/guidance that potentially allow for more housing land to come forward in the future. However, their contribution is difficult to predict and thus quantify. For example, it is too early yet to understand the likely contribution from the conversion of offices to housing. National guidance generally seeks to limit the role of windfalls in assessing future supply in favour of identified sites or locations. Not all windfall sites are necessarily available for a variety of reasons and should only be included if there is a reasonable prospect of them being delivered. They would in any event be identified through regular monitoring processes, particularly in monitoring planning commitments. It may be possible in the future to better identify and test their contribution through the full update of the Council’s Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Office to residential conversions and other forms of windfall would not remove the need for the Local Allocations, which make a significant contribution (1,595 homes in total) to the housing programme. Local Allocations have an important strategic and local role that windfalls cannot readily fulfil (see para. 14.22 of the Core Strategy). They also provide greater certainty in the housing supply, particularly in the future where it is difficult to predict and identify windfalls and where opportunities in the urban areas are likely to decline.</p> <p>The Core Strategy Inspector’s Report concluded that the Council was not planning to meet the Borough’s full objectively assessed need for housing. However, he concluded that, subject to the recommended modifications, the Council’s overall approach to housing provision was sound. The modifications (which were accepted by the Council) included a commitment to an early partial review of the Core Strategy, which will identify the full objectively assessed needs for market and affordable housing and assess whether or not those needs can be met.</p> <p>Given the above points, the Council considers that the Local Allocations remain an essential part of the housing programme and must be retained.</p> <p><u>LA6 Location:</u></p> <p>Bovingdon is identified as a large village in accordance with the settlement hierarchy of the Core Strategy (Table 1).</p>	<p>No</p>
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Individuals who agreed made the following comments:			
-		N/A	No
Landowners			
Landowners who disagreed made the following comments:			

<p>Whiteacre Property & Development Ltd (who represent the owners of Grange Farm) raised the following reasons/issues:</p> <ul style="list-style-type: none"> • LA6 does not meet the full requirement of the Core Strategy and fails to meet needs of Bovingdon (i.e. providing 60 and not 130 new homes); • There is no evidence that windfall sites can deliver the shortfall of 70 dwellings based on an assessment since the 2008 SHLAA. Furthermore, other non-housing requirements are highly unlikely to be delivered by windfall sites, such as open space, a care home, allotments and a new school site. • LA6 should be retained to address the inevitable car parking shortfall related to the prison expansion. • Grange Farm has been shown to be capable of delivering all of the adopted Core Strategy requirements for Bovingdon in one location, as per our masterplan submitted with the Call for Sites. • The Master plan is deficient for the following reasons: <ul style="list-style-type: none"> - It shows only 60 homes, not the 130 homes required by the Core Strategy; - It does not show a residential care home site; - It fails to provide additional open space required for Bovingdon; - It does nothing to address the High Street issues; - It does not show allotments which also emerged as a requirement in the early stages of the Core Strategy; - It omits the provision of a site for a new nursery or infant school; - Trees which surround the site have not been accurately surveyed or assessed as required by BS5837:2012. Once required root protection zones are plotted the net developable area will reduce and with it the number of homes provided; - Layout does not show individual dwellings, car parking or gardens; and - There is no accommodation schedule setting out the dwelling mix, sizes or house types. 	<p>Change required. The principle of development at LA6 has been established in the Core Strategy which was the subject of independent examination. This site will incorporate 60 new homes and provision of open space. See responses above relating to the principle of development in this location.</p> <p><u>Number of Units:</u></p> <p>The Bovingdon Place Strategy does identify a local objective to provide 130 new homes between 2006 and 2031; however, referring to housing completions between 2006 and 2014 (as set out within the Annual Monitoring Reports and Housing Land Position Statements over this same period), 20 dwellings have already been completed within the current plan period. This leaves a shortfall (taking account of 60 new homes to be provided by LA6) of 50 homes required over the next 16 years (i.e. 2015-2031). Based upon 20 completions over the preceding 8 years, it is not unreasonable to expect 50 new dwellings to be delivered over the remaining plan period including those which may come forward through the planning system as windfall sites. Furthermore, the need for additional homes will be reconsidered through the early partial review of the Core Strategy in terms of identifying objectively assessed needs for the entire Borough. The Site Allocations DPD does not seek to specifically identify all future housing and development sites. The Housing Programmes assumes that unidentified sites (i.e. less than 10 units) and windfall sites will continue to play a significant role in overall supply.</p> <p>The Council considers that paragraph 67 of the Inspectors report following examination of the Core Strategy has been misinterpreted by the objector. The objector asserts that LA6 is not adequate as it does not provide the total new homes required for Bovingdon as set out in the Place Strategy (i.e. 130). It is clear from the Inspectors Report that he was in fact referring the capacity of the site off Chesham Road itself and states that this site can physically provide the homes and open space proposed as part of that LA6 proposal (i.e. 60 homes and open space around the balancing pond). In doing so, he states the following (extract below) and also refers to the forthcoming review of the green belt which will enable the Council to reconsider potential opportunities within the village to accommodate longer term growth.</p> <p><i>‘...the local allocation at Chesham Road/Molyneaux Avenue is supported by the Parish Council and, on balance, by local residents. Although concerns were expressed by the representors regarding the ability of the site to satisfactorily accommodate the housing and open space, the Council is confident that the proposed uses could be comfortably provided and there was no substantive evidence to conclusively demonstrate otherwise.’</i></p> <p><u>Social and Community Facilities:</u></p> <p>There is no requirement within the Core Strategy for a new primary school to serve the village. The LA6 site will provide an area of public open space. Allotments are not listed within the Bovingdon Place Strategy (in the Core Strategy) as a local objective. Such a use is an appropriate use within the Green Belt, so if there is a need they can potentially be provided outside of the village boundary. Accommodation for elderly persons can potentially be provided as part of the dwelling mix on LA6, or alternatively on another (unallocated) development site within the village, should there be market demand.</p> <p><u>Car Parking:</u></p> <p>With regard to the use of the site for additional car parking associated with the prison expansion (planning permission no. 4/01994/12/MFA granted in March 2013), the permitted development will provide 80 additional car parking spaces within two new car parks at the existing prison site. This was considered reasonable and proportionate by the Council (in consultation with Hertfordshire County Council as the Local Highway Authority) taking account of the additional staff and visitors that would result from the proposed expansion and the conditioned commitment to operate a parking management plan. Therefore, as advised throughout the Site Allocations process, the site now known as LA6 is not required by the Ministry of Justice in connection with the prison expansion and its development would not impact upon the operation of the prison. However, clarification should be provided in respect of Policy LA6 with regard to the provision of vehicular crossovers for properties facing onto Checham Road (MC37).</p> <p><u>Relative Merits of Grange Farm Site:</u></p> <p>Turning to Grange Farm (and other sites considered prior to proceeding with the LA6 proposal). The Assessment of</p>	<p>MC37</p>
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		<p>Potential Local Allocations & Strategic Sites Final Assessment (2012) considered Grange Farm, and although it noted that this alternative site had its advantages, it was not considered appropriate to progress to the Site Allocations DPD (over and above the Chesham Road/Molyneaux Avenue site) because:</p> <ul style="list-style-type: none"> • It would have a significant impact on the purpose of including land within the Green Belt, particularly urban sprawl beyond existing boundaries and significant encroachment into the countryside (as identified by the Inspector at the Local Plan Inquiry); • It would break an important existing village boundary at The Moody Estate); • Development of the site would affect the character of 2 listed buildings adjacent to the site (off Chesham Road); • It is an important wildlife site; and • The site is remote from the village/local centre. <p>Therefore, on balance, it was recommended that the eastern section of Option 4 (i.e. to the east of Molyneaux Avenue) is the preferred local allocation (Core Strategy Examination in Public, Issue Paper 14: Bovingdon) because development of this site would not lead to the extension of the urban area boundary and would have a limited impact on the Green Belt (Assessment of Potential Local Allocations & Strategic Sites Final Assessment 2012). This decision was supported by the Core Strategy Inspector.</p> <p><u>Master Plan Omissions:</u></p> <p>The Council considers that all issues listed by the respondent are appropriately covered within the master plan. Detailed layout, tree protection measures, car parking and mix of dwelling types will be determined through the development management process when a planning application is prepared and submitted for consideration by the Council. In terms of the provision of a new school, HCC have informed the Council through the Site Allocations consultation and iterations of the Infrastructure Delivery Plan that the existing primary school can accommodate the proposed growth through its latent capacity. Secondary School places will continue to be met in Hemel Hempstead (and in Chesham to a lesser degree).</p> <p><i>See responses to LA6 master plan in separate Report of Consultation for detailed consideration of master plan coverage.</i></p>	
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No
<i>Other comments from Landowners:</i>			
-		N/A	No
Other new sites and/or designations			No
<ul style="list-style-type: none"> • Grange Farm (see above) 			

ISSUE: Chapter 7 - Meeting Community Needs

Number of people/organisations responding 16

Supporting -

Key organisations	4
Individuals	0
Landowners	0

N.B Berkhamsted Town Council and Sport England have supported some policies/paragraphs and objected to others, so they are included in the tally once for each support and object

Total		4		
Objecting -				
Key organisations		6		
Individuals		5		
Landowners		3		
Total		14		
Issue / Summary of Comment		New / Significant?	Response	Amendment required?
Organisations				
<i>Organisations who disagreed made the following comments:</i>				
Confirmation that the issue of the 2 additional reserve primary school sites at Hemel Hempstead will be dealt with as part of the early partial review of the Core Strategy.			<p>Change required. The technical work associated with the early partial review of the Core Strategy, as well as the forthcoming update to the Infrastructure Delivery Plan, will identify existing and required primary school capacity within Dacorum with the assistance of the Hertfordshire County Council as Local Education Authority. Once the scale and location of need for additional capacity and/or new schools has been identified, including that required within Hemel Hempstead, the Council will work with the County Council to identify new primary school sites if necessary, and facilitate their delivery via S106 agreements and/or the Community Infrastructure Levy (CIL) as appropriate.</p> <p>The need for additional school provision in east Hemel Hempstead is identified in paragraph 7.10 of the Site Allocations document. However, clarification should be added to the text to indicate that phase 2 of the Spencer's Park development will incorporate a new two-form entry primary school (MC61). Additionally, in order to enable flexibility to allow schools to expand appropriately to accommodate changing educational needs, Policy SA10: Education Zones should be amended to allow the provision of facilities ancillary to the education uses (SC9).</p>	MC61 SC9
Confirmation that the identified requirement for 2 forms of entry of primary school capacity to serve housing development in east Hemel Hempstead excludes the needs arising from residential development planned within St Albans City & District to the east of Hemel Hempstead.			<p>No change. The Council has engaged with St Albans City & District Council as part of its Duty to Cooperate. However, the additional school capacity required at east Hemel Hempstead arises from future housing in northeast Hemel Hempstead and the Council works with Hertfordshire County Council as Local Education Authority to ensure sufficient school places are provided for the population and future growth.</p>	No
Error in the identification of EZ/3 at North West Berkhamsted on page 79 of the Map Book.			<p>Change required. It is noted that a mapping error has resulted in the proposed new Education Zone identified in the Map Book not according with the area identified within the Berkhamsted Place Strategy within the adopted Core Strategy (Figure 23 and paragraph 21.4). Within the Place Strategy the land to the northwest of Bridgewater School is also identified to provide one of the two primary schools required in Berkhamsted. An amendment is therefore required to the boundary of EZ/3 to ensure the site allocation includes the reserve site to the northwest of Bridgewater School and continues to reflect the area shown in the Core Strategy.</p>	MC62
Delivery of new detached playing fields for Tring School.			<p>Change required. Within the Tring Place Strategy of the adopted Core Strategy, it is recognised that the expansion of Tring Secondary School may be necessary over the plan period to accommodate local growth through proposed housing, including that at LA5. The Council has also sought updated information from Officers at the Children's Schools and Family Unit at Hertfordshire County Council regarding schooling issues in Tring. This information shows a predicted surplus of 27 primary school places for 2015/16, 52 for 2016/17 and 44 for 2017/18. This is out of a total reception place capacity of 200 spaces across the town. In terms of secondary school capacity, there is predicted to be a small deficit of places in the period 2017/18-2021/22 of between 1 and 15 places. Before and after this period there is expected to be a small surplus.</p>	MC60 SC10

		Through their representations, Hertfordshire County Council is satisfied that the Site Allocations DPD provides appropriate reference to future school capacity issues in the town. Both the Site Allocations DPD and Core Strategy refer to the potential for the secondary school to expand on its existing site and to the provision of detached playing fields to facilitate this expansion (see paragraph 22.4 of the Tring Place Strategy which identifies the need to provide additional detached playing fields). Therefore a modification is required to the Site Allocations DPD to (a) identify the location of these detached playing fields on the Policies Map to safeguard playing field provision for the school in the event that it is required following expansion of Tring Secondary School (b) add a new proposal to the Schedule of Leisure proposals and Site to cover this designation and (c) to amend Policy SA10 to incorporate provisions to permit facilities ancillary to education uses.	
<p>The Site Allocations DPD is not considered to be sound as it relies upon the Outdoor Leisure Facilities Study Assessment Report (September 2014), in terms of allocating future outdoor sport and recreation facilities, which does not provide any recommendations for improved and/or new facilities to meet current and future needs.</p> <p>Specific issues:</p> <ul style="list-style-type: none"> - Insufficient evidence base to justify Proposal MU/5 at Bunkers Park, Nash Mills and Proposal L/2 at Durrants Lane/Shootersway, Berkhamsted. - Durrants Lane and Bunkers Park are not considered sufficient to meet current needs. - Unclear how future needs will be met in association with housing proposals due to lack of Action Plan. - Once completed, the Action Plan should inform new site allocations, where necessary, to meet needs. 		<p>Change required. The Outdoor Leisure Facilities Assessment Report (published September 2014) provides an assessment of the Borough's existing outdoor leisure facilities only and summarises where certain sporting facilities are lacking. The follow-up Playing Pitch Strategy & Action Plan, to be completed by late spring / early summer 2015, formulates sport-specific recommendations based on supply and demand and then identifies existing facilities within the Borough that require improvement or will identify the need for new facilities.</p> <p>The text within the Site Allocations DPD with regard to this work would benefit from further clarity and should be amended accordingly. Paragraph 7.12 currently reads:</p> <p><i>'The Borough contains a variety of leisure space and facilities which will be safeguarded. Technical work has been used to assess the scale and nature of any future needs, both in terms of <u>indoor facilities</u> 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).'</i></p> <p>The above mentioned report only assesses outdoor leisure facilities (e.g. playing pitches); and the purpose of the assessment report was not to conclude with recommendations on additional outdoor leisure facilities to be designated, this will be the aim of the forthcoming Playing Pitch Strategy and Action Plan.</p> <p>It is therefore proposed to amend paragraph 7.12 to convey that the Outdoor Leisure Facilities Assessment Report has highlighted the demand, supply and requirement for such facilities. The Playing Pitch Strategy and Action Plan will identify recommendations for improvements to and/or new playing pitches required within the Borough. This subsequent technical work will inform the Early Partial Review of the Core Strategy.</p>	MC67
<p>Schedule of Leisure Proposals and Sites – Proposal MU/6</p> <ol style="list-style-type: none"> 1. Propose additional text that 'large scale development, including to support the playing field, would remain inappropriate in the Green Belt.' 2. Allocation of allotments at this site. 		<p>1. No change. Any planning application for development on playing fields would be considered against national planning policy and relevant development plan policies, including that relating to the Green Belt. The principle of the proposed site allocations L/2 and MU/6 should remain unaltered as it seeks to provide new, replacement playing fields and new leisure space as part of Proposal SS1 set out in the Core Strategy (which was adopted in September 2013).</p> <p>2. No change. Proposal MU/6 allocates land for mixed use, including the delivery of 150 new homes, replacement playing fields and new leisure space. Development of this site will be guided by the requirements set out in Proposal SS1 in the adopted Core Strategy and associated master plan. This new leisure space may include scope for a new allotment; particularly as the master plan for the site has identified a small part of the land to the west of Durrants Lane which could be made available for community allotments should local demand warrant it. However, formal designation does not need to be made as allotments are usually considered to be an acceptable use in both designated open land and Green Belt. Provision can therefore be considered as part of the current scheme if required. As such, the proposed site allocation is sufficient to safeguard the site for potential allotment space.</p>	No

Map Book: Proposal EZ/1 not included within the Council's Strategic Flood Risk Assessment (SFRA) for Hemel Hempstead and Berkhamsted which forms basis for applying the Exception Test.		No change. It is acknowledged that Proposal EZ/1 at Nash Mills was not specifically considered within the Level 2 Strategic Flood Risk Assessment (SFRA) for Berkhamsted and Hemel Hempstead (completed in 2008); however, this would not necessarily prevent the site being allocated for educational use. Should a planning application come forward to develop this site, any applicant will be required to complete a site-specific Flood Risk Assessment, which may include application of the sequential and exception tests, in accordance with the NPPF and national Planning Practice Guidance. This will seek to appraise the site in terms of flood risk (from fluvial and surface water) and identify appropriate mitigation to ensure the sustainability of any proposed development). Such an assessment would be reviewed by the Council in consultation with the Environment Agency and Lead Local Flood Authority.	No
<p>Tring Sports Forum object to the DPD raising the following issues:</p> <ol style="list-style-type: none"> 1. The proposed sports provision for Tring is inadequate and not based on a robust and credible evidence base. 2. Locating new pitches at Icknield Way/LA5 would not be sound and would perpetuate existing problems experienced by Tring Tornadoes Juniors Football Club – lack of playing fields with multiple pitches. 3. Availability of CIL from LA5 to invest in sport in Tring. 4. Need for additional hockey and artificial football and rugby training pitches (3G/4G). 5. Suggested revisions to paragraphs 7.12 and 7.13. 		<p>No change. See above comments regarding the Outdoor Leisure Facilities Study Assessment report (September 2014) and forthcoming Playing Pitch Strategy & Action Plan.</p> <p>With regards to the provision of leisure and recreational facilities in Tring, the Council's Outdoor Leisure Facilities Study Assessment Report (2014) identifies an overplay of some pitches within the area, specifically rugby pitches, and the need for an additional artificial grass pitch (3G) within Dacorum. Whilst the forthcoming Playing Pitch Strategy & Action Plan will identify specific leisure requirements throughout the Borough, the proposed local allocation LA5 includes the provision of additional leisure space which could be utilised by existing sports clubs or the local community within Tring. Additionally, as advised by Hertfordshire County Council, there is a need for Tring Secondary School to expand to meet future growth and to accommodate this, the Council has sought to allocate detached playing fields for Tring Secondary School and for community use at Dunsley Farm off London Road (see MC60 and SC10).</p> <p>Paragraph 7.12 of the Written Statement document has been amended to clarify the purpose of the Outdoor Leisure Facilities Study and subsequent Playing Pitch Strategy & Action Plan.</p>	No
<p>Concerns raised regarding paragraph 7.16 relating to former St Mary's Convent, Green End Road, Boxmoor:</p> <ul style="list-style-type: none"> • The DPD is not supported by credible evidence, lacking a robust assessment of Open Land designations. • Open Land Policy 116 expired in 2011 therefore various open land designations should be omitted from the DPD. • The Open Land designation at St Mary's convent site does not meet the criteria set out in paragraph 74 of the NPPF and should be deleted from the DPD. 		<p>No change. The site at St Mary's convent in Boxmoor was designated as Open Land within the Dacorum Borough Local Plan (1991-2011) and Policy 116 of that Plan remains extant despite adoption of the Core Strategy, as it is a 'saved' policy (see Appendix 1 of the Core Strategy for a list of those Local Plan policies that have been superseded). Additionally Core Strategy Policy CS4 states that in open land areas the primary purpose is to maintain the generally open character. Whilst this does not preclude development entirely it does emphasise the need to protect existing designations, where appropriate, which is supported by the development principles set out in Local Plan Policy 116.</p> <p>The effectiveness and relevance of Local Plan Policy 116 will be reassessed when the Council prepares its New Local Plan or drafts a Development Management DPD. Nevertheless, the Background Issues paper on Providing Homes and Community Services states that there is a presumption against removing the designation of Open Land to enable future development of any sites (paragraph 7.9) but continues to state that designation also seeks to protect land over 1ha in an area where it makes a significant contribution to the form and character of the settlement. In the case of St Mary's convent, the designated Open Land (incorporating the convent, St Rose's Infant School and adjacent allotments) is considered to fall within the definition of private open space as set out within the Open Space Study (2008) and forms a green wedge between Green End and Chaulden in the west of Hemel Hempstead Text supporting saved Local Plan Policy 116 in particular notes the effect this open space has in breaking up the built up area. This is the first instance a representation has been received questioning the ongoing value of retaining this particular site as Open Land and therefore, the Council has had no cause to reassess this site 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.</p> <p>During examination of the Local Plan in 2002 the Inspector identified the importance of retaining open space within</p>	No

		<p>towns and does not advocate the infilling of green spaces within towns as a matter of course. He therefore concluded that there were no defined open spaces (as set out in the Local Plan) suitable for development. Subsequently, the Inspector then goes on to recognise that social and community uses are appropriate in principle on open land.</p> <p>As such, the principle of removing the existing open land designation does not appear to be supported by evidence, past and present, and in response to the representation, the above-mentioned development plan policies still apply. An Open Land designation does not preclude development and it may be appropriate for part of this site to be brought forward for development in the future. However, any such development should seek to provide an appropriate scale, density and layout that maintains the open characteristics of the site, its relationship to adjoining open uses and the green separation between the surrounding urban areas of Hemel Hempstead.</p> <p>The Council will consider whether it is appropriate to reassess existing Open Land designations and policies through the early partial review of the Core Strategy and preparation of the New Local Plan.</p>	
<i>Organisations who agreed made the following comments:</i>			
Proposal L/2 Durrants Lane/Shootersway is supported as it would provide new community playing fields and help to meet current and future needs as identified within the Outdoor Leisure Facilities Assessment Report (2014).		No change. Support welcomed.	No
<p>Proposal L/1 is supported.</p> <ul style="list-style-type: none"> - Recommendation for shared surface at footbridge within Jellicoe Water Gardens opposite existing Bus Station to encourage east/west movement. - Multi-screen cinema proposed within Town Centre Masterplan – issue regarding type of building creating a blank façade to the public realm. - Issue concerning scale of new buildings within Gade Zone. 		No change. The issues raised would be considered through the determination of relevant planning applications for the Water Gardens restoration, any new multi-screen cinema and other buildings within the Gade Zone. This concern does not affect the proposed allocations within the Site Allocations DPD.	
Map Book: Support designation of Open Land at Edgeworth House, Berkhamsted (Proposal OL/5).		No change. Support noted.	No
<p>Natural England:</p> <ul style="list-style-type: none"> - C/1 – acknowledge site in AONB – Chilterns Conservation Board to be consulted on measures to mitigate impact. - C/2 – acknowledge site in AONB and proposals relate to entire redevelopment of site (monastery). - L/3 – acknowledge site in AONB 		<p>Change required. The following modifications are proposed to reflect the comments received:</p> <ul style="list-style-type: none"> a) For C/1 – incorporate reference in the planning requirements for the site to the need for the Chilterns Conservation Board to be consulted (MC63); b) For C/2 – planning requirements are considered to be sufficient in Site Allocations DPD but to be strengthened by a cross-reference to Chilterns Conservation Board advice being sought at design stage and the Chilterns Buildings Design Guide and associated Technical Notes being referenced (MC64); c) For L/3 – incorporate reference to the need to consult the Chilterns Conservation Board into the planning requirements for site (MC68). 	<p>MC63 MC64 MC65 MC66 MC68 SC11</p>
Individuals			
<i>Individuals who disagreed made the following comments:</i>			

Reduced freeholder rights to extend or alter private property due to proposed continuation of the Open Land designation on land off Woodhall Lane, Hemel Hempstead, .		No change. Land between Highfield and Adeyfield was designated as Open Land through adoption of the former Dacorum Borough Local Plan and the Site Allocations DPD proposes to retain this designation as it forms an important green, open space between two suburbs of Hemel Hempstead.	No
No local consultation and local infrastructure provisions have not been considered effectively (schools, doctors and traffic).		<p>No change. Proposals within the adopted Core Strategy, and subsequently the Site Allocations DPD, have been formulated in consultation with various service and infrastructure providers, including Hertfordshire County Council as the Local Education Authority and Local Highway Authority, NHS England and Clinical Commissioning Groups, in order to ensure sufficient capacity is available or identify where it might need to be provided. This data is evidenced and updated annually within the Council's Infrastructure Delivery Plan (InDP).</p> <p>The InDP looks at current capacities, what will be required to meet the demand generated by new residents and how any shortfalls in provision can be addressed. Whilst prepared by the Borough Council, the InDP is prepared in consultation with, and using information and advice provided by, a wide range of infrastructure providers. Information regarding doctors' surgeries was provided by the Herts Valley Clinical Commissioning Group.</p> <p>The InDP is updated regularly (usually on an annual basis). The current (2015) update has been timed to take account of concerns regarding infrastructure issues raised through the Site Allocations Pre-Submission consultation and provide an opportunity to discuss these further with providers. This revised version of the InDP will accompany the Submission version of the Site Allocations DPD. This update will ensure key infrastructure concerns are raised with providers and any necessary amendments made to the DPD and accompanying Local Allocation master plans to ensure these are properly addressed.</p> <p>The Council is also aware that Tring Secondary School, Hemel Hempstead School, The Cavendish School and Astley Cooper School have all been successful in bidding for, and will receive, Priority School Building Programme funding as notified by the Education Funding Agency in February 2015. This will assist in addressing infrastructure requirements as a result of proposed site allocations.</p> <p>Both the Site Allocations DPD and the Core Strategy, which sets out the level and broad location for new development within the Borough, have been subject to considerable public consultation: with infrastructure providers and members of the public. A full summary of this consultation is contained in the relevant Reports of Consultation and Report of Representations. All of these documents are published on the Council's website and their content has been reported to Members at the appropriate time.</p>	No
Map Book: Proposal EZ/3 not justified, effective or consistent with national policy.		No change. Objection noted – no reasons given to respond to.	No
<p>Map Book: Site OL/5 contrary to Core Strategy Policy CS4 and Local Plan Policy 9 which supports housing growth in 'residential areas in towns and large villages'. The land associated with OL/5 should be retained for housing as originally designated.</p> <p>Site Allocations (OL/5) is not sound as the proposed designation is not appropriate in planning terms for the following reasons:</p> <ul style="list-style-type: none"> - Proposed designation of contrary to advice contained within DBC's Open Space Strategy (2008) – specifically paragraph 1.6 and details contained within Appendix 4. 		<p>No change. This land is not, as the objector implies, allocated for housing in the current Dacorum Borough Local Plan 1991-2011. Land associated with Edgeworth House is identified as a residential area within a town or village as set out within the adopted Proposals Map. The representation refers to Local Plan Policy 9 in support of this designation which states that appropriate residential development is encouraged in residential areas. However, upon adoption of the Core Strategy (September 2013), Policy 9 was superseded by Core Strategy Policy CS4. Nevertheless, Core Strategy Policy CS4 similarly encourages residential development in residential areas within towns such as Berkhamsted.</p> <p>Additionally, the site has previously been suggested for housing/flatted development within the Area Based Policies SPG (May 2004) subject to impact upon the setting of this heritage asset. This SPG is extant and remains a material</p>	No

<ul style="list-style-type: none"> - Land previously allocated for housing around Edgeworth House has been forfeited in favour of alternative of Green Belt sites which does not accord with the NPPF. - Lack of justification for the designation of Edgeworth House as Open Land and the Council's view that there is a deficit of open land to the west of Berkhamsted. Recommendation contrary to Officer's assessment within Appendix 4 of the Background Issues paper 'Providing Homes and Community Services'. - Reason for designating Open Land includes location within the flood plain – small percentage of site within floodplain and has not flooded in 35 years. - Lack of communication from DBC and Berkhamsted Town Council regarding the proposed designation. - Edgeworth House is included within character area BCA17, as identified in the Area Based Policies Supplementary Planning Guidance (May 2004), where the general approach is to maintain the defined character of the area with the exception of greenfield development. Specifically the SPG refers specifically to the possibility of new development within the grounds of Edgeworth House, subject to its impact on the setting of the Listed Building, and later states that flatted development may be appropriate within the site. - The part of the site nearest the canal (i.e. to the north of the River Bulbourne) only measures 5698m². The Core Strategy defines Open Land as 'Areas of open space greater than 1ha in size'. The site therefore falls short of the size required for formal designation. - The site does not have an open appearance when viewed from public land as it is enclosed by walls, dense hedgerows and undergrowth, and Edgeworth House itself. The land is not utilised and does not contribute to the town. - The site is in a sustainable location and ideal for residential development – walking distance from local shops and services – and accords with the principles contained within the NPPF (paragraphs 47, 49 and 50) and Local Plan Policy 9 and Core Strategy Policy CS4. 		<p>consideration in the determination of any planning application, including situations where it could come forward as a windfall site.</p> <p>The Dacorum Open Space Study (2008), which was used as evidence to inform the adopted Core Strategy, identifies the opportunity to designate part of the Edgeworth House site nearest the canal as Open Land (report sections 6.3 and 10.2). Although recognising a high level of school sport facilities and natural green spaces, the report then goes on to state that a deficit of open spaces exists within Berkhamsted (amounting to 16.75ha) when compared to the 2.8ha per thousand people standard set out in the Local Plan (saved Local Plan Policy 73 remains part of the development plan for Dacorum).</p> <p>Since preparation of the above-mentioned SPG and adoption of the Core Strategy, the Site Allocations DPD has been prepared using an updated evidence base in the form of the Background Issues Paper – 'Providing Homes and Community Services' (2014). Within this it is recommended that Edgeworth House be designated as new Open Land. Whilst there is an error within Appendix 4 of the Background Issues Paper (which will be rectified ahead of submission of the Site Allocations DPD for examination), the Council has reviewed the appropriateness of the proposal to designate this site as Open Land in response to objections.</p> <p>The purpose of designating Open Land is to safeguard land of public value, including not just land, but also areas associated with the Borough's water environment (i.e. rivers, canals, lakes and reservoirs) which offer opportunities for sport and recreation or that are important in terms of visual amenity or nature conservation (taken from the NPPF). In addition to this purpose, the Council's strategy for designating Open Land as set out within the Open Space Study (2008) is to recognise and protect landscape features; and to enhance local character and support distinctive urban form (i.e. neighbourhood structure, green wedges, green chains, structure of environmental areas and contribution to special character e.g. Listed Buildings).</p> <p>The site falls within the curtilage of an existing residential property within the built-up area of Berkhamsted and sits between residential development (to the northwest) and land allocated for conversion from employment to housing (to the southeast). 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 1.6ha and therefore above the 1ha threshold for open land designations) adds value to the setting of this heritage asset and makes an important contribution to the character and appearance of the listed building. Specifically, the garden forms part of the original property once occupied and used by novelist Maria Edgeworth. Furthermore, 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. Therefore it is considered appropriate to retain the proposed extent of OL/5 as an Open Land designation as set out within the Site Allocations DPD.</p> <p>The Council also wishes to note that an Open Land designation does not entirely preclude development at this site and, as previously considered within the Area Based Policies SPG (2004) some form of development at this site could be considered acceptable in the future provided it did not detrimentally impact upon the setting of the heritage asset and retained the open character of the site and adjacent Grand Union Canal.</p>	
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<p>Policy SA1 – Harrow Estates object:</p> <ul style="list-style-type: none"> - Lack of site allocation for off-site provision of playing fields to serve the secondary school (Tring) in line with Core Strategy; - Lack of site allocations for open space and recreational facilities in the town (Tring). 		<p>Change required. The Modifications report (January 2013) that followed the examination of the Core Strategy highlighted the need to provide detached playing fields in order to accommodate extension to Tring School (MC187). This reference was then transposed into the Core Strategy. Specifically, paragraph 22.4 of the Tring Place Strategy states: <i>‘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.’</i> This proposal needs to be fully reflected in the Site Allocations DPD, through a proposal in the Schedule of Leisure proposals and Sites and through an amendment to the Policies Map (SC10 and SC12).</p> <p>See also previous response above regarding delivery of new detached playing fields for Tring School.</p> <p>The Council’s Open Space Study (2008) identifies that Tring is home to the only regional park within the Borough (Tring Park) but, with a relatively large proportion of open space is contained within schools and private sports clubs, the town experiences an overall deficit of 8.895ha of leisure space. Local allocation LA5 at Icknield Way in west Tring incorporates the provision of informal leisure and recreation space within the western fields of the site which has the potential for a mixture of parkland, informal open space, play area for toddlers and outdoor playing pitches on part of this land (MC33). Additionally, as aforementioned, in the event that Tring Secondary School expands to meet future demand in education provision, the Council have recognised the constraints at the school’s current site and therefore the need to allocate land for detached playing fields. As identified elsewhere within this document, the Council are proposing to allocate land at Dunsley Farm for such uses which would also contribute to local community demands for additional leisure and recreational facilities within the town (SC10 & SC12).</p>	<p>MC33 MC60 SC10 SC12</p>
Individuals who agreed made the following comments:			
-		N/A	No
Landowners			
Landowners who disagreed made the following comments:			
<p>Proposal C/2 Amaravati Buddhist Monastery:</p> <p>The site allocation is broadly supported but requests that two amendments are made to make the document sound and to enhance the spirit of the policy:</p> <p>1. The wording of the policy supports redevelopment of the site but could be amended to better reflect the objectives of the Masterplan (prepared by Rolfe Judd) and enable required improvements to make buildings fit for purpose. Suggested wording:</p> <p><i>‘Phased approach to redevelopment of existing built footprint of previously developed part of the site. The design, layout and scale of the 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. Existing landscape being features to be retained, and where appropriate, enhanced. Replacement of some of the existing buildings within the built footprint of the site defined site boundary (as shown on the proposal map) is acceptable provided they are of a high quality of design. Significant</i></p>		<p>Change required. Following further consideration of the site, a meeting with the Monastery’s planning advisers and the grant of planning permission for part of the site, it is recommended that minor modifications are made to this proposed designation. This will enable it to better reflect the needs of the religious community, whilst also recognising the important landscape constraints which continue to apply to the site.</p> <p>1. The key elements of the revised approach include:</p> <p>a) Reference to ‘previously developed part of the site’ as opposed to the ‘built footprint’;</p> <p><i>As discussed at the Council’s meeting with Rolfe Judd in September 2014, it was agreed that reference to the built footprint within Proposal C/2 may be restrictive in regard to the accepted principle of redevelopment of the site and could therefore inhibit the design of improved facilities to meet the Monastic community’s needs. Change required as suggested wording – minor modification.</i></p> <p>b) Wholesale replacement of buildings as opposed to ‘some of the existing buildings’; and</p> <p><i>Mindful of the fact that the site is located within the Chilterns AONB and designated Rural Area (and that Core Strategy Policies CS7 and CS24 should be taken into account), the Council would not support the suggested wording which would essentially enable a wholesale redevelopment of the monastic site, including buildings which may currently be fit for purpose (i.e. the temple). No change.</i></p> <p>c) Insertion of some flexibility regarding any future intensification in the use of the site for social and community purposes.</p> <p><i>Given the countryside location (Chilterns AONB and Rural Area), intensification would not usually be</i></p>	<p>MC64 MC66</p>

intensification of current activities on the site is not likely to be acceptable.		appropriate, but can be considered on an application by application basis. No change.	
2. Site development boundary line – the north-west part of the site contains existing buildings and has been omitted from Proposal C/2. Inclusion of this area would provide sufficient flexibility to achieve objectives of the Masterplan and to improve the appearance of buildings and relationship with the open space.		2. The proposed inclusion of land to the north-west of the site within the defined developed area is acceptable as it includes existing buildings and structures ancillary to the community use. <i>Change required to Map Book C/2.</i>	
Landowners who agreed made the following comments:			
-		N/A	No
Other comments from Landowners:			
-		N/A	No

ISSUE: Chapter 8 - Enhancing the Natural Environment			
<div>Number of people/organisations responding2</div> <div><div>Supporting -</div><div><div>Key organisations2</div><div>Individuals0</div><div>Landowners0</div><div>Total2</div></div></div> <div><div>Objecting -</div><div><div>Key organisations0</div><div>Individuals0</div><div>Landowners0</div><div>Total0</div></div></div>			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			
-		N/A	
Organisations who agreed made the following comments:			
Appropriateness of strategic objectives		No change. Support welcomed. These strategic objectives were established through the Core Strategy and are carried forward to the Site Allocations document for consistency. It is helpful to know that Natural England feel that they continue to warrant support.	No

Support for the recognition of: <ul style="list-style-type: none"> the importance of the AONB; proposed protection of landscape character; and recognition of the hierarchy of biological and geological sites. Consider whether the latter section could be expanded to explain how the biodiversity/geodiversity of these areas will be protected.		Support welcomed. The suggestion that there could be further explanation provided regarding how the biodiversity and geology of identified areas could be protected is noted. However, such guidance is considered to be more appropriate within the Development Management DPD and/or picked up through the new single Local Plan. Appropriate requirements and explanation is provided through relevant 'saved' policies of the Dacorum Borough Local Plan 1991-2011. A minor change is required to the Policies Map with regard to the Wildlife Sites to ensure that the two additional sites identified for designation by the Local Wildlife Sites Ratification Panel, based on survey data gathered by the Local Sites Partnership in 2014, are included. These sites are: <ol style="list-style-type: none"> Westbrook Hay Golf Course, Bourne End Golf Course (61.01ha). Former Halsey School Playing Field (10.61ha). 	MC69
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	
<i>Individuals who agreed made the following comments:</i>			
-		N/A	
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
N/A		N/A	
<i>Landowners who agreed made the following comments:</i>			
N/A		N/A	

ISSUE: Chapter 9 – Conserving the Historic Environment			
Number of people/organisations responding 6			
Supporting -			
Key organisations	3		
Individuals	0		
Landowners	0		
Total	3		
Objecting -			
Key organisations	1		
Individuals	1		
Landowners	1		
Total	3		

Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed raised the following issues:</i>			
Whether the removal of the Green Belt from site GB/10 will adversely affect the setting of the Grade II registered Park of Tring Park (a heritage park and garden and designated heritage asset). If so, this would create a conflict with the NPPF paragraphs 169 and 170, chapters 12 and 9 as well as the PPG on housing and economic land availability which indicates that designated heritage assets should be considered.		No change. See response in Chapter 2 (Promoting Sustainable Development) relating to Green Belt objections.	No
Whether the removal of the Green Belt from site GB/9 (LA5) will adversely affect the setting of Tring Cemetery (designated as a Locally Registered Historic Park and Garden and on the Council's Local List). If so, this would create a conflict with the NPPF paragraphs 169 and 170, chapters 12 and 9 as well as the PPG on housing and economic land availability which indicates that designated heritage assets should be considered.		No change. See also response in Chapter 2 (Promoting Sustainable Development) relating to Green Belt objections.	No
<i>Organisations who agreed raised the following issues:</i>			
Whether there are 23 or 25 Conservation Areas in Dacorum		No change. Both Policy 120 of the Dacorum Borough Local Plan, the text in paragraph 9.8 of the Pre-Submission Site Allocations Written Statement, Appendix 5 of that document and paragraph 4.4 of the Looking After the Environment Background Issues Paper (September 2014) refer to their being 23 Conservation Areas within Dacorum. This figure is confirmed by the Council's Conservation team. The reference to 25 areas by English Heritage reflects the act that the Conservation Area in Kings Langley comprises 3 slightly separate areas. All existing designations are proposed for retention, with a slight boundary amendment to the Conservation Area boundary in Berkhamsted (see page 112 of Map Book).	No
Support by English Heritage for: <ul style="list-style-type: none"> Background Issues Paper on Looking After the Environment; The recognition and mapping of newly identified Scheduled Ancient Monuments and Areas of Archaeological Significance; The identification of locally designated Historic Parks and Gardens; The commitment to produce a list of locally listed buildings and other non-designated heritage assets. Offer advice on the content of any future Development Management policies pertaining to the how the historic environment can be managed, conserved and enhanced.		No change. Support welcomed. Appropriate Development Management policies are currently provided through relevant 'saved' policies of the Dacorum Borough Local Plan 1991-2011.	No
Whether 13 or 14 local historic parks and gardens are		Change required. The Pre-Submission Site Allocations Written Statement (paragraph 9.4) refers to the Council proposing	MC72

proposed for designation		14 areas as locally designated Historic Park and Gardens. These are listed in paragraph 4.35 of the Looking After the Environment Background Issues Paper (September 2014) and maps for each contained within the Map Book. However, the list in Appendix 5 of the Site Allocations document itself only list 13. This is an error and Gaddesden Park, Bridens Camp needs to be added to the list for completeness	
Individuals			
<i>Individuals who disagreed raised the following issues:</i>			
<p>Whether the gardens at Shendish should be a locally designated Historic Park and Garden in the light of:</p> <ul style="list-style-type: none"> • The area's future housing potential; • The late inclusion of the proposal • The lack of proper consideration having been given to the proposed designation (including by the Inspector); • The validity of the proposal due to perceived inaccuracies in the Garden Trust's assessment. 		<p>Change required. Residential development at Shendish has been proposed by the landowners and former Directors of Shendish Manor for many years. The site was considered as an alternative / additional residential site through the Core Strategy process, but not recommended or inclusion by the Inspector at that time. It is expected that the land will continue to be promoted through the early partial review of the Core Strategy; but the outcome of the review process cannot be pre-empted. The identification of part of the site as a locally designated Historic Park and Garden would not necessarily mean that development could not occur on the remainder of the site if this were to be supported by a future Local Plan designation. The area proposed for designation was however shown erroneously within the Map Book that accompanied the Pre-Submission Site Allocations written statement. This map illustrated the area of land previously proposed for residential development, rather than the much smaller area to the south of the site that is the site of the historic garden. This error will be corrected through a modification to the Site Allocations document. The area proposed for designation in the in the Looking After the Environment background Issues Paper (September 2014) also needs to be correct: although the text description of the area and historic maps and pictures contained within the assessment are correct. The current owners of Shendish Manor, who are working with the Hertfordshire Gardens Trust (HGT) to bring the gardens back to their former glory, have informally advised the Council that they are happy with the (corrected) area proposed for designation. The HGT have accepted it is sensible o focus the designation on key parts of the garden landscape around the house and dell, and omit the wider area of parkland surrounding – as much of this is now a golf course.</p> <p>The proposals relate to Shendish has not been a late introduction into the Site Allocations process. Councils have been encouraged to draw up list of locally listed buildings and other locally designated heritage assets for many years – and paragraph 169 of the National Planning policy Guidance (NPPG) now requires local planning authorities to have up-to-date evidence on the historic environment. The identification of locally designated Historic Parks and Gardens is an important part of this process.</p> <p>The HGT are recognised both by the Council and English Heritage to be local experts in such matters. Indeed the HGT have actually received direct funding for the project looking at potential local Historic Parks and Gardens Designations form English Heritage (EH), as part of a national project initiated by EH. As the Dacorum area was the first comprehensively surveyed by the HGT, they submitted their work to EH for approval and were consequently asked by EH to carry on similar work elsewhere within the county.</p> <p>HGT, together with Officers from Dacorum Borough Council's Conservation Team have been involved in discussion regarding the management of the listed buildings at Shendish Manor for many years. This has involved a number of direct discussions with the current owner of the hotel. The potential designation of Shendish as a locally designated Historic Park and Garden was identified in the 2006 Site Allocations consultation: where it received general support. Contrary to what the objector claims in their representations, it is not a new suggestion. The proposed designation will however be considered as part of the Site Allocations Examination process, where it will be given due consideration by an independent Planning Inspector before any designation can be formally confirmed. It is relevant to note that the current owner of Shendish Manor recently commissioned Professor Tom Williamson (Professor of Landscape History at the University of East Anglia) and Professor John Catt, a geologist from University College London, to carry out a detailed report on the site. This confirmed HGT's own assessment of its historic value.</p> <p>In terms of the methodology used by the HGT to assess potential sites, this reflects national guidance set by EH, although the requirements have been scaled down to reflect the fact that local rather than national level designation is being considered. This national guidance includes EH advice on local listing http://www.english-</p>	SC13

		heritage.org.uk/caring/listing/local/local-designations/ and http://www.english-heritage.org.uk/publications/good-practice-local-heritage-listing/ . EH also prepared a booklet which sets out the criteria for national Registration of Historic Parks and Gardens which they and all other bodies involved in locally listed parks and garden follow. There is also additional guidance on the EH website that has been referred to: http://www.english-heritage.org.uk/caring/listing/criteria-for-protection/pag-criteria/ . The Historic Landscape Project Officers (supported by EH and managed by the Gardens Trust) run courses on Local Registration which HGT members have attended. The HGT are therefore considered by the Council to be suitably qualified and to use a robust and appropriate methodology for assessing the merits of potential sites. The team who were assessing sites for Dacorum include individuals with masters degrees in Garden History and a former lecturer in Garden History. Their recommendations regarding the suitability of Shendish for designation is therefore accepted by the Council and supported by its own Conservation Officers. Indeed HGT continue to advise that Shendish is perhaps the most important of all the proposed local designations, with the fact that Edward Kemp was one of the foremost designers of his time elevating its importance to national level on certain assessment criteria.	
Landowners			
<i>Landowners who disagreed raised the following issues:</i>			
The robustness of the methodology used by the Hertfordshire Gardens Trust for assessing sites		Change required to the area proposed for designation. No further changes required. See response above.	No
The lack of consideration of the role that other designations, such as TPOs could paly in protecting the site appropriately		No change. The role of the local Historic Parks and Gardens designation is to recognise and highlight the importance of particular sites and locations within the Borough in terms of a combination of their landscape, historic and architectural merits. Other designations, such as Tree Preservation Orders, may also apply in these locations, but have a different role and function.	No
The appropriateness of Policies CS25: Landscape Character and CS27: Quality of the Historic Environment in terms of distinguishing between the significance of nationally and locally designated historic assets and the need for an additional policy to address these concerns.		No change. The Core Strategy Inspector supported these policies and they remain appropriate. They are currently supported by more detailed 'saved' policies form the Dacorum Borough Local Plan 1991-2011. These policies will be superseded by updated policies when the new single Local Plan for the Borough is adopted (schedule for 2017/18).This new policy / policies will provide an opportunity to provide any further clarification that is required. The Site Allocations DPD is not considered to be the appropriate document to provide such specific (Development Management style) advice. The Core Strategy already sufficiently explains that historic assets vary in terms of their significance and the mechanisms through which they are assessed and protected, with paragraph 17.3 clearly stating that <i>"All heritage assets are important and should be conserved. The weight given to the specific form of protection or conservation will vary according to the importance of that asset."</i> The preceding paragraph makes it clear that some designations are established nationally, whilst others are locally derived.	No
<i>Landowners who agreed raised the following issues:</i>			
N/A		N/A	
<i>Other comments from Landowners:</i>			
N/A		N/A	

ISSUE: Chapter 10-17 – Place Strategies	
Number of people/organisations responding	12
Supporting -	

Key organisations	7		
Individuals	1		
Landowners	0		
Total	8		
Objecting -			
Key organisations	0		
Individuals	1		
Landowners	3		
Total	4		
Note: A number of consequential changes are required to the maps and schedules in the Place Strategies as a result of changes highlighted in the main chapters of the plan.			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
Error noted on the Place Strategy Map for Berkhamsted where MU/6 is labelled with MU/7		Change required. Amend text on Place Strategy Map for Berkhamsted to correct error in numbering (i.e. MU/6 not MU/7).	E
<i>Organisations who agreed made the following comments:</i>			
Safeguarding zone around Heathrow Airport clarified for the location of wind turbine development		No change. Support and advice noted.	No
Support for the increased level of detail provided in the Site Allocations compared to the Core Strategy. Detail on OL/5 is provided in Chapter 7		No change. Support and advice noted.	No
Support from the County Council on paragraph 10.2 for development and infrastructure distribution		No change. Support and advice noted.	No
Support from the County Council for the public service quarter in Hemel Hempstead, and continued commitment to the provision of the library in the development		No change. Support and advice noted.	No
Support for acknowledged need for additional school facilities in the proposed development of East Hemel Hempstead area		No change. Support and advice noted.	No
Support for local objectives from Natural England and states that the Site Allocations should acknowledge that all sites are in the setting of the Chilterns AONB.		No change. Support and advice noted. Proximity to the AONB is noted in planning requirements for sites as appropriate.	No
Support for local objectives on traffic and congestion from Berkhamsted Town Council		No change. Support and advice noted. Local objectives are taken directly from the adopted Core Strategy, but have been reiterated for the Site Allocations DPD.	No

Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Support for the approach of prioritising brownfield land and previously developed land for housing (including H/18, H/19 and H/20) before Green Belt sites such as GB9 and GB10		No change. It is agreed that brownfield land and land within the existing urban area should be developed before allowing changes to the Green Belt: this approach is established through the adopted Core Strategy (Policy CS2: Selection of Development sites). The Core Strategy established the rationale for the Council's approach and the principle of developing Local Allocations such as LA5 in Tring (whose release from the Green Belt is denoted by proposal GB/9). GB/10 is a minor Green Belt boundary adjustment to improve the defensibility of the Green Belt boundary in London Road, Tring, through correcting an anomaly.	No
<i>Individuals who agreed made the following comments:</i>			
Supported for development in Bovingdon which meets the need for affordable housing, but concern raised regarding the lack of provision made specifically for elderly people, including bungalows.		No change. Support noted and welcomed. Proposed housing development would not exclude the provision of housing for the elderly. It is agreed that new development should be appropriate to the scale of surrounding development. This is supported by Policies CS10-12 of the adopted Core Strategy. Policy CS18 of the Core Strategy requires an appropriate mix of types of new housing to reflect local needs. This could include provision for elderly persons.	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
Objection to the limited extent of H/20 Depot Land, Langdon Street, Tring, which should cover more of the existing General Employment Area (GEA)		No change. See relevant section for comments – Chapter 4 on Employment Areas and Chapter 6 on Homes.	No
Objection to the consideration of Bovingdon as a Large Village. Inadequate justification for the rejection of other sites over LA6. There is no explanation on how the shortfall between lack of allocated sites and housing requirement. Consider the Homefield site to be more suitable than LA6.		No change. Both the settlement hierarchy and the designation of Local Allocation 6 in Bovingdon were established through the Core Strategy. Alternative site options within the Green Belt on the edge of the village were considered as part of the Core Strategy process (including through discussion at the Examination in public). The inclusion of LA6 was supported by the Core Strategy Inspector. The potential need for and suitability of further Green Belt housing sites in Bovingdon will be considered as part of the early partial review of the Core Strategy (and development of a new single Local Plan). The Site Allocations document clearly demonstrates how the Core Strategy housing target will be met and there is no shortfall between the lack of allocated sites and the housing requirement. See also response to Chapter 6: Housing.	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

ISSUE: Chapter 18 – Monitoring and Review			
Number of people/organisations responding 3			
Supporting -			
Key organisations	2		
Individuals	0		

Landowners	0		
Total	2		
Objecting -			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
Thames Water - Concerns regarding adequacy of the evidence base regarding the water environment. The Water Cycle Study completed in 2010 identifies the need for extensive upgrades of sewerage infrastructure to address the network capacity, receiving waste water treatment works (WwTW), sewer flooding and the water environment; all of which act as major constraints to development in Hemel Hempstead and Kings Langley in particular.	S	<p>Change required. Whilst there are known to be longer-term capacity issues with the existing Waste Water Treatment Works at Maple Lodge, the most recent update to the Infrastructure Delivery Plan (June 2015) identifies that existing and committed infrastructure provisions identified to date remain appropriate for the proposed level of growth set out within the Core Strategy. This was agreed with Thames Water. However, it was also acknowledged by Thames Water that more detailed modelling work for the Water Cycle Study is required to inform their next Asset Management Plan (AMP) period for 2020-2025 and to inform residential development within the affected local authorities up to 2031. This will be addressed through the Infrastructure Delivery Plan Update for 2016</p> <p>Within their representation, Thames Water has identified proposed site allocations which will require the developer to complete an appropriate assessment (i.e. a drainage strategy) in preparation of any planning application to deliver these sites. In light of this, the Council have highlighted the need for developers to liaise with Thames Water (and any other relevant water company) at an early stage of the planning process. Where the Council has prepared Master Plans (i.e. for the Local Allocations) the planning requirements will be modified to identify the need for early liaison with infrastructure providers (MC19, MC22, MC26, MC29, MC35 & MC38). Alternatively, where no master plan exists, developers will be advised to seek such engagement at the pre-application stage.</p> <p>In addition to the six Local Allocations, particular sites identified by Thames Water are:</p> <p><u>Housing Allocations:</u></p> <ul style="list-style-type: none"> • H/2 National Grid, 339-353 London Road, Hemel Hempstead; • H/3 Westwick Farm, Pancake Lane, Hemel Hempstead; • H/4 Ebberns Road, Hemel Hempstead; • H/5 Hewden Hire Site, Two Waters Road, Hemel Hempstead; • H/6 39-41 Marlowes, Hemel Hempstead; (<i>Note: now proposed for deletion</i>) • H/8 Turners Hill, Hemel Hempstead; • H/9 233 London Road, Apsley, Hemel Hempstead; • H/10 Apsley Paper Trail, Apsley, Hemel Hempstead; • H/11 The Point, Two Waters Road, Hemel Hempstead; • H/12 St Margarets Way/Datchworth Turn, Hemel Hempstead; • H/14 Frogmore Road, Hemel Hempstead; • H/17 Corner of High Street/Swing Gate Lane, Berkhamsted. <p><u>Mixed Use Allocations:</u></p>	MC3 MC4 MC6 MC7 MC9 MC19 MC22 MC26 MC29 MC35 MC38 MC43 MC44 MC45 MC46 MC49 MC51 MC52 MC53 MC54 MC55 MC58

		<ul style="list-style-type: none"> • MU/1 West Herts College site, Hemel Hempstead; • MU/2 Hemel Hempstead Hospital; • MU/3 Paradise/Wood Lane, Hemel Hempstead; • MU/4 Hemel Hempstead Station Gateway; • MU/6 Durrants Lane/Shootersway, Berkhamsted. <p>A short Advice Note entitled 'Planning Requirements for Waste Water Infrastructure Issues in Dacorum' has been prepared and placed on the Council's website. This advises developers of the requirement for the above sites, sets out what a Drainage Strategy should cover and provides contact details should further advice be required from Thames Water.</p> <p>Where necessary the Council will impose Grampian Conditions to ensure sewerage and waste water issues are appropriately addressed prior to occupation of the aforementioned developments.</p> <p>In order to address the issue of water supply and waste water infrastructure capacity on a holistic basis across water catchment areas, the Council are engaging with, and assisting, Hertfordshire County Council to complete a comprehensive county-wide study of the water environment which seeks to identify areas of development constraint with regard to potable water supply and waste water network and treatment capacity with the aim of identifying infrastructure solutions to enable planned growth. This study will form the basis of forthcoming technical work for the Council with the conclusions of this work being available to support work on the early partial review of the Core Strategy (i.e. formation of the new single Local Plan for the Borough).</p> <p>Mindful of the objections raised by the Environment Agency in regard to the waste water infrastructure and the potential impact upon the environment, the Council will prepare a Statement of Common Ground in conjunction with Thames Water and the Environment Agency. This Statement of Common Ground will commit the Council to completing the above-mentioned technical work and to also confirm within appropriate planning requirements that developers seek early liaison with Thames Water to ensure development proposed within the Site Allocations DPD is deliverable without detriment to the environment.</p>	
<i>Organisations who agreed made the following comments:</i>			
Hertfordshire County Council supported the commitments to: <ul style="list-style-type: none"> • coordinate delivery of new infrastructure with development; and • to ensure that all development, identified or otherwise (i.e. windfall), accords with Core Strategy Policy CS35. 		No change. Support noted and welcomed.	No
Natural England noted: <ul style="list-style-type: none"> • Support for coordinated delivery of infrastructure, indicators and the targets proposed – these indicators should be used for policies and proposals for the natural environment (SSSI, Chiltern Beechwood SAC and the Chilterns AONB). • Noted that all new windfall sites should accord with Core Strategy and Site Allocations DPD with particular reference to green infrastructure. 		No change. Support and comments noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			

-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No
<i>Other comments from Landowners:</i>			
-		N/A	No

ISSUE: Appendices			
<div>Number of people/organisations responding2</div> <div>Supporting -<div><div>Key organisations0</div><div>Individuals0</div><div>Landowners0</div><div>Total0</div></div><div>Objecting -<div><div>Key organisations1</div><div>Individuals1</div><div>Landowners0</div><div>Total2</div></div></div></div>			
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			
Concerns regarding the information contained within the housing trajectory graph in Appendix 2 relating to: <ul style="list-style-type: none">• Deliverability – supporting evidence does not demonstrate that the Council has a deliverable supply of housing.• Existing commitments and some identified sites are not deliverable.• Shortfall of housing supply in the first 8 years of the plan period – a 20% buffer should therefore be applied to the 5-year land supply.		No change. Issues raised relate more specifically to Chapter 6 of the Site Allocations DPD – see Chapter 6 responses.	No

• Further allocations required.			
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Concerns over accuracy of graph in Appendix 2 showing housing trajectory and what the colours denote.		No change. The updated housing trajectory graph in Appendix 2 is correct and a key is included. The key identifies that the orange line denotes the annualised housing target as derived from the Core Strategy (i.e. 430 homes per annum); and the green/turquoise line identifies the annual requirements for housing taking into account past and projected completions at April 2014.	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No
<i>Other comments from Landowners:</i>			
-		N/A	No

Table 4: List of Proposed Amendments to the Site Allocations Pre-Submission

Notes

1. Nature of the Amendment

MC	Minor Change	Changes of a minor nature that are required to reflect amendments referred to in Table 3, or as a consequential change from changes referred to in Table 3. Some minor changes follow minor changes arising from the representations.
E	Editorial Change	Editorial changes are intended to clarify meaning, update facts and correct any inaccuracies. All editorial changes are minor changes in nature. Some editorial changes follow minor changes arising from the representations.
SC	Significant change	Changes of a more significant nature that are required to reflect amendments referred to in Table 3, or as a consequential change from changes referred to in Table 3. Significant changes usually relate to the inclusion of a new proposal site or a more substantial change to the wording or boundary of a designation or proposal.
2. All Significant Changes (SC) and Minor Changes (MC) are numbered sequentially as they appear in the Table below. Editorial changes are not numbered.
3. Some changes in Table 2 may result in more than one Significant Change (SC) or Minor Change (MC) due to changes being made to the text and / or maps in more than one location.
4. All Significant Changes (SC) and Minor Changes (MC) are referenced in the main part of Table 2, with any resulting changes to the Policies Map or maps and diagrams within the Written Statement listed below. Editorial changes to the Written Statement are referenced either in the main part of the Table or in the list of map changes that follows.
5. Further changes will be necessary as a consequence of some of the amendments listed: e.g. the renumbering of the Schedules of Proposals and Sites as a result of deletions and /or additions, and the renumbering of paragraphs in sections where text has been added or deleted.
6. Deleted text is shown via ~~strikethrough~~, whilst new text is underlined.

1. TEXT AMENDMENTS:

Site Allocations Reference / Section	Amendment Reference	Amendment Required
Throughout document	E	Update titles of organisations as necessary e.g. Highways Agency to Highways England and English Heritage to Historic England.
Forward	E	Delete section.
PART A		
1. Introduction		
Text: 1.1-1.22	MC1	<p>1.3 In addition to the Site Allocations, the following Development Plan Documents (DPDs) will <u>were originally proposed to</u> help to achieve the vision and objectives set out within the Core Strategy:</p> <ul style="list-style-type: none"> Development Management Policies – supports the Core Strategy by setting out additional, more detailed planning policies that the Council will use when considering planning applications. East Hemel Hempstead Area Action Plan (AAP) – provides a detailed planning framework for the eastern part of Hemel Hempstead, whose regeneration is of particular importance to the wellbeing and prosperity of the Borough and beyond. The extent of this AAP within Dacorum is shown in Figure 22 of the Core Strategy and on Map 1. The extent of the AAP within St. Albans is to be confirmed. The AAP will contain planning policies and associated designations for the east Hemel Hempstead area.

Site Allocations Reference / Section	Amendment Reference	Amendment Required
	MC2	Add new paragraph after paragraph 1.3 and renumber subsequent paragraphs sequentially <u>Work on the Development Management DPD is now on hold and appropriate policies will instead be included within the new single Local Plan for the Borough. This new plan will also incorporate the early partial review of the Core Strategy, with a particular focus on assessing household projections, the role and function of the Green Belt affecting Dacorum and the role that effective co-operation with local planning authorities could play in meeting housing needs arising within the Borough. Progress on the Area Action Plan remains dependent upon the content and scope of St Albans' emerging Local Plan.</u>
Figure 1		No change
Map 1		No change
Figure 2	E	Update diagram to show the plan has moved from 'Publication of and representation on Pre-Submission' to the 'Submission Stage' and update dates for Submission, Examination and Adoption to reflect amended timetable. (see amended diagram below).
Summary of Content		No change
Map 2	E	Amend title of Map to refer to 'Core Strategy Extract – Key Diagram'
PART B		
THE SUSTAINABLE DEVELOPMENT STRATEGY		
Strategic Objectives		No change
2. Promoting Sustainable Development		
Text: 2.1-2.3	E	Paragraph 2.1: Amend as follows: 2.1 The Core Strategy establishes the approach to the broad scale and distribution of development within the Borough and sets out the main role and function of different areas through the settlement hierarchy (Table 1 in the Core Strategy). The role of the Site Allocations DPD is to add detail to this strategy, through the setting of specific boundaries and proposals, and ensuring that sufficient land is made available at the right time and in the right location. <u>It is the role of the early partial review process (see paragraphs 29.7-29.10 of the Core Strategy) to look again at longer term needs and to take account of a whole range of Government policies and guidance, including those relating to housing and the Green Belt.</u>
Policy SA1		No change
Text: 2.4-2.11	E	Paragraph 2.8: Amend as follows: 2.8 Major Developed Sites (MDS) are identified in Table 2 of the Core Strategy. This designation recognises the contribution that large and well-established developments in the Green Belt can make to meeting local education, housing and employment needs. All of the defined sites are self-contained and benefit from relatively compact layouts. Any future development should be limited and opportunities taken to improve the relationship of non-conforming uses with the adjoining countryside and limit the sites' impact on the openness of the Green Belt, <u>and upon any other designations that may apply to a site.</u>
	E	Paragraph 2.9: Amend as follows: 2.9 Existing site boundaries have been reassessed and new sites considered for inclusion in line with the selection criteria in paragraph 8.31 of the Core Strategy. Minor changes have been made to the infill areas of the majority of sites, to reflect recent permissions and proposals. Outer boundaries for all sites (including the new MDSs at the British Film Institute in Berkhamsted <u>and Abbott's Hill School, Hemel Hempstead</u>) are defined on the Policies Map, with both outer and infill boundaries shown in greater detail in Appendix 3.
	E	Paragraph 2.10: Amend as follows: 2.10: Kings Langley School site is currently subject to planning proposals relating to its comprehensive redevelopment. To enable the school to continue to operate, this will involve the construction of new school facilities on land adjacent to the current buildings in the southern part of the site. An appropriate infill boundary will be defined once this redevelopment is complete. In the interim, planning applications will be considered in the

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		<p>context of Policy CS5: Green Belt and the planning requirements set out in the Schedule of Major Developed Sites.</p> <p><u>Kings Langley School has recently received planning permission for a comprehensive redevelopment of its site and facilities. A new infill area has been defined based on the broad location of the new school buildings on the plans accompanying the planning application, whilst allowing for a degree of flexibility for future development.</u></p>
	E	<p>Paragraph 2.11: Amend as follows to reflect changes made to MDS boundary outlined in schedule below:</p> <p>2.11 The Major Developed Sites at Bourne End Mills and Bovingdon Brickworks are also designated as Employment Areas in the Green Belt (see Policy SA6). The outer boundaries for both designations are contiguous.</p>
Policy SA2		No change
Policies Map showing changes to Green Belt boundaries	SC1	Amend Map GB/9 – LA5 West Tring to show enlarged area for removal from the Green Belt to cover cemetery extension and Gypsy and Traveller site. (See Map below).
Schedule of Major Developed Sites	SC2	<p>New proposal to be inserted in the schedule, with site added to Policies Map and infill area shown in Appendix 3 (see map below).</p> <p><u>Hemel Hempstead</u> <u>Site MDS/1</u> <u>Location: Abbot's Hill School</u> <u>Planning Requirements: Any future development should respect the site's designation as a Locally Registered Park or Garden of Historic Interest, and meet the requirements of Policy CS27: Quality of the Historic Environment. Development to be concentrated in the infill area and to respect the character of the school's main building which dates back to 1836.</u></p>
	E	Due to the insertion of a new MDS at the start of the schedule the numbers of subsequent MDS will increase by 1, e.g.: Site MDS/4 changes to <u>Site MDS/2</u>
	SC3	<p>Amend schedule as follows and show infill area in Appendix 3 (see below):</p> <p>Kings Langley MDS/6 <u>MDS/7</u> Location: Kings Langley School, Love Lane Planning Requirements: Infill area to be defined following completion of the school redevelopment. Development should be focussed in the southern part of the site, broadly reflecting the extent of the existing buildings. The remaining part of the site should remain in open playing field use. Development to be located within the infill area. Outside of the infill area appropriate open uses are acceptable such as playing pitches (hard or soft surfaced) and car parking.</p>
	SC4	<p>Amend schedule as follows and show revised boundaries in Appendix 3 and the Map Book (see below):</p> <p>MDS/7 <u>MDS/8</u> Location: Bourne End Mills Employment Area, Bourne End Planning Requirements: Environmental improvements required. External boundary treated as <u>New development should be focussed within the infill area subject to the its intensity of any future development being appropriate for the Green Belt location. Environmental improvements required throughout the site, including the former</u> Former <u>area of open storage to the south west (excluded from the infill area) which is</u> MDS <u>and to remain open. Also see requirements relating to Policy SA6: Employment Areas in the Green Belt.</u></p>
Text: 2.12-2.13	E	<p>Paragraph 2.12: Amend as follows:</p> <p>2.12 There are a number of instances, particularly with larger sites, where an allocation will be delivered as part of a mix of other activities, <u>often</u> including housing, commercial, social, community and/or leisure uses. This approach is supported by national guidance, with the NPPF requiring planning to '<i>promote mixed use development, and encourage multiple benefits from the use of land</i>' (paragraph 17).</p>

Site Allocations Reference / Section	Amendment Reference	Amendment Required
Schedule of Mixed Use Proposals and Sites	MC3	Amend Planning Requirements for Proposal MU/1 West Herts College site and Civic Centre as follows: Development to be guided by Town Centre Master Plan (Gade Zone) and associated Gade Zone Planning Statement. Proposal to be planned comprehensively to secure a range of uses including a new Public Service Quarter and replacement college campus. Mix of uses to include educational, leisure and commercial uses including retail uses (possibly including a food store). High density housing is acceptable. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC4	Amend Planning Requirements for Proposal MU/2 Hemel Hempstead Hospital Site as follows: Development to be guided by Town Centre Master Plan (Hospital Zone). Development brief required. Key uses to include a reconfigured local hospital facilities and the provision of a new primary school. Housing to be delivered as part of a comprehensive development. Development to be coordinated with H/7. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC5	Additional land to be added to MU/2 Hemel Hempstead Hospital as a consequence of an amendment to the boundary to Proposal H/8 (see map below). See also related changes to Proposal H/8.
	MC6	Amend Planning Requirements for Proposal MU/3 Paradise / Wood Lane as follows: Development to be guided by Town Centre Master Plan (Hospital Zone). Potential for redevelopment for smaller units in B1 use. High density flats or housing acceptable. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC7	Amend Planning Requirements for Proposal MU/4 Hemel Hempstead Station Gateway as follows: Development brief required to take forward existing Hemel Hempstead Station Gateway feasibility study. Comprehensive redevelopment of site sought, to promote the station as a key transport gateway and to deliver improvements to the station forecourt. Uses to include housing, multi-storey car park and other commercial uses that complement the operation of the railway station. The layout, scale, height and density of the development must respect the adjoining residential area and semi-rural character of Boxmoor. <u>It should not lead to any adverse effects on the nearby Roughdown Common SSSI.</u> Development must deliver improvements to the immediate and wider vehicular and pedestrian circulation across the site and to and from the railway station and station forecourt. Existing mature trees should be retained where possible. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC8	Amend Planning Requirements for Proposal MU/5 Bunkers Park, Bunkers Lane as follows: Master plan required to co-ordinate uses across the site. Potential to accommodate the relocation of existing local tennis facilities to allow housing allocation H/7 to proceed, subject to further technical work to assess whether an exception to normal policy can be fully justified in the light of Bunker's Park location in the Green Belt, the facility's current siting in Open Land, and that there are no other suitable alternative sites available within the settlement boundary. Leisure space to include public and private sport pitches. <u>The new tennis facilities should be of at least equivalent quantity and quality, located in a suitable location, and should be substantially progressed before any housing scheme has commenced on H/6 in order to ensure its delivery. It is anticipated that joint applications will be made to co-ordinate Proposals H/6 and MU/5.</u> Any buildings and car parking to be separated from adjacent residential properties by an effective landscape screen and well screened from adjacent open areas. Existing trees and hedgerows to be retained and enhanced, and further planting carried out as appropriate.
	MC9	Amend Planning Requirements for Proposal MU/6 Land at Durrants Lane / Shootersway as follows: Development to be guided by requirements as set out under Proposal SS1 in the Core Strategy and associated master plan. Proposal linked to leisure

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		proposal L/2 which will deliver formal and informal playing fields. Comprehensive development scheme is required to deliver a mix of residential, educational and leisure uses. Planning application for 92 homes submitted in 2013/14 approved in 2014/15 on southern part of site. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC10	New proposal to be inserted in the schedule following changes to Proposal H/15 (see below) and amended reference shown on Policies Map (see map below). <u>Proposal MU/8</u> <u>Location: Former Police Station and library site, r/o High Street / Kings Road, Berkhamsted</u> <u>Site Area (Ha): 0.23</u> <u>Proposal: Housing (up to 23 homes) and replacement library</u> <u>Planning Requirements: High quality scheme required given its prominent location in the town centre and Conservation Area. Given this prominent location, care needs to be taken over of the height and corner treatment of buildings. High density housing acceptable. Can be delivered as part of a mix of other town centre uses, including a replacement library. Explore potential to link to Proposal MU/9 through adjoining land. Application approved in 2014/15 for 23 homes and a new library subject to the completion of a legal agreement.</u>
	MC11	New proposal to be inserted in the schedule following changes to Proposal H/16 (see below) and amended reference shown on Policies Map (see map below). <u>Proposal MU/9</u> <u>Location: Berkhamsted Civic Centre and land to r/o High Street, Berkhamsted</u> <u>Site Area (Ha): 0.4</u> <u>Proposal: Housing (up to 16 homes) and replacement civic centre</u> <u>Planning Requirements: High quality scheme required given prominent location in town centre and Conservation Area. Capacity to be tested and confirmed through detailed planning. Retain existing building façade on to High Street. Potential for a mix of town centre uses acceptable, including social and community uses. Predominantly two storey development with taller buildings to High Street frontage acceptable. Access from Clarence Road. Explore potential to link to proposal MU/8 through adjoining land.</u>
3. Enabling Convenient Access between Homes, Jobs and Facilities		
Text: 3.1-3.9	E	Amend footnote 3 as follows: Appendix 1 of the Infrastructure Delivery Plan January 2014-June 2015.
	MC12	Add new paragraph before paragraph 3.9 and renumber all subsequent paragraphs sequentially: <u>The Government is considering extending the current Crossrail project into Hertfordshire to stations including Hemel Hempstead, Berkhamsted and Tring. Should this scheme go ahead, it is expected to lead to reduced journey times and extended services into London without the need to change at Euston. The project could result in significant new investment in the railway stations, particularly at Tring station.</u>
Policy SA3	MC13	POLICY SA3: Improving Transport Infrastructure: Amend first sentence as follows: The main transport proposals <u>in the plan area</u> for allocation and safeguarding are identified in the Schedule of Transport Proposals and Sites.
Text: 3.10		No change
Policy SA4		No change
Schedule of Transport Proposals and Sites	MC14	Schedule of Transport Proposals and Sites: Amend notes section as follows:

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		<i>Note: Proposals are referred to as being either short term (to 2021) or long term (2021-2031). However, where opportunities arise, schemes could be brought forward earlier where appropriate and if financial and technical resources allow.</i>
	MC15	Proposal T/19 Lower Kings Road public car park - Planning Requirements Provide increased capacity through decking. <u>The Council is undertaking feasibility work to explore the proposal's funding and delivery. Subject to its outcome, this could result in earlier implementation of the scheme.</u>
STRENGTHENING ECONOMIC PROSPERITY		
Strategic Objectives		No change
4. Providing for Offices, Industry, Storage and Distribution		
Text: 4.1-4.11		No change
Policy SA5		No change
Text: 4.12-4.13		No change
Policy SA6	SC5	Amend boundary of Bourne End Mills Employment Area in the Green Belt to include south west part of site (see map below).
Schedule of Employment Proposals and Sites		No change
Policies Map	E	Amend boundary of GEA: Apsley Mills, Hemel Hempstead to correct current overlap with Housing proposal Site H/9 (see map below).
5. Supporting Retailing and Commerce		
Text: 5.1-5.10	E	Paragraph 5.10: Amend as follows: 5.10 Potential Changes to permitted development (PD) rights may allow for the change of use from a small shop or professional/financial service to residential use, subject to a local impact test. This test includes consideration of whether the shop is in a key shopping area. Within the key shopping areas, it is important to retain active frontages at the ground floor level; residential and office uses will therefore be resisted. Active frontages enhance the vitality and vibrancy of town centres; a proliferation of inactive frontages can result in 'dead' frontage, reduced pedestrian flows and lead to the gradual disappearance of shopping.
Policy SA7		No change
Text: 5.11-5.19		No change
Table 1		No change
Text: 5.20		No change
Schedule of Retail Proposals and Sites	SC6	Amend schedule as follows: Proposal S/1 Location: Jarman Fields, St Albans Road, Hemel Hempstead Site Area (Ha): 2.0 Planning Requirements: Proposed use is 6,700sq m (gross) of non-food retail warehousing as per planning permissions 04/00455/07/MFA and 04/00377/10/VOT. Acceptable uses are retail and leisure uses. Approximately 7,000 sqm (gross) of retail floorspace is acceptable, except for the sale and display of clothing and footwear, unless ancillary to the main use of an individual unit. Prominent frontages onto St Albans Road/Jarman Way require high quality of design and landscaping. A traffic study may be required and road works should accommodate traffic generation.
PROVIDING HOME AND COMMUNITY SERVICES		
Strategic Objectives		No change
6. Providing Homes		
Text: 6.1-6.12	E	Paragraph 6.4: Amend text as follows:

Site Allocations Reference / Section	Amendment Reference	Amendment Required																						
		<p>6.4 A range of sources have been used to identify potential housing sites:</p> <ul style="list-style-type: none">unimplemented proposal sites and conversion of employment land to housing in the Dacorum Borough Local Plan 1991-2011;land subject to more detailed supplementary planning guidance and development briefs;sites put forward through consultation on the Issues and Options stage (in 2006 and 2008);sites put forward after 2008 and through a final “call for sites” in early 2014 <u>and early 2015</u>;information on the Council’s own New Build Programme;existing Strategic Housing Land Availability Assessment (SHLAA) sites; andnew housing sites identified in the housing programme in the Annual Monitoring Report (AMR).																						
Table 2		No change																						
Text: 6.13-6.16	E	<p>Paragraph 6.13: Amend text as follows:</p> <p>6.13 A neighbourhood plan is being progressed in the Grovehill neighbourhood of Hemel Hempstead. The plan is at <u>a draft</u> an early stage and includes the potential for redevelopment of the Grovehill local centre that could deliver additional housing land (c. 200 homes). However, whilst accepted in principle, the work is not at a sufficiently advanced stage to justify a specific allocation.</p>																						
	E	<p>Paragraph 6.15: Amend text as follows to reflect most up-to-date monitoring position:</p> <p>6.15 Over the period 2006-2014<u>5</u> 2,993 <u>*****</u> homes (net) had been completed. As at 1st April 2014<u>5</u>, there were commitments (i.e. planning permission and applications awaiting the completion of legal agreements) for <u>2,468</u> **** homes. The Residential Land Position Statement and Annual Monitoring Report provide information on all committed sites¹. The Site Allocations document sets out how the housing allocations will contribute towards meeting the remaining requirement of <u>5,584</u> **** homes.</p> <p><i>(Note: revised numbers to be added when Housing Land Position Statement has been finalised)</i></p>																						
	E	<p>Paragraph 6.15: Amend footnote 18 as follows:</p> <p>DBC Delivering Success: Annual Monitoring Report & Progress on the Dacorum Development Programme <u>2013/14</u> 2012/13 <u>and as updated by the</u> Residential Land Commitments Position Statement No. 44 <u>42</u> (1st April 2014<u>2015</u>).</p>																						
Table 3	E	<p>Table 3: Housing Programme 2006-2031: Update figures to reflect most up-to-date monitoring position and amendment proposed to Schedule of Housing Proposals and Sites:</p> <table><tr><th>Source</th><th>No. of homes (net)*</th></tr><tr><td>Completions 2006-2014 <u>15</u></td><td><u>2,998</u> *****</td></tr><tr><td>Commitments as at 1st April-2014 <u>2015</u></td><td><u>2,468</u> *****</td></tr><tr><td>Housing schedule (comprising new allocations, Mixed Use Allocations and Local Allocations)</td><td><u>3,685</u> 3,656</td></tr><tr><td>SHLAA sites</td><td>645</td></tr><tr><td>Other (non SHLAA) sites</td><td>149</td></tr><tr><td>Defined locations in Hemel Hempstead</td><td>675</td></tr><tr><td>Windfall in Residential Areas of the main settlements</td><td>550</td></tr><tr><td>Rural housing sites</td><td>105</td></tr><tr><td>Gypsy and Traveller pitches</td><td>17</td></tr><tr><td>Total</td><td><u>10,992</u> *****</td></tr></table>	Source	No. of homes (net)*	Completions 2006-2014 <u>15</u>	<u>2,998</u> *****	Commitments as at 1 st April-2014 <u>2015</u>	<u>2,468</u> *****	Housing schedule (comprising new allocations, Mixed Use Allocations and Local Allocations)	<u>3,685</u> 3,656	SHLAA sites	645	Other (non SHLAA) sites	149	Defined locations in Hemel Hempstead	675	Windfall in Residential Areas of the main settlements	550	Rural housing sites	105	Gypsy and Traveller pitches	17	Total	<u>10,992</u> *****
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Site Allocations Reference / Section	Amendment Reference	Amendment Required
		<p><i>* as at 1st April 2014 <u>2015</u>.</i></p> <p><i>(Note: revised numbers to be added when Housing Land Position Statement has been finalised)</i></p>
Text: 6.17-6.30	E	<p>Paragraph 6.18: Amend footnote 19 as follows:</p> <p>Site Allocations Issues Paper: Providing Homes and Community Services (September 2014 <u>June 2015</u>)</p>
	E	<p>Paragraph 6.21: Amend text as follows to reflect changes to the Schedule of Housing Proposals and Sites:</p> <p>6.21 The housing schedule provides for an indicative capacity of 3,685 <u>3,656</u> dwellings.</p>
Policy SA8		No change
Policy LA1	MC16	<p>Amend section on Key Development Principles (bullet point 1) as follows:</p> <ul style="list-style-type: none"> Deliver a mix of two-storey and three-storey housing including 40% affordable homes.
	MC17	<p>Amend section on Key Development Principles (bullet point 4) as follows:</p> <ul style="list-style-type: none"> Limit buildings to two storeys, except where a higher element would create interest and focal points in the street scene <u>and is appropriate in terms of topography and visual impact</u>.
	MC18	<p>Amend section on Delivery and Phasing' (bullet point 2) as follows:</p> <ul style="list-style-type: none"> The site will be developed in phases in accordance with the master plan. <u>The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.</u>
	MC19	<p>Amend section on Delivery and Phasing (bullet point 6) as follows:</p> <ul style="list-style-type: none"> Early liaison required with Thames Water <u>to develop a Drainage Strategy to identify any infrastructure upgrades required in order</u> to ensure that sufficient sewerage and sewage treatment capacity is available to support <u>the timely</u> delivery of this site.
	MC20	<p>Amend section on Delivery and Phasing (bullet point 7) as follows:</p> <ul style="list-style-type: none"> Early liaison required with the SuDS Approval Body (SAB) <u>the local planning authority</u> to ensure appropriate sustainable drainage is planned for <u>designed into the development scheme</u> at the early design stage.
Policy LA2	MC21	<p>Amend section on Key Development Principles (bullet point 5) as follows:</p> <ul style="list-style-type: none"> Limit housing to two storeys, except where a higher element would create interest and focal points in the street scene, <u>and would not be harmful to the historic environment</u>.
	MC22	<p>Amend section on Delivery and Phasing (bullet point 6) as follows:</p> <ul style="list-style-type: none"> Early liaison required with Thames Water <u>to develop a drainage strategy to identify any infrastructure upgrades required in order</u> required to ensure <u>that</u> sufficient sewerage and sewage treatment capacity is available to support <u>the timely</u> delivery of this the site.
	MC23	Amend section on Delivery and Phasing (bullet point 7) as follows:

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		<ul style="list-style-type: none"> Early liaison required with the <u>local planning authority</u> SuDS Approval Body (SAB) to ensure appropriate sustainable drainage is <u>designed into the development scheme at the early design stage</u> planned for at the early design stage.
Policy LA3	MC24	<p>Amend section on Key Development Principles (new bullet point) as follows:</p> <p>(c) Design</p> <ul style="list-style-type: none"> Optimise the potential for views across the Bulbourne valley. Limit buildings to two storeys normally. Design the development to the highest sustainability standards possible. Take the character of buildings in the Chilterns area as a guide to high quality attractive design. Use traditional materials, such as red brick, clay tiles and timber boarding, where feasible. Arrange buildings and routes to achieve natural surveillance, good pedestrian access to facilities and an attractive relationship to open spaces. <u>Design, layout and landscaping to safeguard the archaeological and heritage assets within and adjoining the development.</u>
	MC25	<p>Amend section on Delivery and Phasing (bullet point 2) as follows:</p> <ul style="list-style-type: none"> The site will be developed in multiple phases in accordance with the master plan. <u>The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases).</u> This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.
	MC26	<p>Amend section on Delivery and Phasing (bullet point 6) as follows:</p> <ul style="list-style-type: none"> Early liaison with Thames Water required to ensure sufficient sewerage and sewage treatment capacity is available to support delivery of the site. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u> Early liaison required with the SuDS Approval Body (SAB) to ensure appropriate sustainable drainage is planned for at the early design stage. <u>Early liaison required with the local planning authority to ensure appropriate sustainable drainage is designed into the development scheme at an early stage.</u>
	MC27	<p>Proposal LA3 – Amend Policies Map to exclude hamlet of Pouchen End from the LA3 designation (see map below).</p> <p>Note: The eastern part of the hamlet of Pouchen End remains intentionally excluded from the Green Belt through new boundary change.</p>
Policy LA4	MC28	<p>Amend section on Delivery and Phasing (bullet point 2) as follows:</p> <ul style="list-style-type: none"> The site will be developed as a single phase in accordance with the master plan. <u>The Council's expectation is that the development will be progressed through a planning application covering the site as a whole. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.</u>
	MC29	<p>Amend section on Delivery and Phasing (bullet point 7) as follows :</p> <ul style="list-style-type: none"> Early liaison with Thames Water required to ensure sufficient sewerage and sewage treatment capacity is available to support delivery of the site. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC30	<p>Amend section on Delivery and Phasing (bullet point 7) as follows :</p> <ul style="list-style-type: none"> Early liaison required with the SuDS Approval Body (SAB) to ensure appropriate sustainable drainage is planned for at the early design stage. <u>Early liaison required with the local planning authority to ensure appropriate sustainable drainage is designed into the development scheme at an</u>

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		<u>early stage.</u>
Policy LA5	SC7	<p>Amend Policy text as follows:</p> <p>Local Allocation 5 at Icknield Way as identified on the Policies Map consists of a the eastern fields development area which has been released from the Green Belt and the western fields (within the Chilterns Area of Outstanding Natural Beauty) which will remain in the Green Belt. <u>All of LA5 has been released from the Green Belt, except for the western fields open space.</u> LA5 will deliver the following:</p> <ul style="list-style-type: none"> • 180-200 new homes in the <u>eastern fields</u> development area, • An extension within the eastern fields development area of around 0.75 hectares to the Icknield Way Industrial Estate for B-class uses • An extension to the cemetery of around 1.6 hectares, in the western fields, <u>and also except for</u> car parking and associated facilities <u>for the cemetery</u> which will be provided in the eastern fields development area. • A traveller site of 5 pitches <u>in the western fields</u> • Open space (around 6.5 <u>6.1</u> hectares) in the western fields <p>Amend Policies Map accordingly.</p>
	MC31	<p>Amend West of Tring Vision (sentence 2 in the final paragraph) as follows:</p> <p>The use and management of <u>most of</u> the western fields for open space will enhance the appearance and enjoyment of the Chilterns AONB.</p>
	MC32	<p>Amend section on Key Development Principles (bullet point 10) as follows:</p> <ul style="list-style-type: none"> • Locate the cemetery extension in the western fields, west of the new housing on Aylesbury Road, and provide good landscaping <u>and a significant area for natural burials.</u>
	MC33	<p>Amend section on Key Development Principles (bullet point 13) as follows:</p> <ul style="list-style-type: none"> • Provide a mix of parkland and informal open space in the western fields and consider the inclusion of pitches for outdoor sports <u>on part of this land.</u>
	SC8	Amend Indicative Spatial Layout to show a defined area for the Traveller site and other minor changes to improve clarity (see map below).
	MC34	<p>Amend section on Delivery and Phasing (bullet point 2) as follows:</p> <ul style="list-style-type: none"> • The site will be developed in phases in accordance with the master plan. <u>The Council's expectation is that the development will be progressed through a planning application covering the site as a whole. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.</u>
	MC35	<p>Amend section on Delivery and Phasing (bullet point 7) as follows:</p> <ul style="list-style-type: none"> • Early liaison required with Thames Water to develop a drainage strategy to identify any infrastructure upgrades required in order required to ensure <u>that</u> sufficient sewerage and sewage treatment capacity is available to support <u>the timely</u> delivery of <u>this the</u> site.
	MC36	<p>Amend section on Delivery and Phasing (bullet point 8) as follows:</p> <ul style="list-style-type: none"> • Early liaison required with the <u>local planning authority SuDS Approval Body (SAB)</u> to ensure appropriate sustainable drainage is <u>designed into the development scheme at an early stage</u> planned for at the early design stage.
Policy LA6	MC37	Amend section on Key Development Principles (bullet point 6) as follows:

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		<ul style="list-style-type: none"> Potential for limited new <u>vehicular</u> crossovers to allow some direct access to properties facing Chesham Road.
	MC38	<p>Amend section on Delivery and Phasing (bullet point 6) as follows:</p> <ul style="list-style-type: none"> Early liaison required with Thames Water <u>to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewage treatment capacity is available to support the timely delivery of the site.</u>
	MC39	<p>Amend section on Delivery and Phasing (bullet point 7) as follows:</p> <ul style="list-style-type: none"> Early liaison required with the SuDS Approval Body (SAB) <u>the local planning authority</u> to ensure appropriate sustainable drainage is planned for <u>designed into the development scheme</u> at the early design stage.
Text: 6.31-6.34		No change
Table 4		No change
Text: 6.35-6.41		No change
Policy SA9		No change
Schedule of Housing Proposals and Sites	E	Update text of Notes sections within schedule to refer to amended capacity figures and base date for information.
	MC40	Insert cross references to new Proposals MU/8 to replace current H/15.
	MC41	Insert cross references to new Proposals MU/9 to replace current H/16.
	MC42	<p>Amend Planning Requirements for Proposal H/1 Land r/o 186-202 Belswains Lane as follows:</p> <p>Development to be co-ordinated with adjoining land in Swan Mead / Repton Close. Access from Swan Mead / Repton Close. Buildings should not generally exceed two storeys. <u>Need to ensure that the impact of the development on any surviving protected species is taken into account.</u></p>
	MC43	<p>Amend Planning Requirements for Proposal H/2 National Grid and 339-353 London Road as follows:</p> <p>Comprehensive development is sought. Main access from London Road. Secondary access from Stratford Way to serve rear of site is acceptable dependent upon number of units proposed and impact on existing trees. Existing footpath to be retained and enhanced. The site should be decontaminated and restored. Mixed scheme of houses and flats sought, respecting the adjoining commercial area, residential area and semi-rural character of Boxmoor. The retention of trees is encouraged. The development should be designed to safeguard the amenities of adjoining residents. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u></p>
	MC44	<p>Amend Planning Requirements for Proposal H/3 Land at Westwick Farm, Pancake Lane as follows:</p> <p>Development to be guided by existing development brief for the site. Application granted in 2013/14 for 26 homes for southern half of the site with alternative access arrangements from Westwick Row. Mixed two storey housing development. Density, layout and landscaping to provide for soft edges to settlement. Hedgerows to be retained as far as possible and supplemented. An open setting should be maintained surrounding the retained farm buildings and a substantial landscaped buffer is required along Westwick Row. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u></p>
	MC45	<p>Amend Planning Requirements for Proposal H/4 Ebberns Road as follows:</p> <p>Development to be guided by existing development brief for site. Redevelopment for two storey housing or flats fronting Ebberns Road. Three storey building may be possible, subject to detailed design consideration. Flats with communal gardens are preferred around the locks. Building design and layout must respect the canal frontage: substantial planting and cycleway alongside the canal towpath. Cycleway and footpath link to canal bridge 153 to Ebberns</p>

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		Road. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC46	Amend Planning Requirements for Proposal H/5 Former Hewden Hire site, Two Waters Road as follows: Access from Two Waters Road. The development should be designed and landscaped to safeguard the open land setting of the site. Flats with communal gardens are preferred. Flood risk assessment required. <u>There is potential for the capacity to be exceeded if fully justified against these constraints, and subject to viability considerations and achieving a high quality design that protects the character and setting of the site.</u> <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC47	Delete Proposal H/6 39-41 Marlowes to reflect its re-use for social and community purposes rather than residential, update the Policies Map accordingly and renumber remaining proposals sequentially: Proposal H/6 Location: 39-41 Marlowes Net Capacity: 40 Planning Requirements: Development to be guided by Town Centre Master Plan (Original Marlowes Zone).
	MC48	Amend Planning Requirements for Proposal H/7 Leverstock Green Tennis Club, Grasmere Close as follows: Housing development can only proceed if an alternative tennis facility is viable, and feasible and can be secured under Proposal MU/5 in the absence of the availability of other sites. <u>The new facilities should be of at least equivalent quantity and quality, located in a suitable location and should be substantially progressed before any housing scheme has commenced in order to ensure its ultimate delivery. It is anticipated that joint applications will be made to co-ordinate Proposals H/6 and MU/5.</u> Capacity to be tested and confirmed through detailed planning. The development should be designed and landscaped to safeguard the open land setting of the site and the amenities of nearby residents. Access from Grasmere Close.
	MC49	Amend Planning Requirements for Proposal H/8 Land at Turners Hill as follows: To be planned comprehensively with Proposal MU/2. Access from A414, although some housing may be required to be served from Turners Hill. Public footpaths to be retained and new link created between Turners Hill and Albion Hill. Hedgerows and trees to be retained and supplemented. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC50	Amend boundary of Proposal H/8 Land at Turners Hill to exclude eastern portion of site and show revised area on Policies Map (see map below). The excluded area is now to be included within the boundary to MU/2. This will result in a consequential amendment to MU/2 (see maps below)
	MC51	Amend Planning Requirements for Proposal H/9 233 London Road, Apsley as follows: <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC52	Amend Planning Requirements for Proposal H/10 Apsley Paper Trail land, London Road as follows: High density housing acceptable. Access from London Road. Careful design and landscaping required to ensure a satisfactory relationship with adjoining commercial uses. Flood risk assessment required. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC53	Amend Planning Requirement for Proposal H/11 The Point (former petrol filling station) Road, Apsley as follows: Development to be guided by Town Centre Master Plan (Plough Zone). High density housing is acceptable. High quality design required given prominent

Site Allocations Reference / Section	Amendment Reference	Amendment Required
		town centre gateway location. Flood risk assessment to be undertaken. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC54	Amend Planning Requirement for Proposal H/12 Land r/o St Margarets Way / Datchworth Turn as follows: Proposal subject to outcome of a town and village green application. Development to be guided by existing development brief for site and coordinated with adjoining housing development. Shared access from Green Lane. The development should be designed and landscaped to safeguard the open setting of the site and adjoining land and the amenities of nearby residents. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC55	Amend Planning Requirements for Proposal H/14 Frogmore Road as follows: Access from Durrants Hill Road. Retain access/servicing to Frogmore Paper Mill. Improvements to London Road and Lawn Lane junctions may be required. High density housing is acceptable. Building design and layout must respect the canal frontage. Flood risk assessment required. Development can be brought forward in phases based on landownership, but design, layout and parking must be coordinated with each other. Maintain and enhance footpath link across site to canal foot bridge. Lock Keepers Cottage to be retained. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC56	Delete Proposal H/15 Former Police Station, c/o High Street / Kings Road and replace with new Proposal MU/8 in the Mixed Use Allocations Schedule (map below) and associated change above.
	MC57	Delete Proposal H/16 Berkhamsted Civic Centre and land to r/o High Street and replace with new proposal MU/9 in the Mixed Use Allocations Schedule (map below) and associate change above.
	MC58	Amend Planning Requirements for Proposal H/17 Corner of High Street / Swing Gate Lane as follows: Proposal to provide for a high quality new building on the corner of High Street and Swing Gate Lane to <u>reflect its location in</u> ensure a suitable gateway to the Conservation Area. Nos. 9-13A High Street should be retained and refurbished. There may be scope for modest extensions to the rear of these buildings. <u>Locating the development tight to the rear of the pavement is encouraged.</u> Access should be taken from Swing Gate Lane, at or very close to the existing point of access into the car sales and car valeting sites. Pedestrian access onto High Street would be acceptable. Relaxation of normal requirements for amenity space for the proposed housing appropriate to secure a high quality design. <u>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</u>
	MC59	Amend Planning Requirements of Proposal H/22 Corner of Hicks Road / High Street as follows: High quality scheme required given location in Conservation Area. Predominantly two storey houses or flats to be provided. <u>131 High Street is of heritage merit, and the possibility of retaining the building as an option should be explored. Flood risk assessment required.</u>
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

Site Allocations Reference / Section	Amendment Reference	Amendment Required								
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: (a) There is clear evidence of local need; and (b) No suitable alternative sites are available.								
Education Zones on Policies Map	MC62	Correct the mapping error for EZ/3 North West Berkhamsted to 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><th>Proposal C/1</th><th></th></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.</u> To <u>also</u> 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.</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.</u> To <u>also</u> 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.
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Location:	Land West of Tring									
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Site Allocations Reference / Section	Amendment Reference	Amendment Required								
	MC64	<div>Amend Proposal C/2 as follows:</div> <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 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 and 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.</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 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 and 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.
Proposal C/2										
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Site Area (Ha):	3.0 Ha									
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 and 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.									
Policies Map	MC65	Amend Policies Map for Proposal C/1 to correct misaligned boundary (see map below).								
	MC66	Amend Policies Map for Proposal C/2 to show amendment to site area (see map below).								
Text: 7.12-7.16	MC67	<div>Paragraph 7.12: Amend text as follows to reflect publication of Playing Pitch Action Plan:</div> <div>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 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).</div>								
	E	<div>Paragraph 7.13: Amend text as follows:</div> <div>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 Action Plan which supplements the Outdoor Leisure Facilities Study will be followed up by an Action Plan which can also explore how more effective use can be made of existing provision.</div>								
Schedule of Leisure Proposals and Sites	MC68	<div>Amend Planning Requirements for Proposal L3/ as follows:</div> <table><tr><td>Proposal L/3</td><td></td></tr><tr><td>Location:</td><td>Land to the West of Local Allocation LA5: Icknield Way, Tring</td></tr><tr><td>Site Area (Ha):</td><td>6.5 Ha</td></tr><tr><td>Planning Requirements:</td><td>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. 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. See site master plan.</td></tr></table>	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. 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. See site master plan.
Proposal L/3										
Location:	Land to the West of Local Allocation LA5: Icknield Way, Tring									
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Site Allocations Reference / Section	Amendment Reference	Amendment Required
	SC10	Add new Proposal L/4 under Tring <div> <div>Proposal L/4</div> <div> <div>Location:</div> <div>Site Area (Ha):</div> <div>Planning Requirements:</div> </div> <div> <div>Dunsley Farm, London Road, Tring</div> <div>2.7 Ha</div> <div>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.</div> </div> </div>
Policies Map	SC11	Amend Policies Map for Proposal L/3 to show amendment to site area (see map below).
	SC12	Add map for new Proposal L/4 to Policies Map (see map below).
LOOKING AFTER THE NATURAL ENVIRONMENT		
Strategic Objectives		No change
Introduction	E	Number paragraphs 8.1 – 8.3
8. Enhancing the Natural Environment		
Text: 8.1-8.12	E	Renumber paragraphs, starting at 8.4, to follow sequentially from introductory text above.
Policies Map	MC69	Add two newly designated Wildlife Sites (former Halsey School, Hemel Hempstead and Westbrook Hay Golf Course, Bourne End) to the Policies Map (see maps below).
9. Conserving the Historic Environment		
Text: 9.1-9.9	E	Paragraphs 9.2-9.4: Replace references to English Heritage with Heritage England.
Policies Map	SC13	Amend Policies Map to show amended boundary of Locally Registered Historic Park and Garden at Shendish (see map below)
	E	Amend the boundary of the Policies Map to reflect changes to the Conservation Area for Hemel Hempstead Old Town (2 areas), to reflect changes made as part of the recent Conservation Area Appraisal update
	E	Amend the boundary of the Policies Map to reflect changes to the Conservation Area for Berkhamsted (4 areas), to reflect changes made as part of the recent Conservation Area Appraisal update
10. Introduction to Place Strategies		
Text: 10.1-10.2		No change
11. Hemel Hempstead Place Strategy		
Text: 11.1-11.2	E	Consequential changes to schedules and maps as a result of amendments referred to above.
Schedule for Hemel Hempstead		
Text: 11.3		
Hemel Hempstead Place Strategy Map		
South Hemel Hempstead Inset Map		
Hemel Hempstead Town Centre Inset Map		
12. Berkhamsted Place Strategy		
Text:12.1-12.2	E	Consequential changes to schedule and map as a result of amendments referred to above.
Schedule for Berkhamsted		
Text: 12.3		
Berkhamsted Place Strategy Map		

Site Allocations Reference / Section	Amendment Reference	Amendment Required
13. Tring Place Strategy		
Text: 13.1-13.2	E	Consequential changes to schedule and map as a result of amendments referred to above.
Schedule for Tring		
Text: 13.3		
Tring Place Strategy Map		
14. Kings Langley Place Strategy		
Text: 14.1-14.2	E	Consequential changes to schedule and map as a result of amendments referred to above.
Schedule for Kings Langley		
Text: 14.3		
Kings Langley Place Strategy Map		
15. Bovingdon Place Strategy		
Text: 15.1-15.2	E	Consequential changes to schedule and map as a result of amendments referred to above.
Schedule for Bovingdon		
Text: 15.3		
Bovingdon Place Strategy Map		
16. Markyate Place Strategy		
Text: 16.1-16.2	E	Consequential changes to schedule and map as a result of amendments referred to above.
Schedule for Markyate		
Text: 16.3		
Markyate Place Strategy Map		
17. Countryside Place Strategy		
Text: 17.1-17.2	E	Consequential changes to schedule and map as a result of amendments referred to above.
Schedule for Countryside		
Text: 17.3		
Countryside Strategy Map		
PART C		
IMPLEMENTATION AND DELIVERY		
Strategic Objectives		No change
18. Monitoring and Review		
Text: 18.1-18.8		No change
PART D		
Appendices		
Appendix 1		No change
Appendix 2	E	Update Appendix 2: Updated Housing Trajectory – 2006-2031 in light of new monitoring information for April 2015.
Appendix 3	MC70	Update Appendix 3: Infill Areas for Major Developed Sites in the Green Belt to show the new infill area for MDS/7 (formerly MDS/6) Kings Langley School, Love Lane.
	MC71	Update Appendix 3: Infill Areas for Major Developed Sites in the Green Belt to show the infill area for MDS/8 (formerly MDS/7) Bourne End Mills Employment Area, Bourne End.
Appendix 4		No change
Appendix 5	E	Update Appendix 5: Schedules of Designated Biological, Geological and Historic Assets to insert date for latest review of Hemel Hempstead Conservation Area (i.e. January 2012).
	E	Update the total number of wildlife sites to reflect position as at June 2015.
	MC72	Add Gaddesden Park, Bridens Camp to list of Locally Registered Historic Parks and Gardens.
Appendix 6		No change

MAP AMENDMENTS:

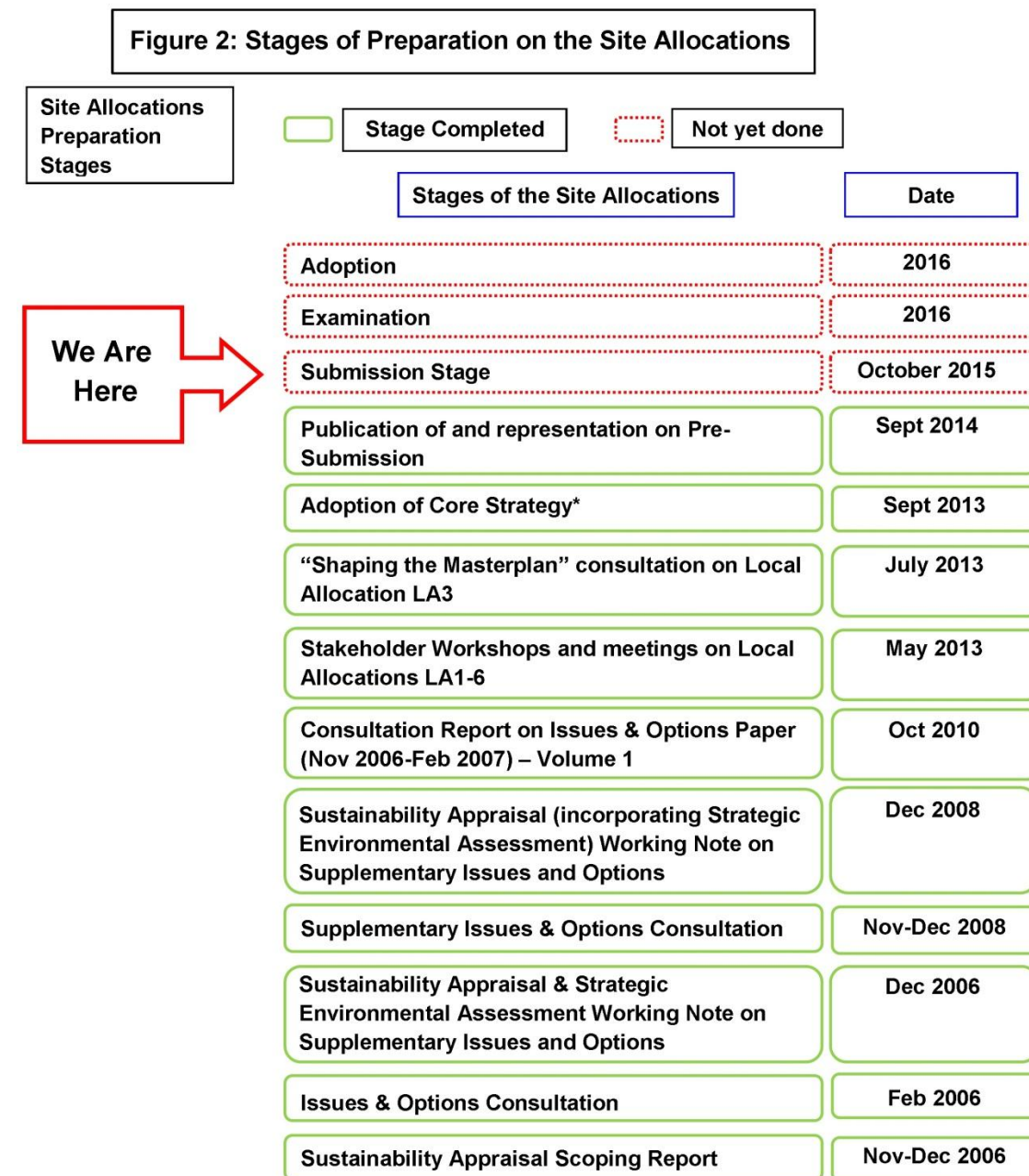
1. Changes to maps / diagrams embedded within Written Statement are as follows:

INTRODUCTION

- Page 6: Figure 2: Stages in Preparation of the Site Allocations

Figure 2

Insert new diagram as follows:



*Note: Please see Figure 2 in Core Strategy for stages in the preparation of that document.

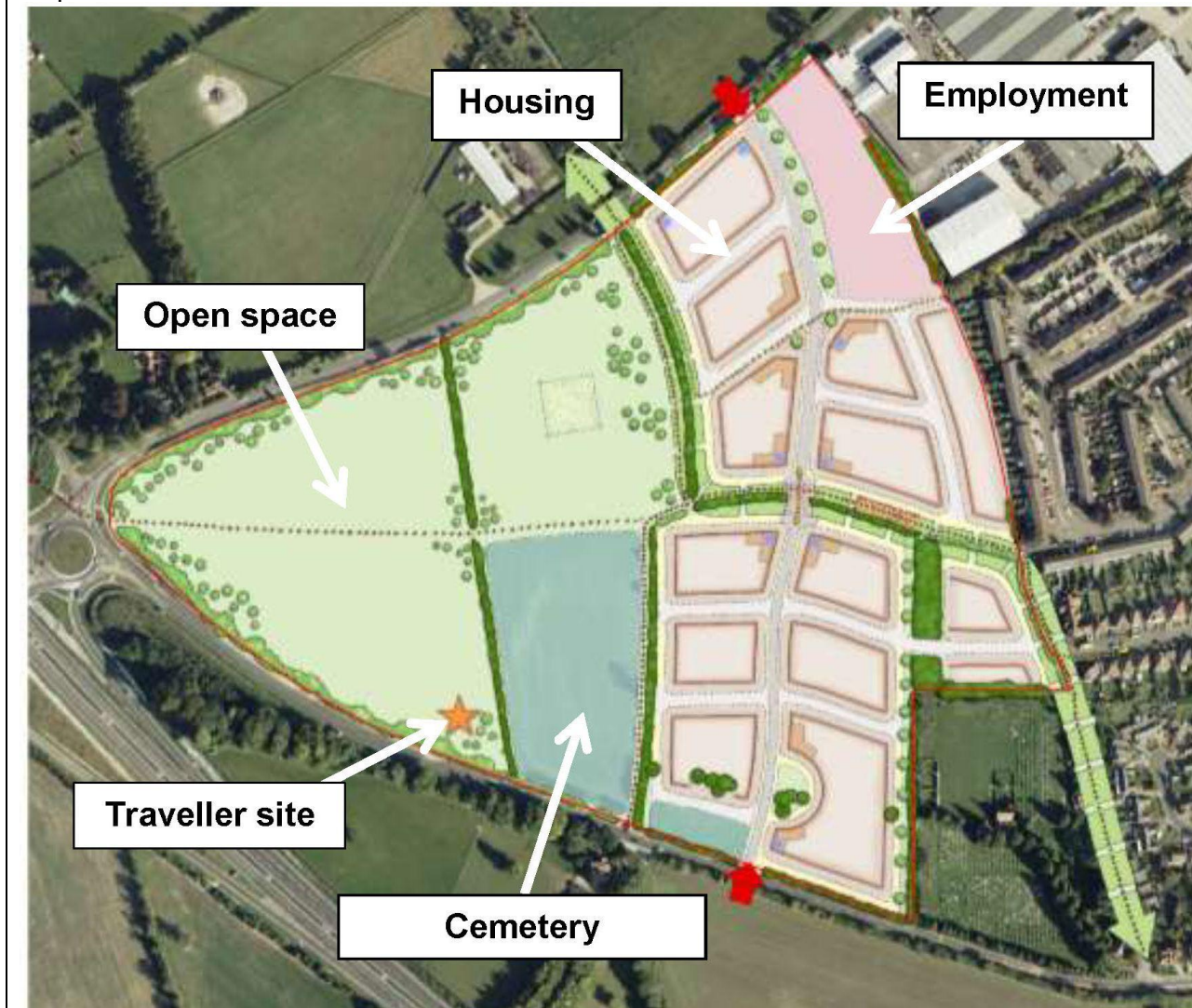
PROVIDING HOMES

- Page 64: Policy LA5 – Indicative Spatial Layout – amended layout (shown below)

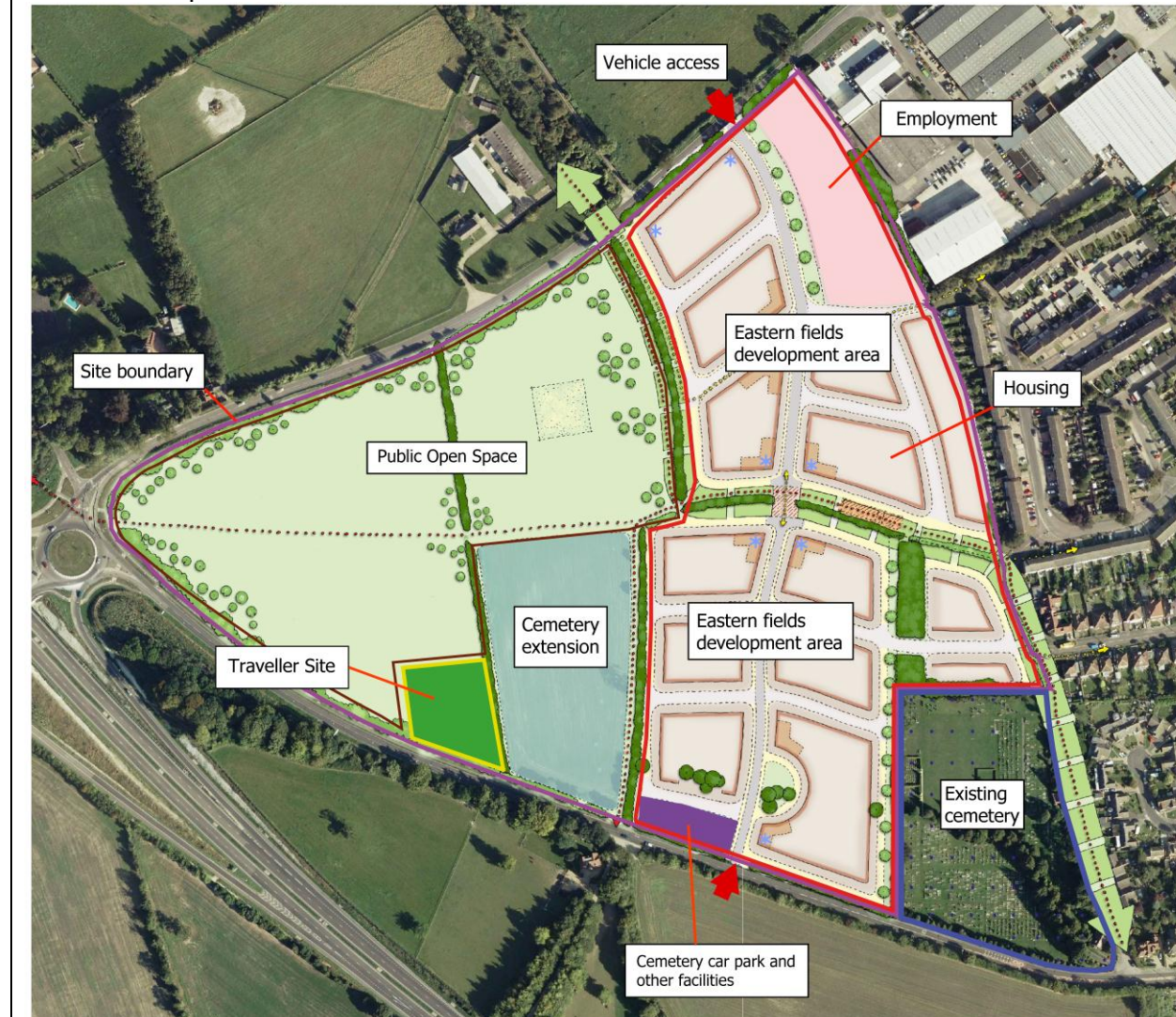
Policy LA5

Amended Indicative Spatial Layout

Map in current document:



Amended map:



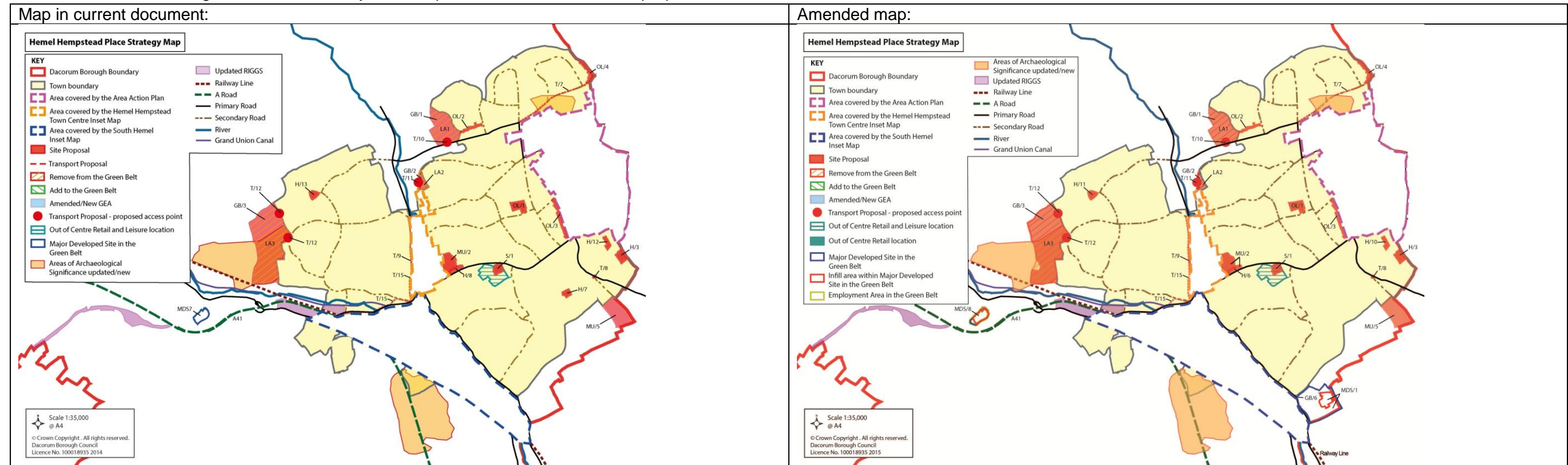
PLACE STRATEGIES

- Page 95: Hemel Hempstead Place Strategy Map - to show amended Housing, Mixed Use and Major Developed Sites in the Green Belt proposals.
- Page 96: South Hemel Hempstead Inset Map - to show amended Housing proposal references.
- Page 97: Hemel Hempstead Town Centre Inset Map - to show amended Housing proposal references.
- Page 100: Berkhamsted Place Strategy Map - to show amended Housing, Mixed Use and Major Developed Sites proposals references and boundaries.
- Page 103: Tring Place Strategy Map - to show amended Housing, Community, Leisure proposals and Green Belt boundary references and boundaries.
- Page 105: Kings Langley Place Strategy Map - to show amended Major Developed Site proposal reference.
- Page 107: Bovingdon Place Strategy Map - to show amended Major Developed Site proposal references.
- Page 109: Markyate Place Strategy Map - to show amended Housing proposal references.
- Page 112: Countryside Strategy Map - to show amended Major Developed Sites in the Green Belt proposals.

Note: All changes are consequential to changes listed in main schedule.

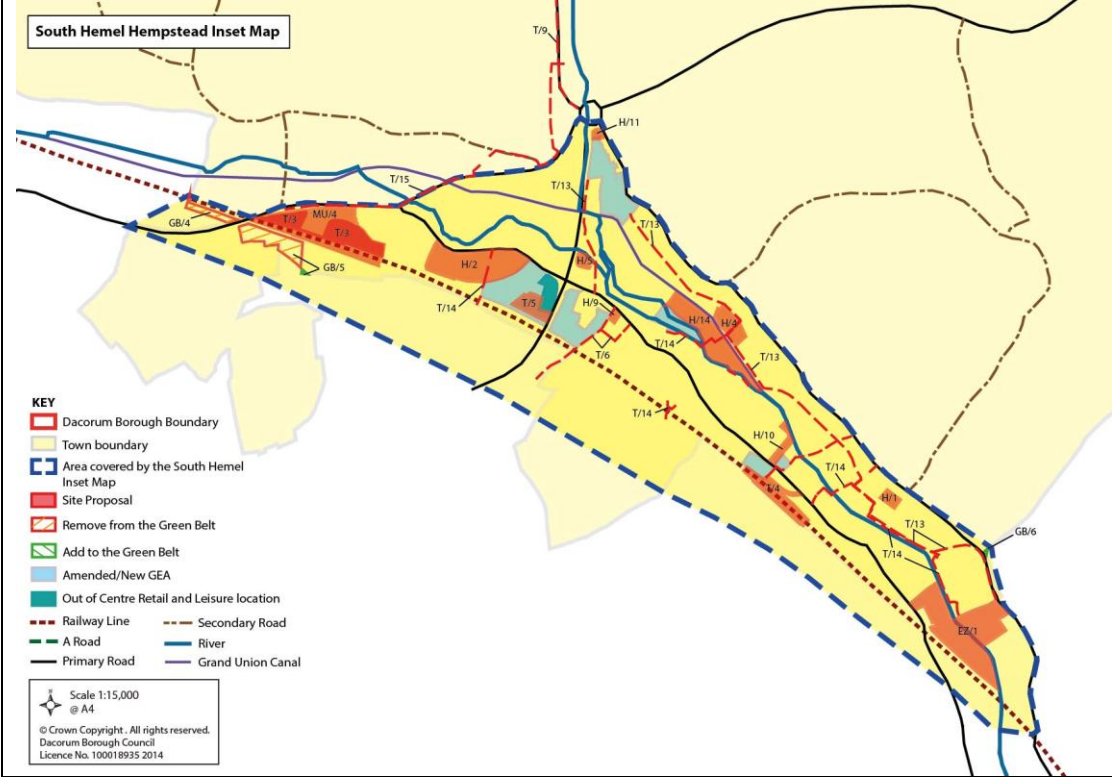
Hemel Hempstead Place Strategy Map

Amended to show Housing, Mixed Use and Major Developed Sites in the Green Belt proposals

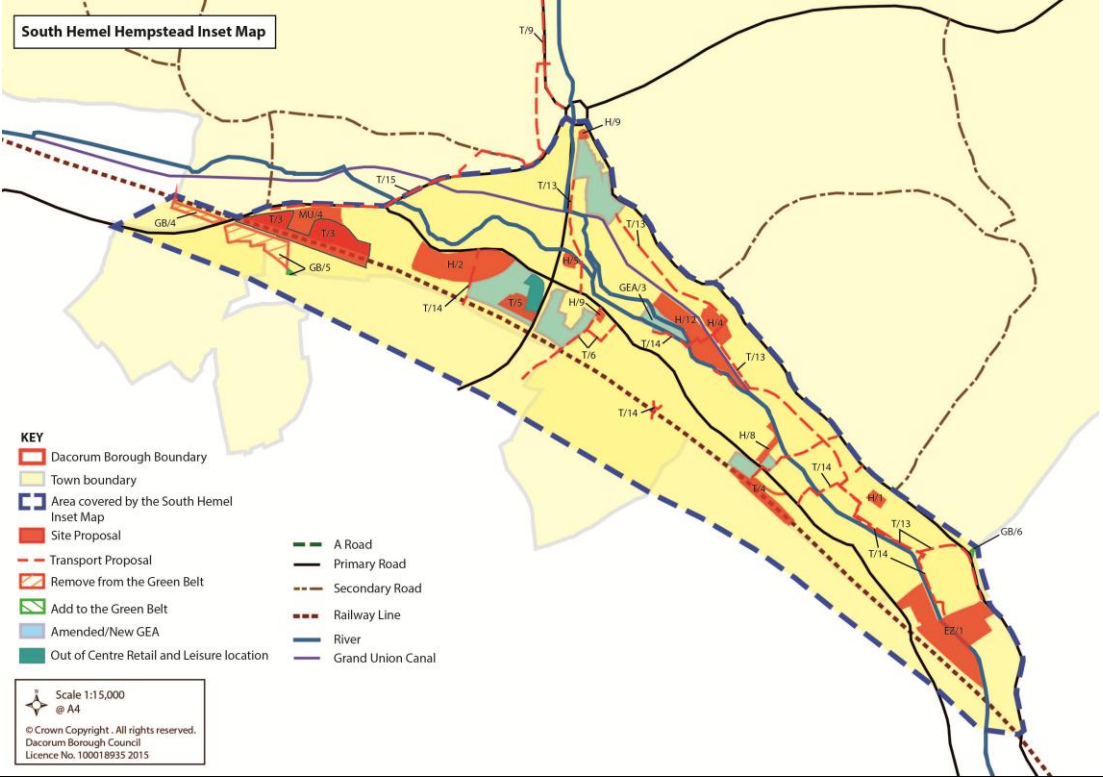


South Hemel Hempstead Inset Map
Amended to show Housing proposal references

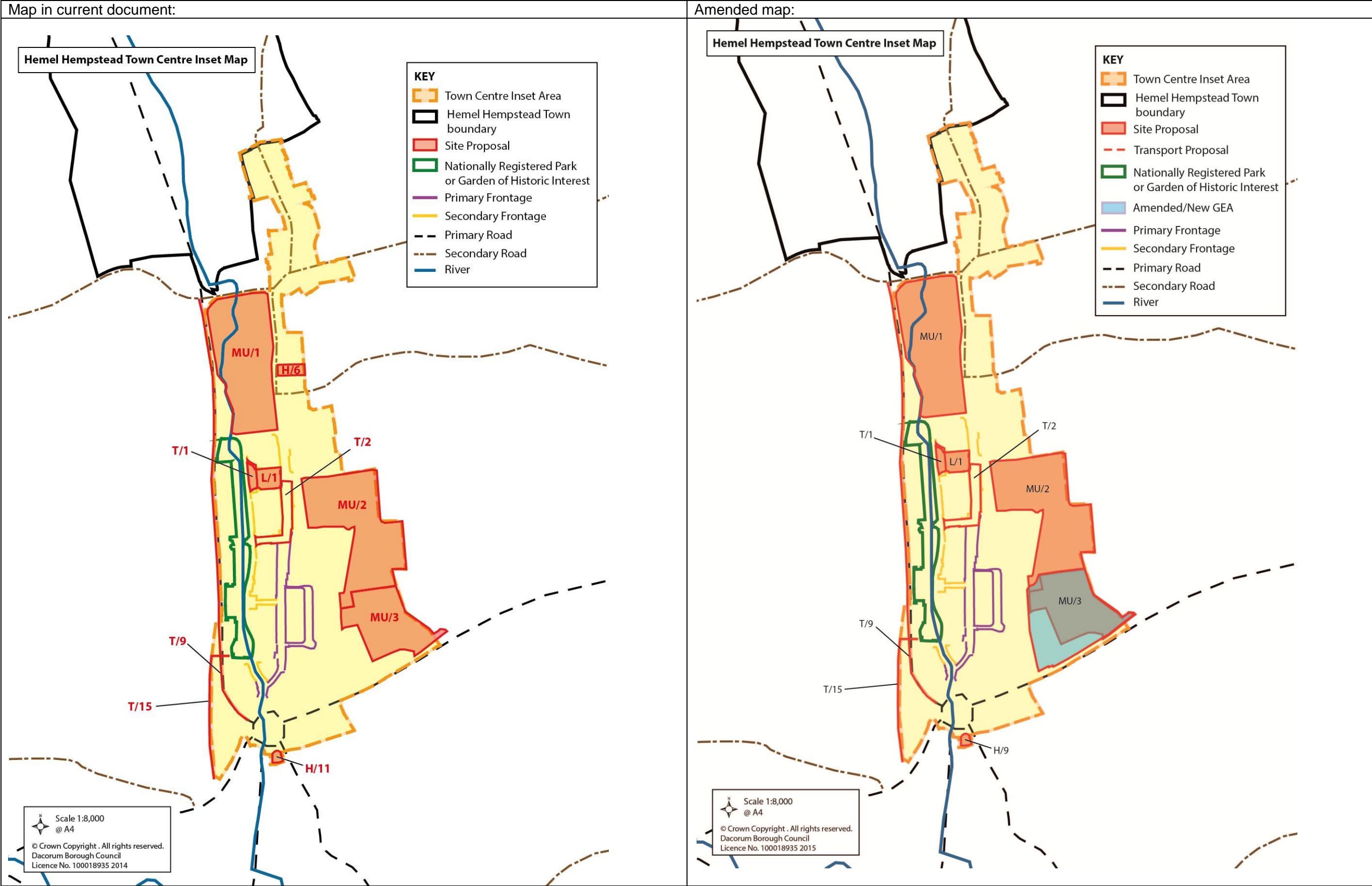
Map in current document:



Amended map:

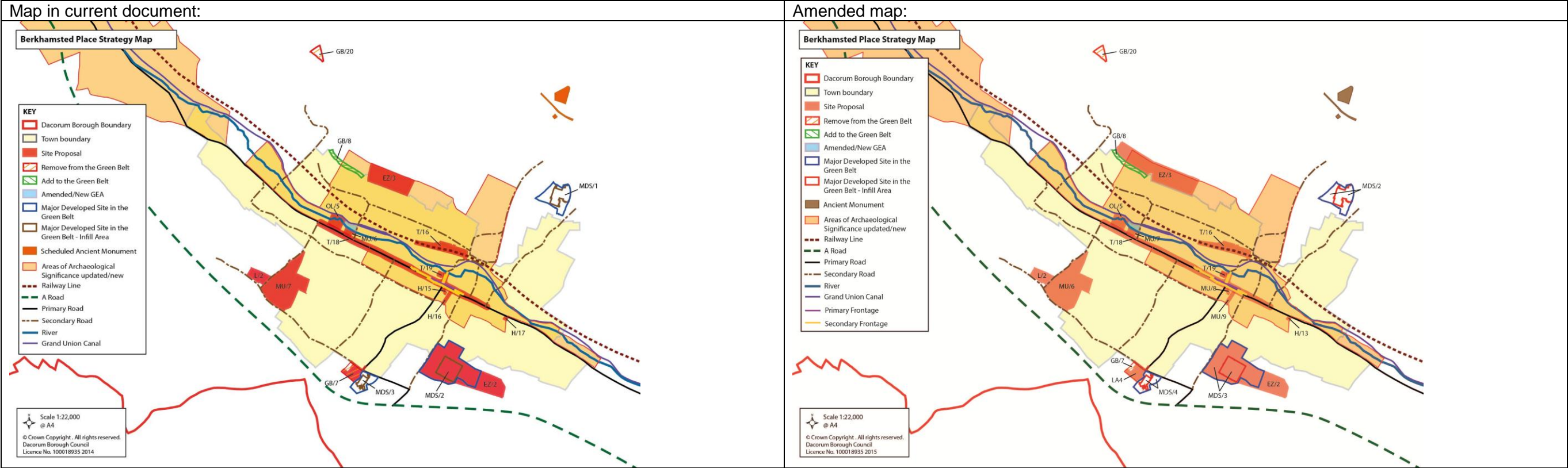


Hemel Hempstead Town Centre Inset Map
 Amended to show Housing proposal references



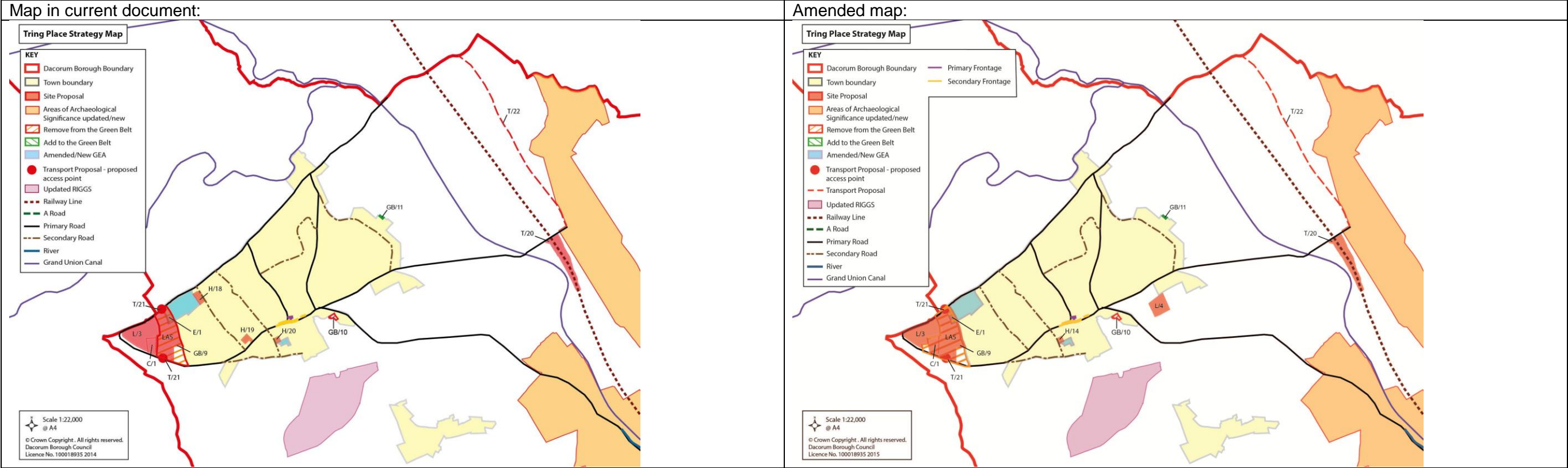
Berkhamsted Place Strategy Map

Amended to show Housing, Mixed Use and Major Developed Sites proposals



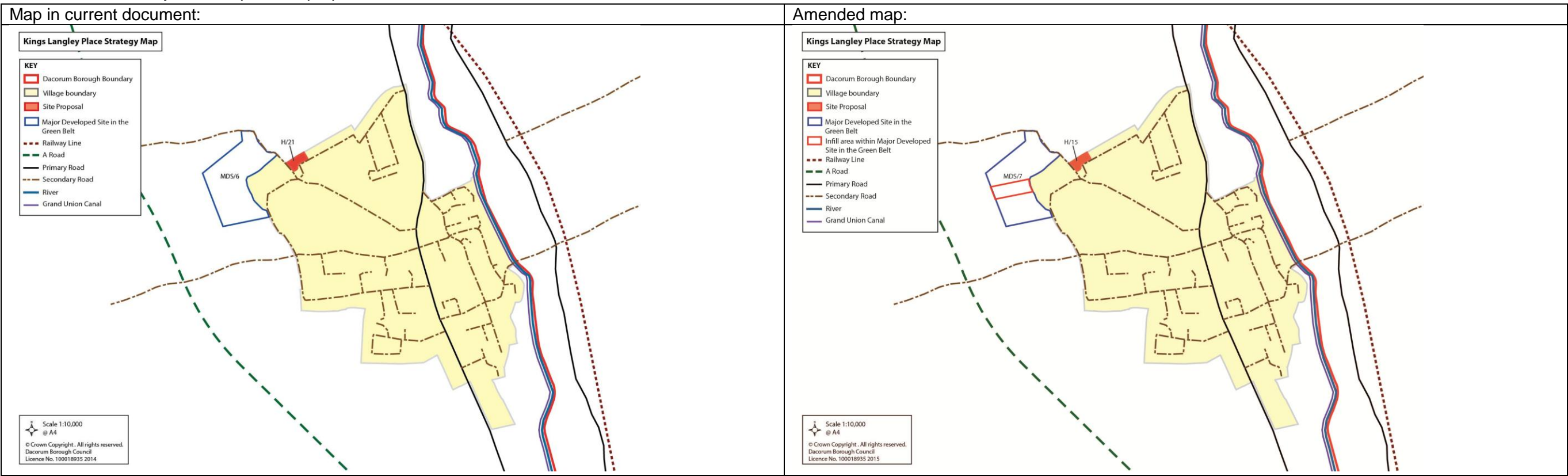
Tring Place Strategy Map

Amended to show Housing, Community, Leisure proposals and Green Belt boundary references and boundaries



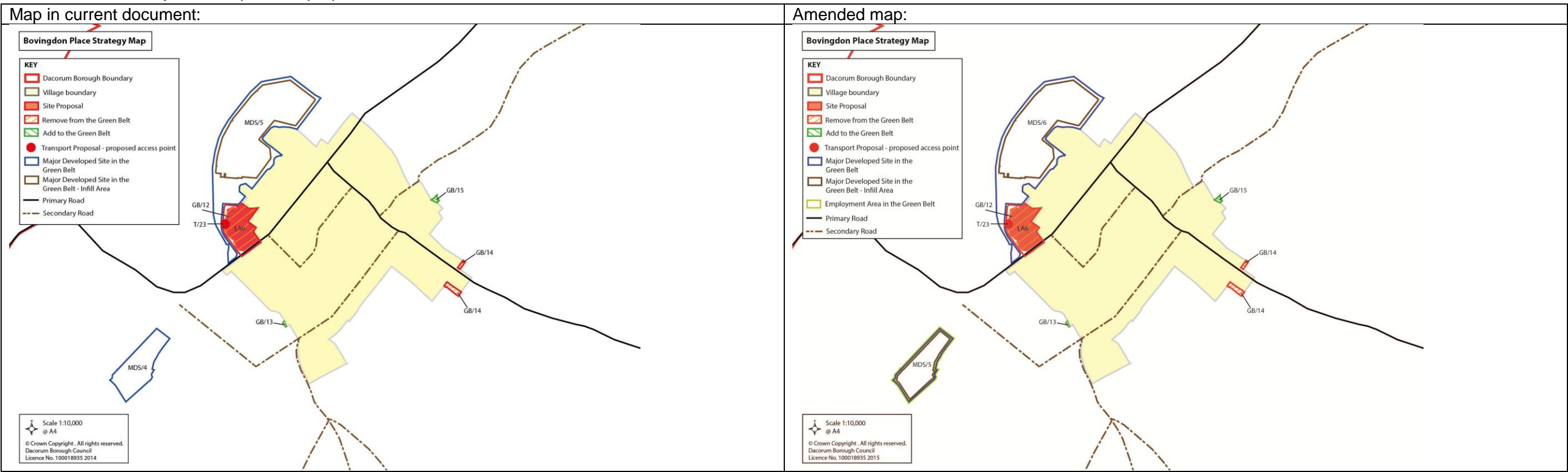
Kings Langley Place Strategy Map

Amended to show Major Developed Site proposal reference



Bovingdon Place Strategy Map

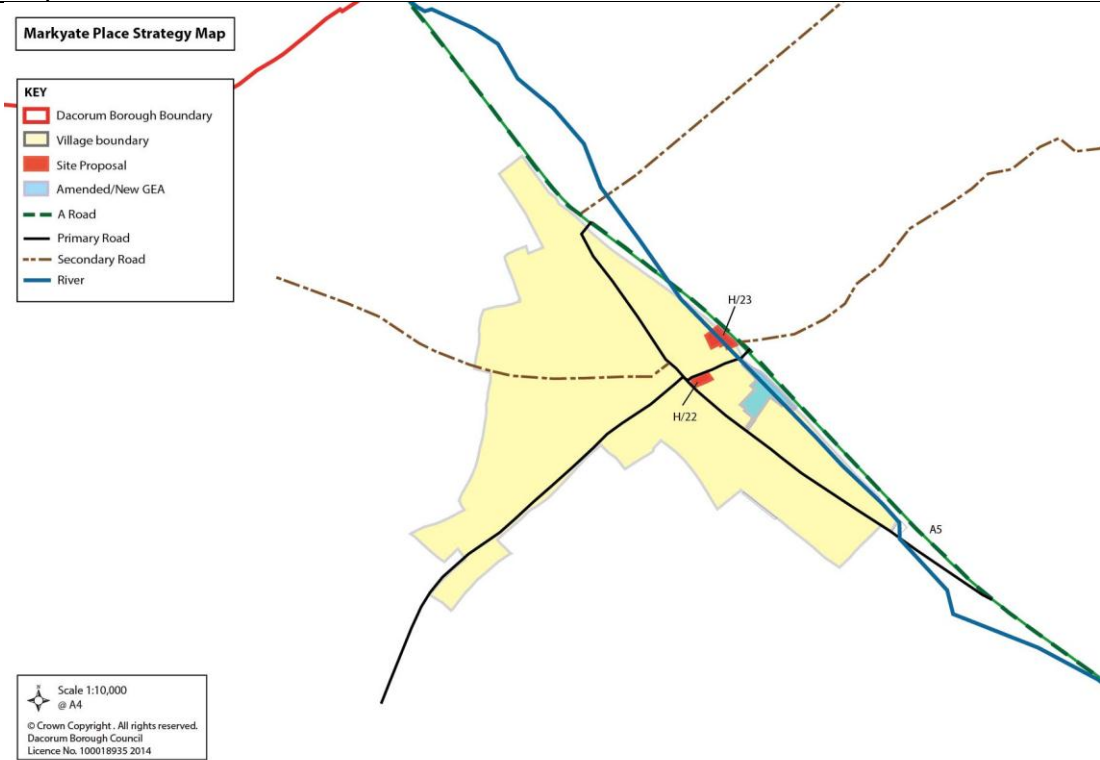
Amended to show Major Developed Site proposal references



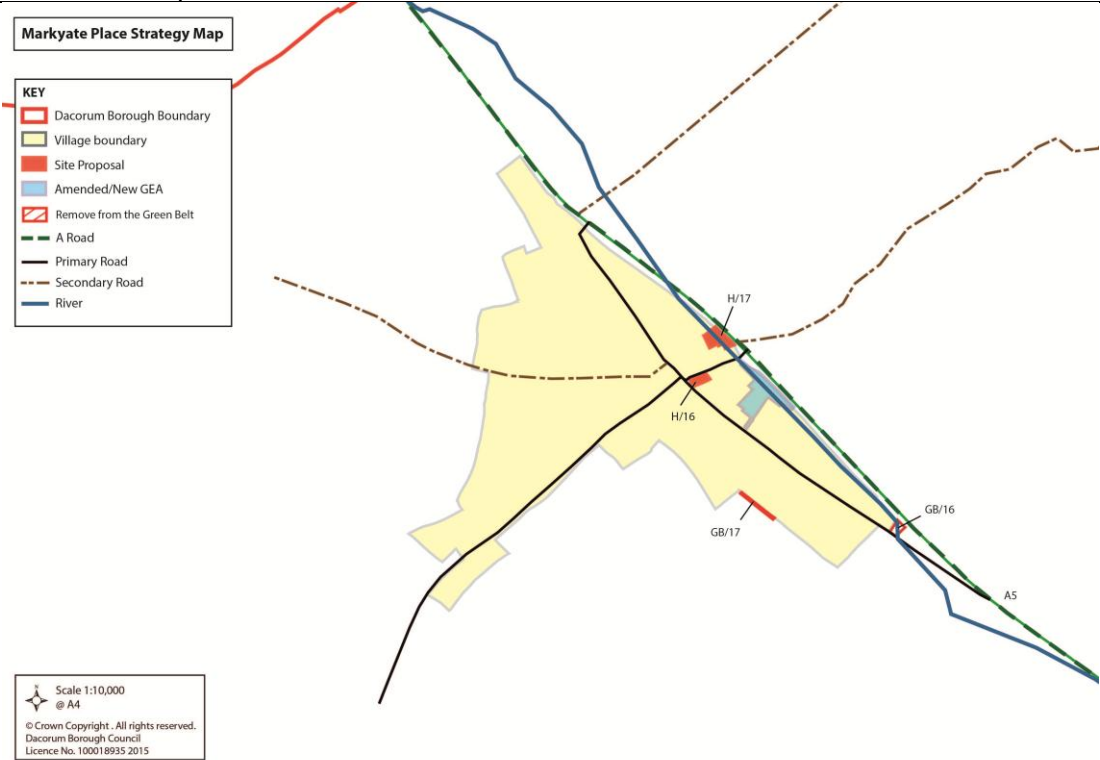
Markyate Place Strategy Map

Amended to show Housing proposal references

Map in current document:



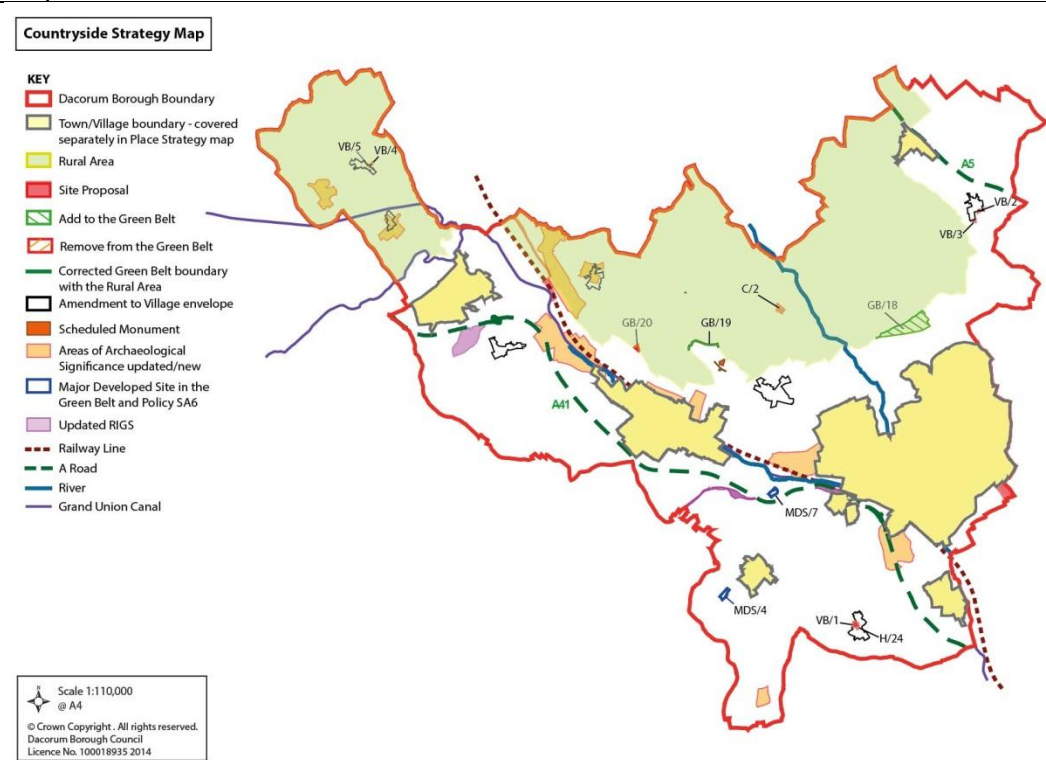
Amended map:



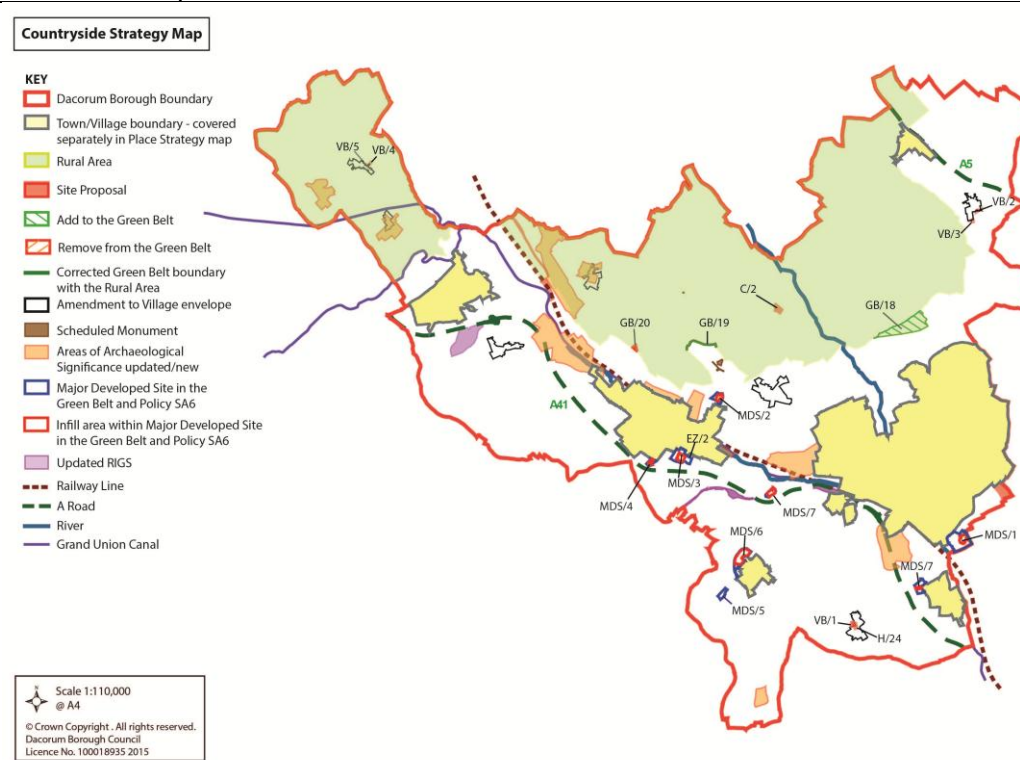
Countryside Strategy Map

Amended to show Major Developed Sites in the Green Belt proposals

Map in current document:



Amended map:



APPENDICES

Appendix 3: Infill Areas for Major Developed Sites in the Green Belt:

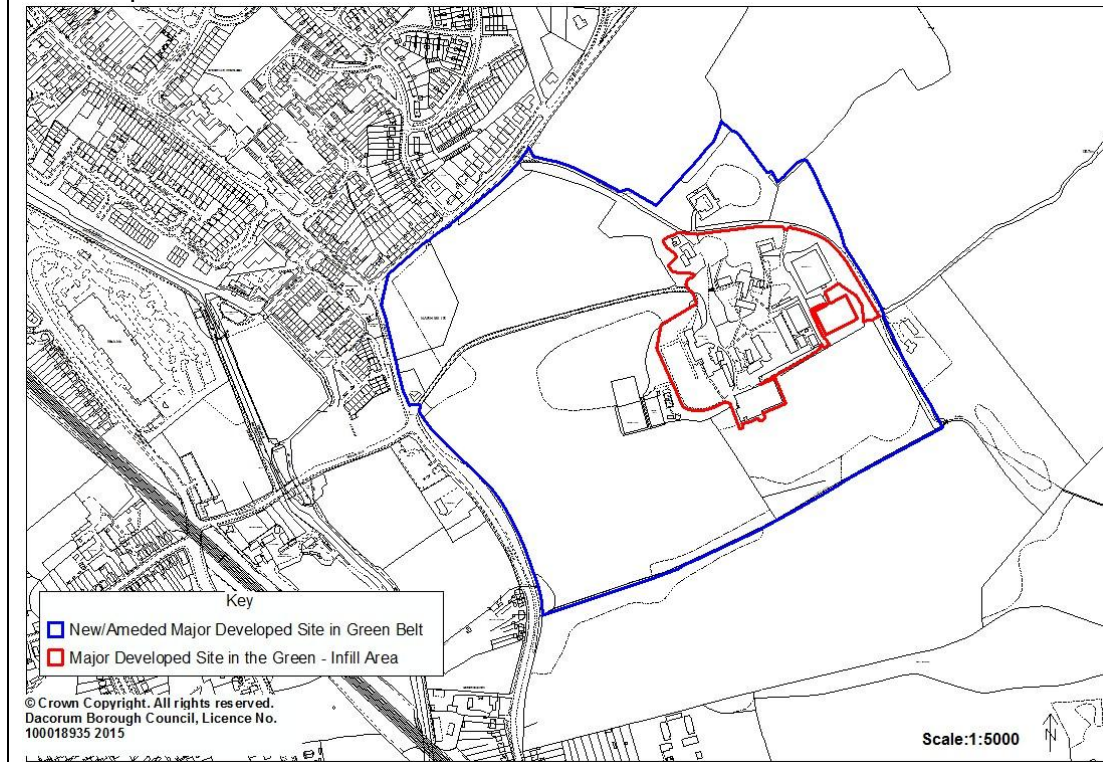
Show the new infill areas for the following:

- Abbott's Hill School MDS (see map below)
- Kings Langley School MDS (shown below)
- Bourne End Mills MDS (shown below)

MDS/1 Abbots Hill School – new designation

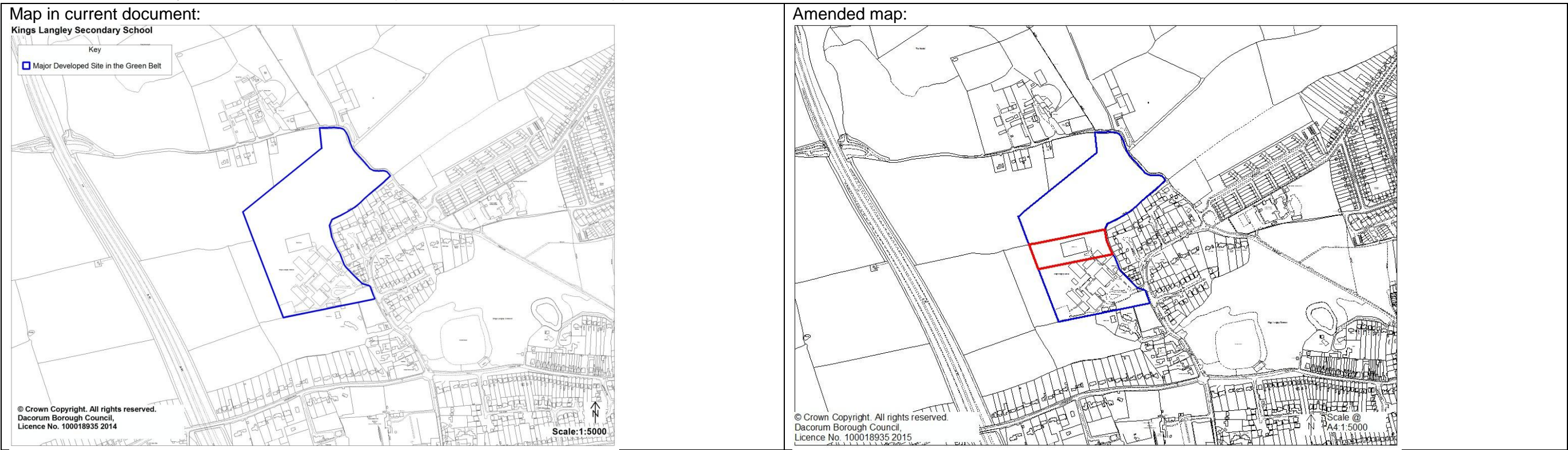
Note: External boundary to be shown on Policies Map. Infill area to be shown in Appendix 3 of Written Statement

New Map:



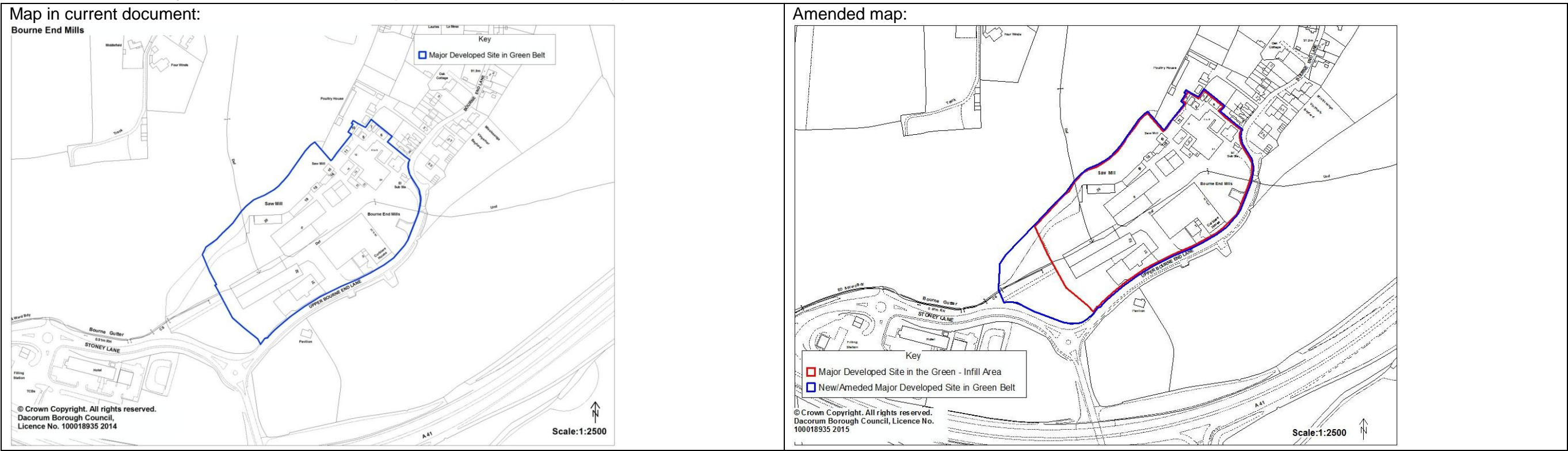
MDS/6 Kings Langley School – to show extent of new infill area (reference change to MDS/7 due to addition of new MDS/1)

Note: External Boundary to be shown on Policies Map. Infill area to be shown in Appendix 3 of Written Statement.



MDS/7 Bourne End Mills – to show new infill area (reference to be changed to MDS8 due to addition of new MDS/1)

Note: External Boundary to be shown on Policies Map. Infill area to be shown in Appendix 3 of Written Statement.



2. Amendments to Map Book to correct minor errors/omissions and show new / revised designations:

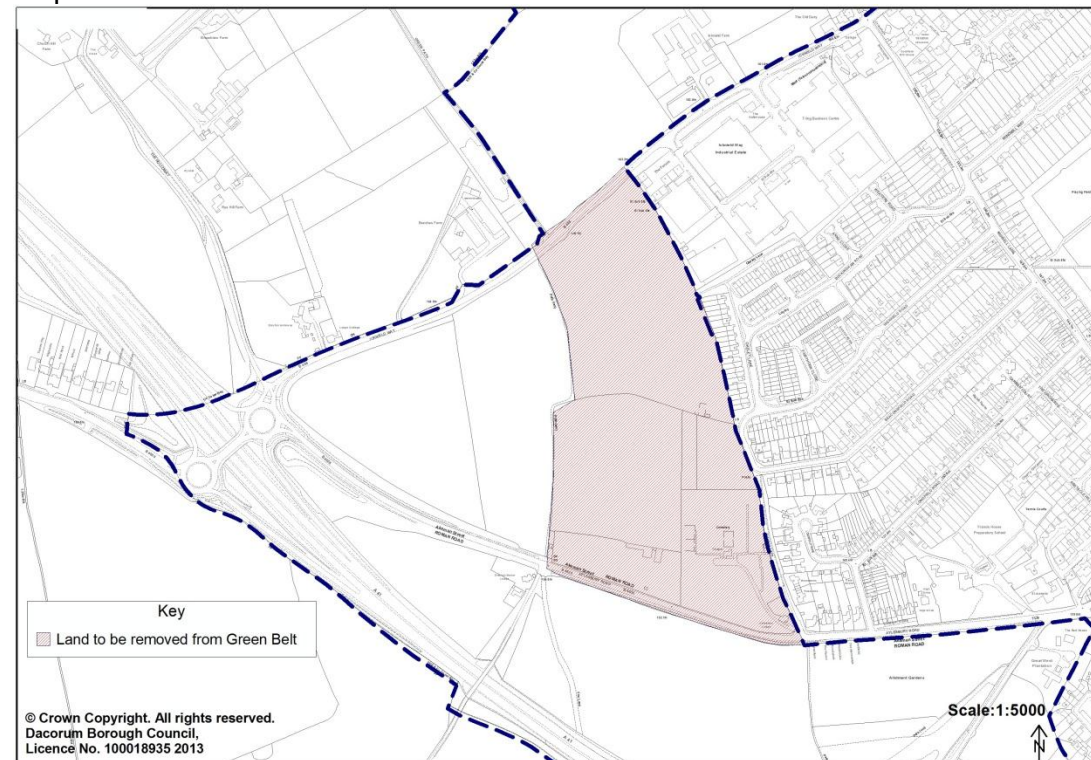
THE SUSTAINABLE DEVELOPMENT STRATEGY

- Page 9: amend GB/9 boundary for LA5 West Tring to reflect enlarged area to be removed from the Green Belt (see below).
- Page 18: new MDS/1 for Abbots Hill School (shown below).
- Page 21: amend MDS/7 to show extended external boundary and new infill area (reference to be changed to MDS8 due to addition of new MDS1) (shown below).
- Page 22: amend MU/2 to show enlarged area previously designated at H/8 (shown below).
- Page 25: new MU/8 proposal showing larger site area (to replace H/15) (shown below).
- Page 25: new MU/9 proposal (to replace H/16) (shown below).

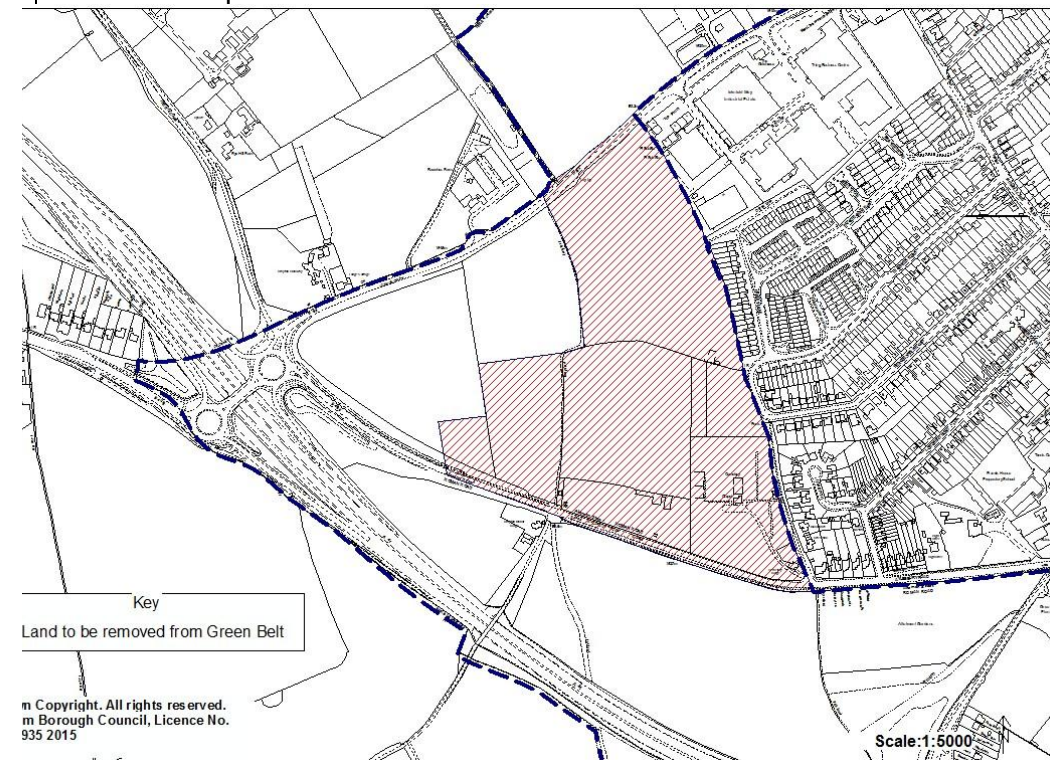
Green Belt Boundary Amendments

GB/9 West Tring – boundary amendment

Map in current document:



Amended map:

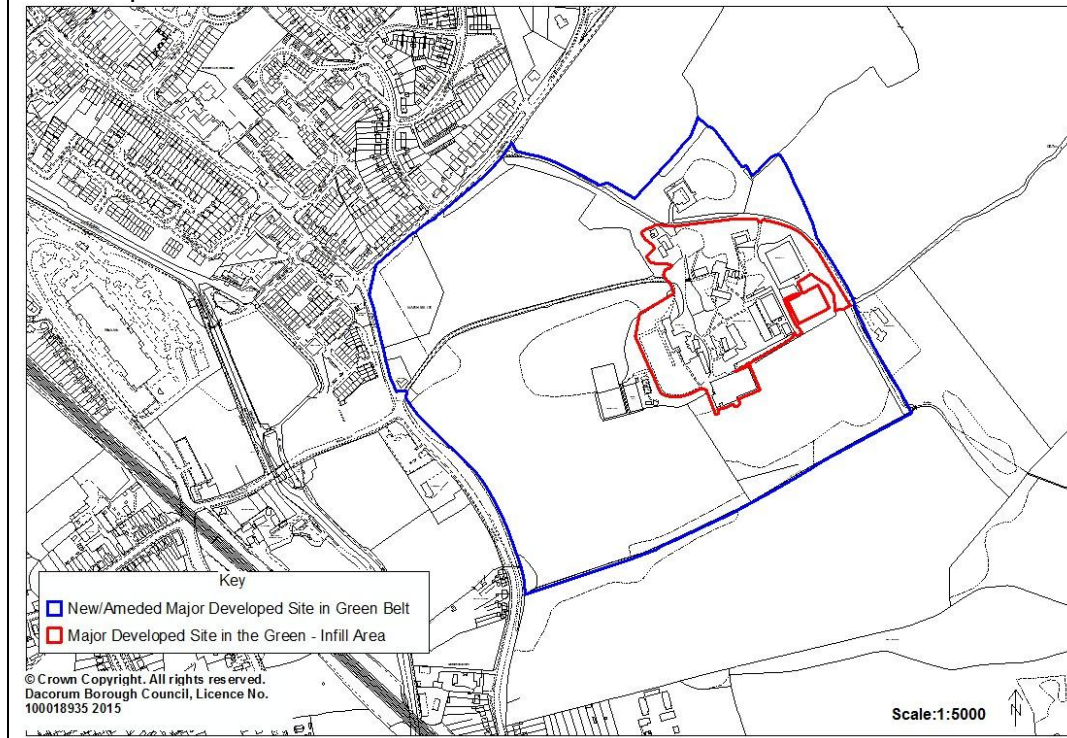


Major Developed Sites in the Green Belt

MDS/1 Abbots Hill School – new designation

Note: External area to be shown on Policies Map. Infill area to be shown in Appendix 3 of Written Statement

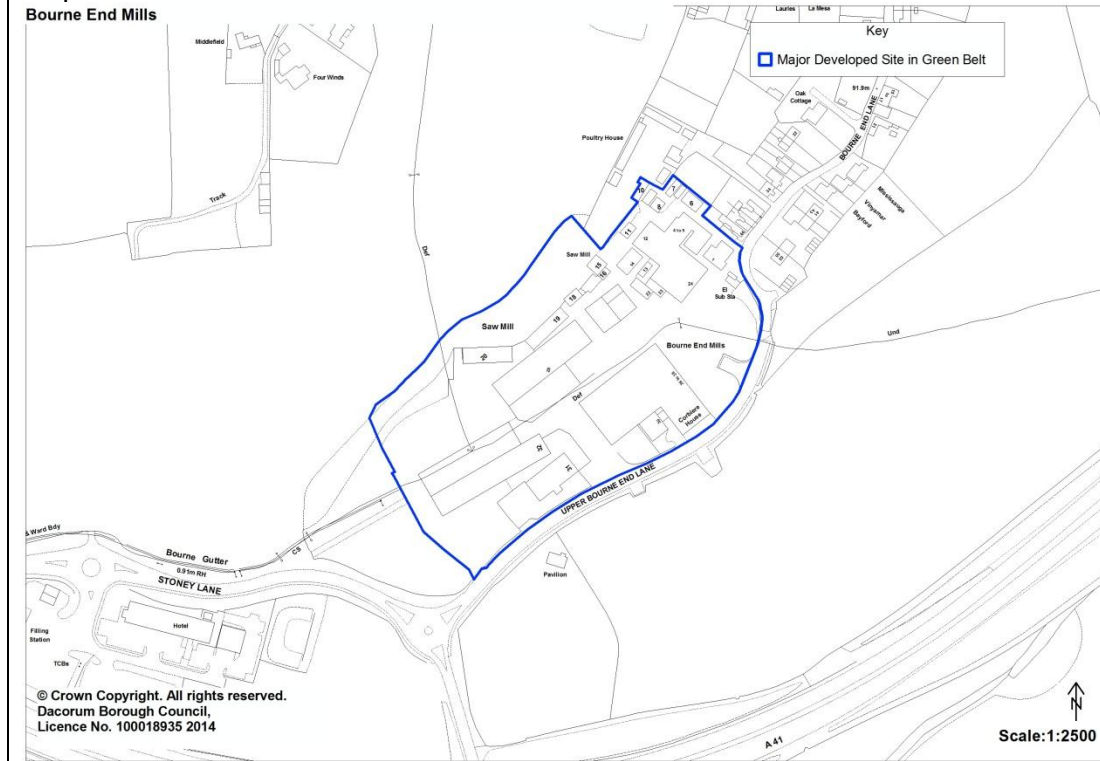
New Map:



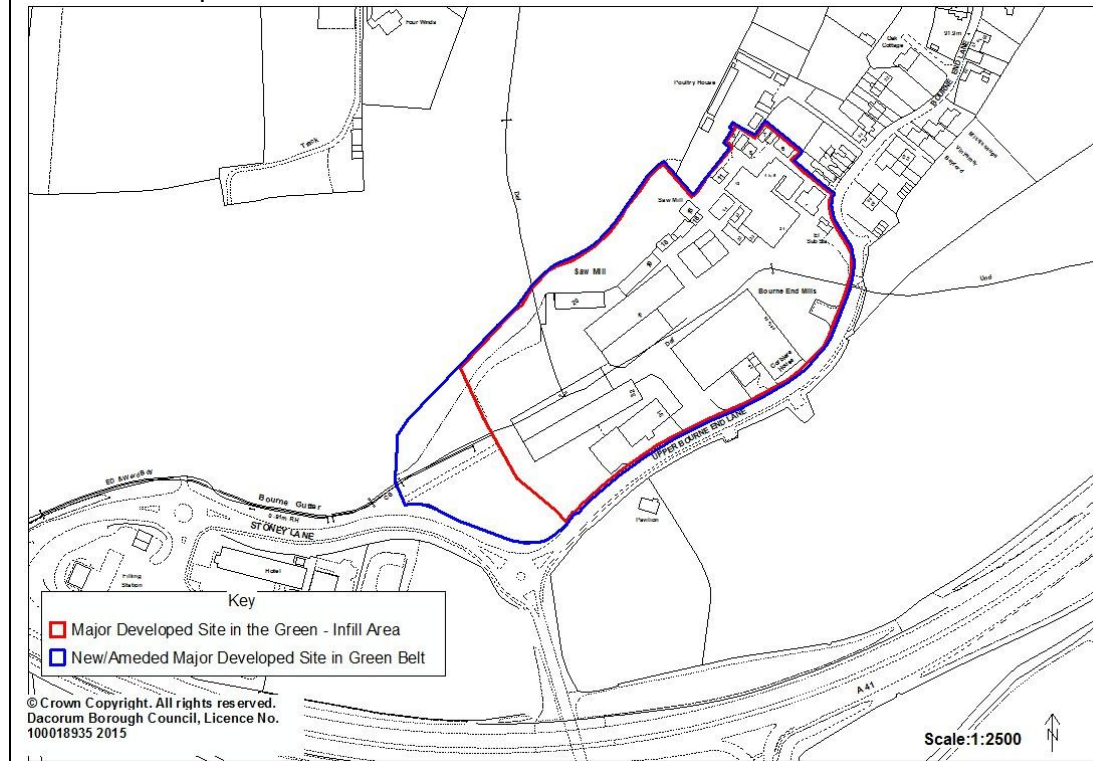
MDS/7 Bourne End Mills – to show extended external boundary and new infill area (reference to be changed to MDS8 due to addition of new MDS1)

Note: External Boundary to be shown on Policies Map. Infill area to be shown in Appendix 3.

Map in current document:



Amended map:



Note: All MDS designations renumbered as follows (to reflect inclusion of new MDS/1: Abbott's Hill School)

Old reference	New reference	Site
-	MDS/1	Abbott's Hill School
MDS/1	MDS/2	Berkhamsted Castle Village
MDS/2	MDS/3	Ashlyns School
MDS/3	MDS/4	British Film Institute
MDS/4	MDS/5	Bovingdon Brickworks
MDS/5	MDS/6	Bovingdon Prison
MDS/6	MDS/7	Kings Langley School
MDS/7	MDS/8	Bourne End Mills

Mixed Use Development

MU/2: Hemel Hempstead Hospital Site, Hillfield Road, Hemel Hempstead – amended to show larger area (comprising addition of The Dell)

Map in current document:



Amended map:



MU/8: Former Police Station and Library site, r/o High Street / Kings Road, Berkhamsted – amended designation from H/15 (which has been deleted). New proposal MU/8 showing larger site area.

New Map:



MU/9: Berkhamsted Civic Centre and land to the r/o High Street, Berkhamsted – amended designation from H/16 (which has been deleted).

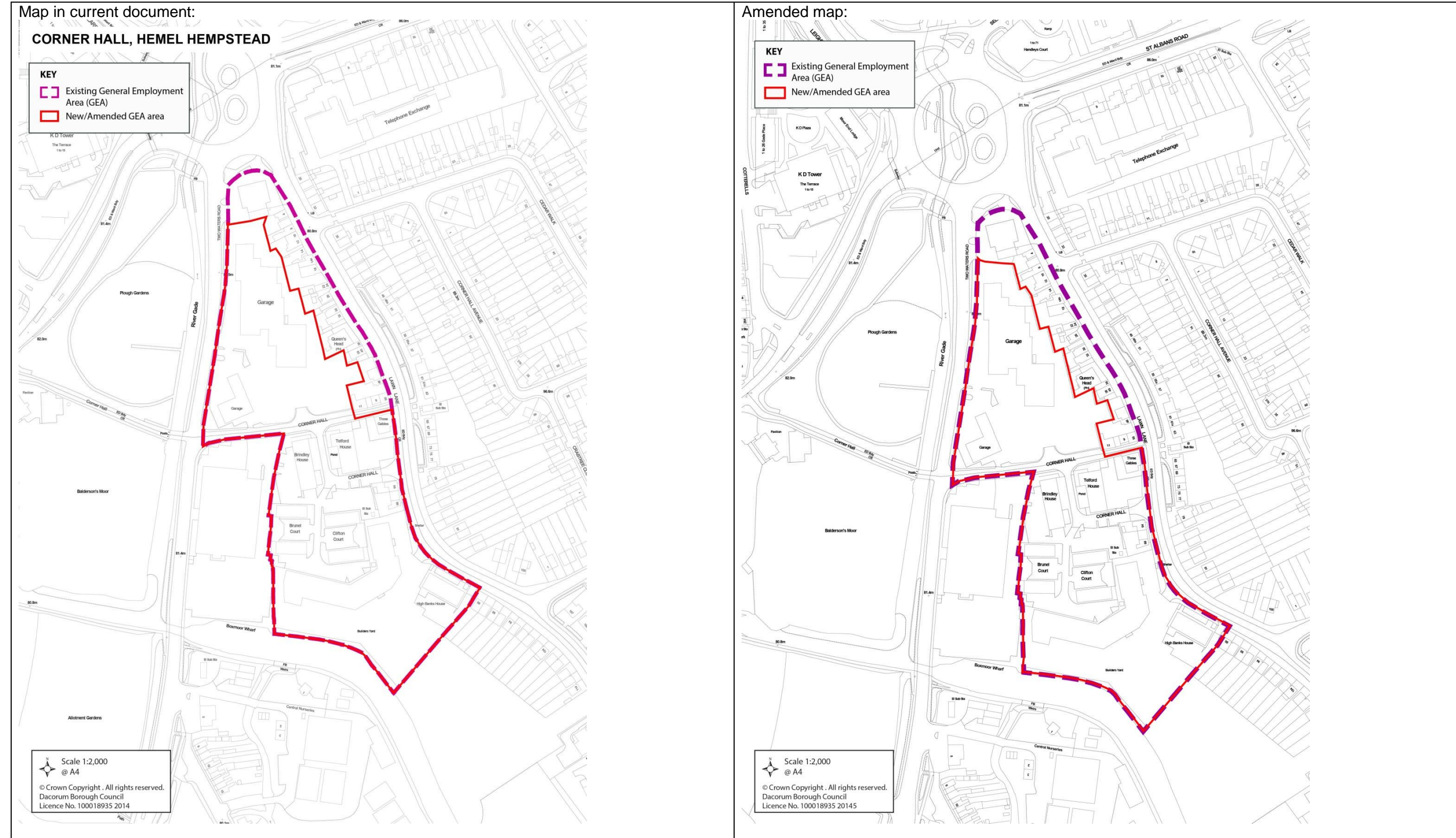


STRENGTHENING ECONOMIC PROSPERITY

- Page 44: Corner Hall, Hemel Hempstead – amended boundary (shown below).
- Page 49: Bourne End Mills - Employment Area in the Green Belt. Amended boundary to include south western part of site (shown below).

General Employment Area

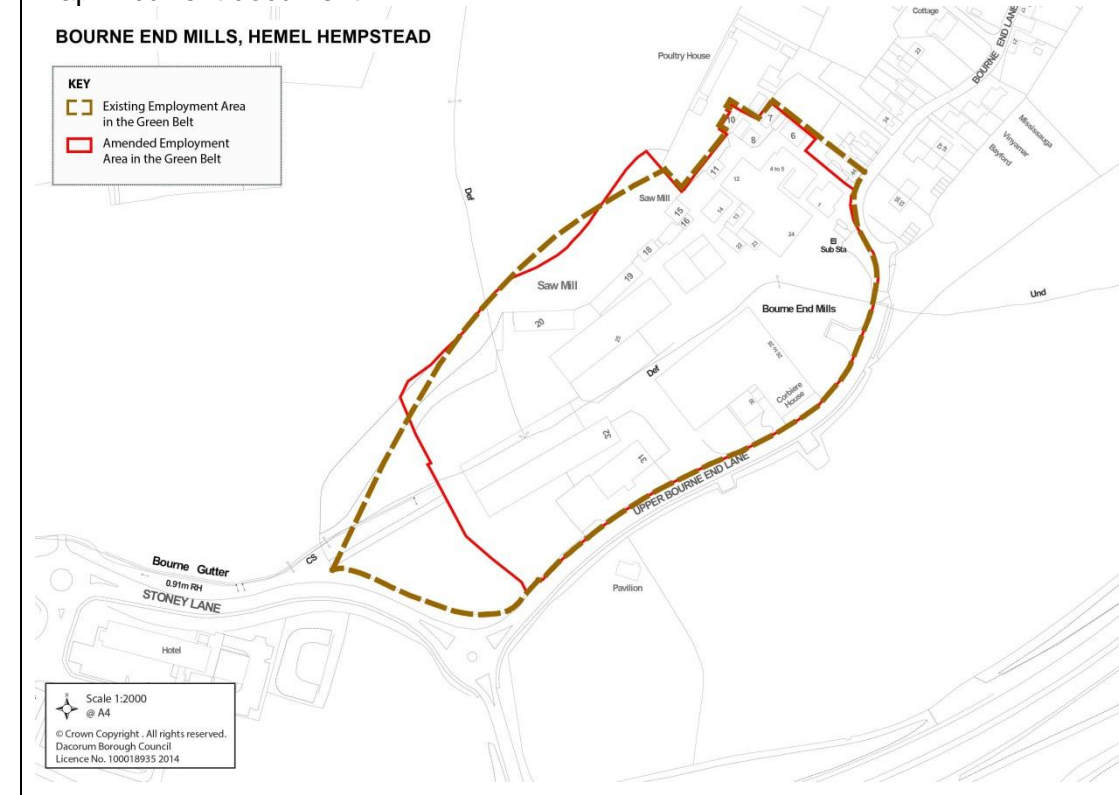
Corner Hall, Hemel Hempstead – amended boundary



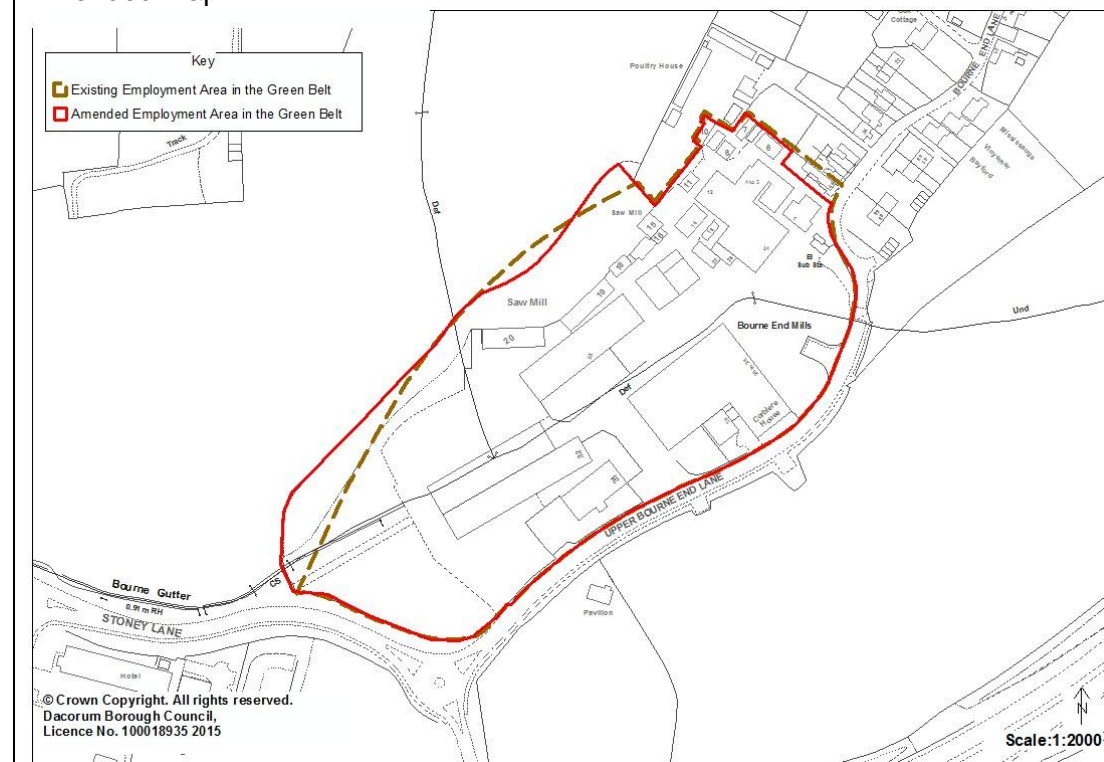
Employment Sites in the Green Belt

Bourne End Mills – amended boundary

Map in current document:



Amended map:



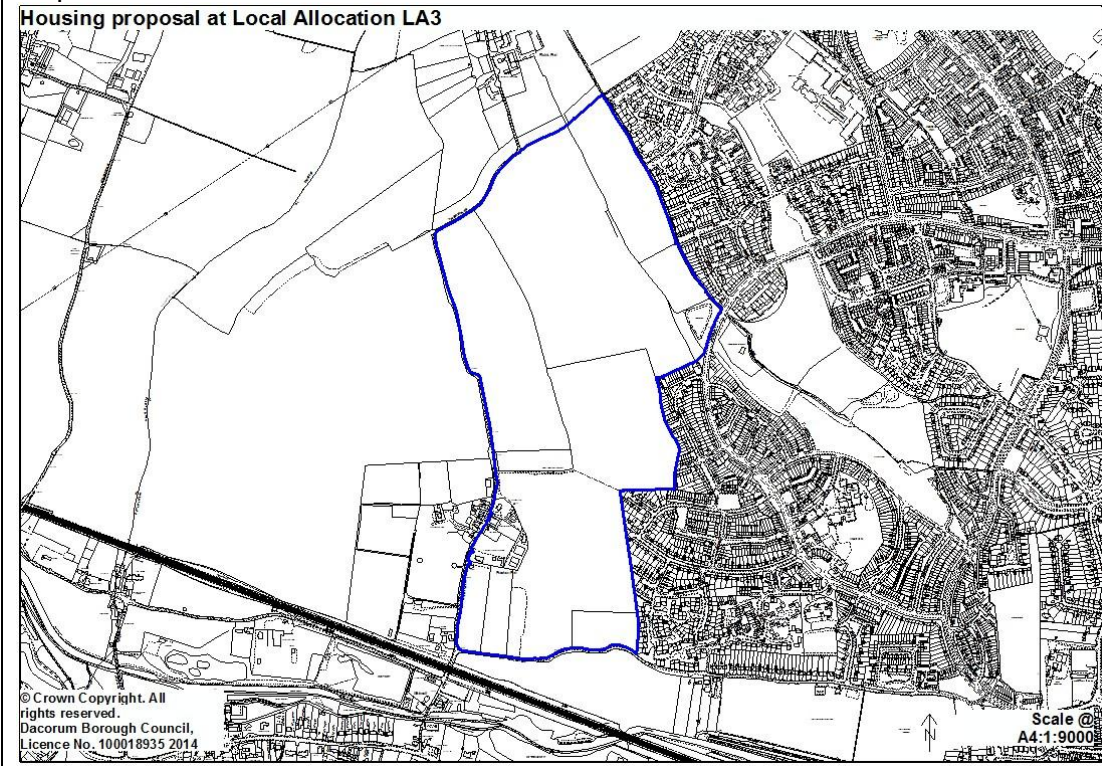
PROVIDING HOMES AND COMMUNITY SERVICES

- Page 63: H/6 39-41 Marlowes, Hemel Hempstead – delete designation and renumber all subsequent designations accordingly.
- Page 64: amend boundary of H/8 (new reference H/7 due to deletion of H/6 above) to exclude eastern portion of site (the latter to be added to MU/2 above) (shown below).
- Page 68: H/15 Former Police Station, r/o High Street / Kings Road, Berkhamsted – delete designation (replaced by MU/8).
- Page 68: H/16 Berkhamsted Civic Centre and land r/o/ High Street, Berkhamsted – delete designation (replaced by MU/9).
- Page 74: LA3 – remove Pouchen End hamlet from LA3 designation (shown below).
- Page 75: C/1 Extension to Tring Cemetery – amended boundary (shown below).
- Page 77: C/2 Amaravati Buddhist Monastery – amended boundary (shown below).
- Page 79: amend EZ/3 North-west Berkhamsted to show extension of the education zone to include Bridgewater School reserve site to North-west of Bridle Way (shown below).
- Page 81: L/3 Leisure space at LA5 – amended boundary to exclude gypsy and traveller site (shown below)
- Page 81: new proposal L/4 Dunsley Farm, Tring – new allocation for detached playing fields for Tring Secondary School (shown below).

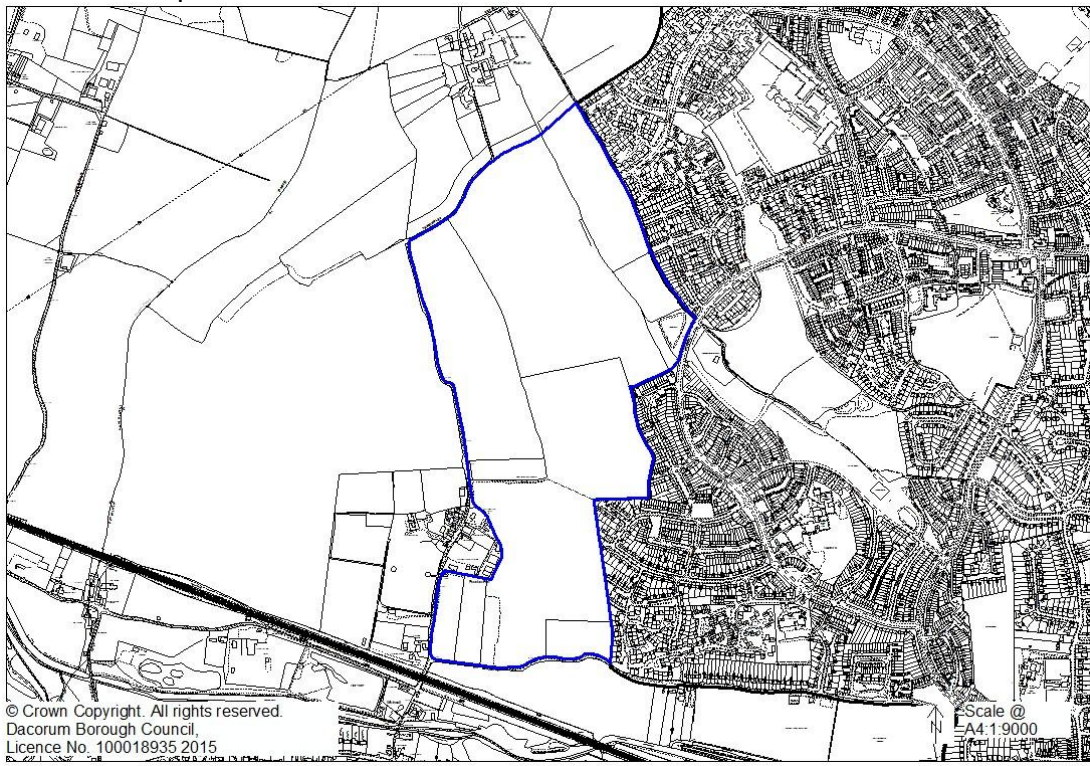
Housing Proposals

LA3 – remove the eastern part of the hamlet of Pouchen End from LA3 allocation
Note: Pouchen End remains part of the area proposed for removal from the Green Belt.

Map in current document:

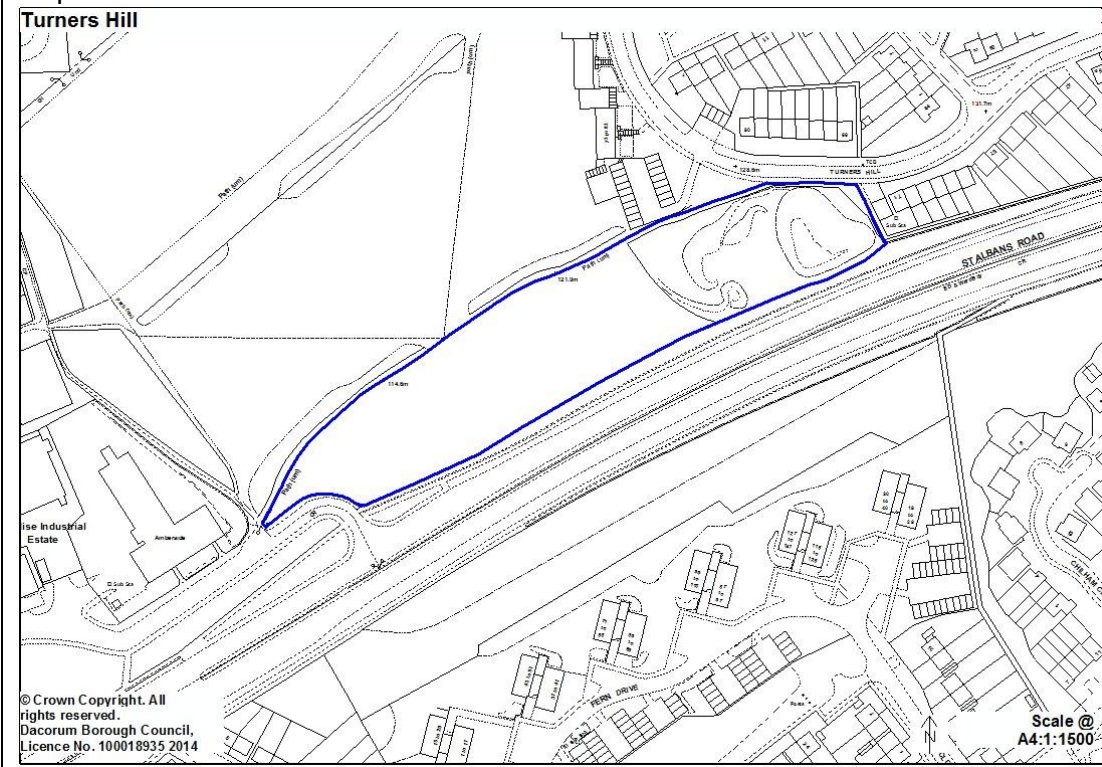


Amended map:

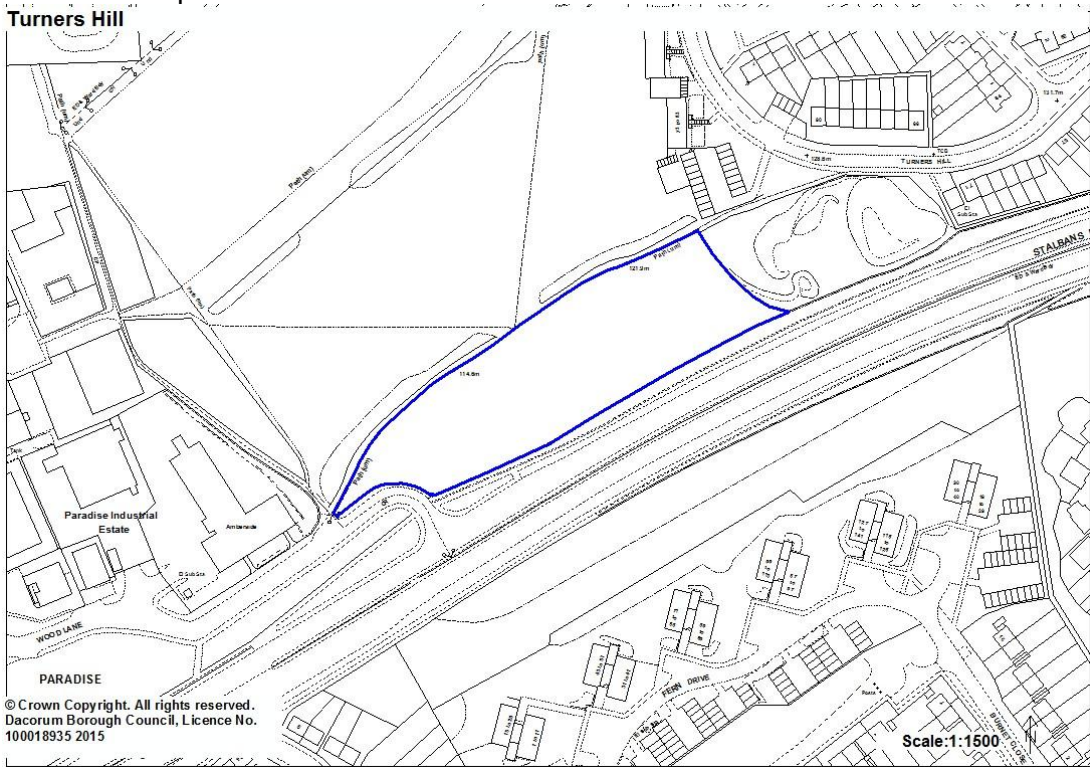


H/8: Land at Turner Hill, Hemel Hempstead – new reference H/7 due to deletion of proposal H/6 - amended boundary to exclude eastern portion of site (the latter to be added to MU/2 above)

Map in current document:



Amended map:



Note: All housing designations renumbered as follows (to reflect deletion of H/6, H/15 and H/16)

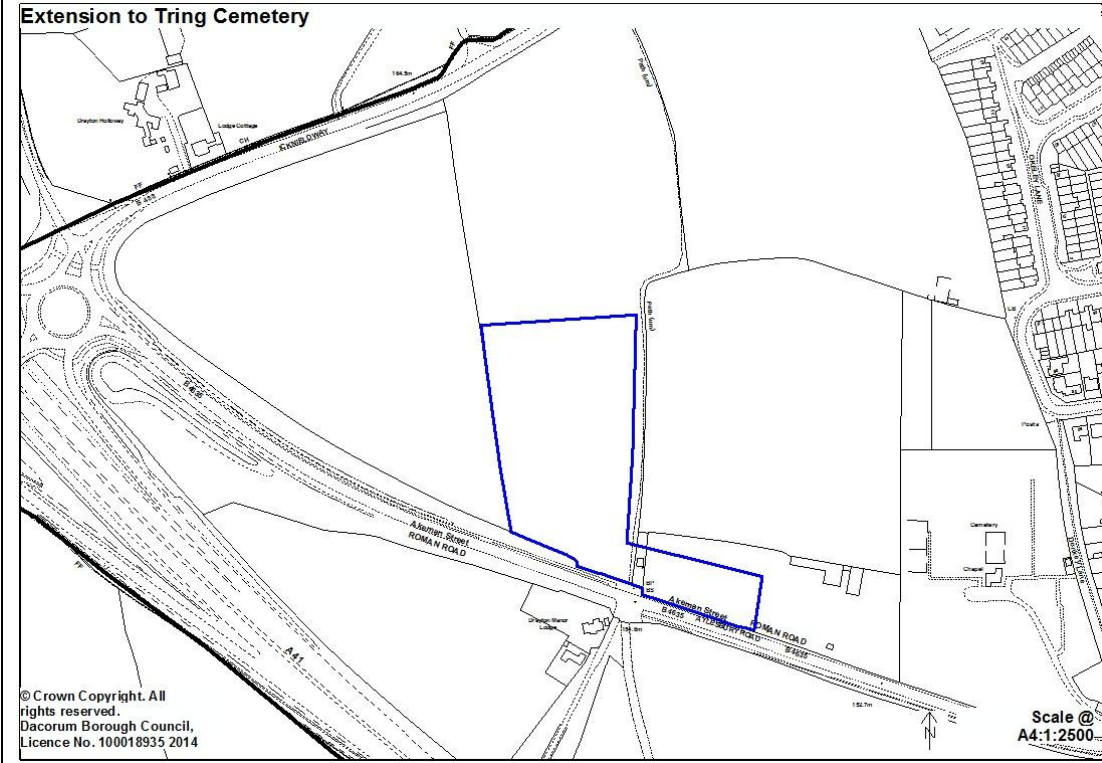
Old reference	New reference	Site
H/1	H/1	Land r/o 186-202 Belswains Road, Hemel Hempstead
H/2	H/2	National Grid and 339-353 London Road, Hemel Hempstead
H/3	H/3	Land at Westwick Farm, Pancake Lane, Hemel Hempstead
H/4	H/4	Ebbens Road, Hemel Hempstead
H/5	H/5	Former Hewden Hire site, Two Waters Road, Hemel Hempstead
H/6	DELETED	-
H/7	H/6	Leverstock Green Tennis Club, Grasmere Close, Hemel Hempstead
H/8	H/7	Land at Turners Hill, Hemel Hempstead
H/9	H/8	233 London Road, Hemel Hempstead
H/10	H/9	Apsley Paper Trail land, London Road, Hemel Hempstead
H/11	H/10	The Point (former petrol filling station), Two Waters Road, Hemel Hempstead
H/12	H/11	Land to r/o St Margarets Way / Datchworth Turn, Hemel Hempstead
H/13	H/12	Former Martindale School, Bosted Road, Hemel Hempstead
H/14	H/13	Frogmore Road, Hemel Hempstead
H/15	DELETED	-
H/16	DELETED	-
H/17	H/14	Corner of High Street, Swing Gate Lane, Berkhamsted
H/18	H/15	Miswell Lane, Tring
H/19	H/16	Western Road, Tring
H/20	H/17	Depot land, Langdon Street, Tring
H/21	H/18	Land adjacent to Coniston Road, Kings Langley
H/22	H/19	Corner of Hicks Road / High Street, Markyate
H/23	H/20	Watling Street (r/o Hicks Road / High Street), Markyate
H/24	H/21	Garden Scene Nursery, Chapel Croft, Chipperfield

Social and Community Facilities

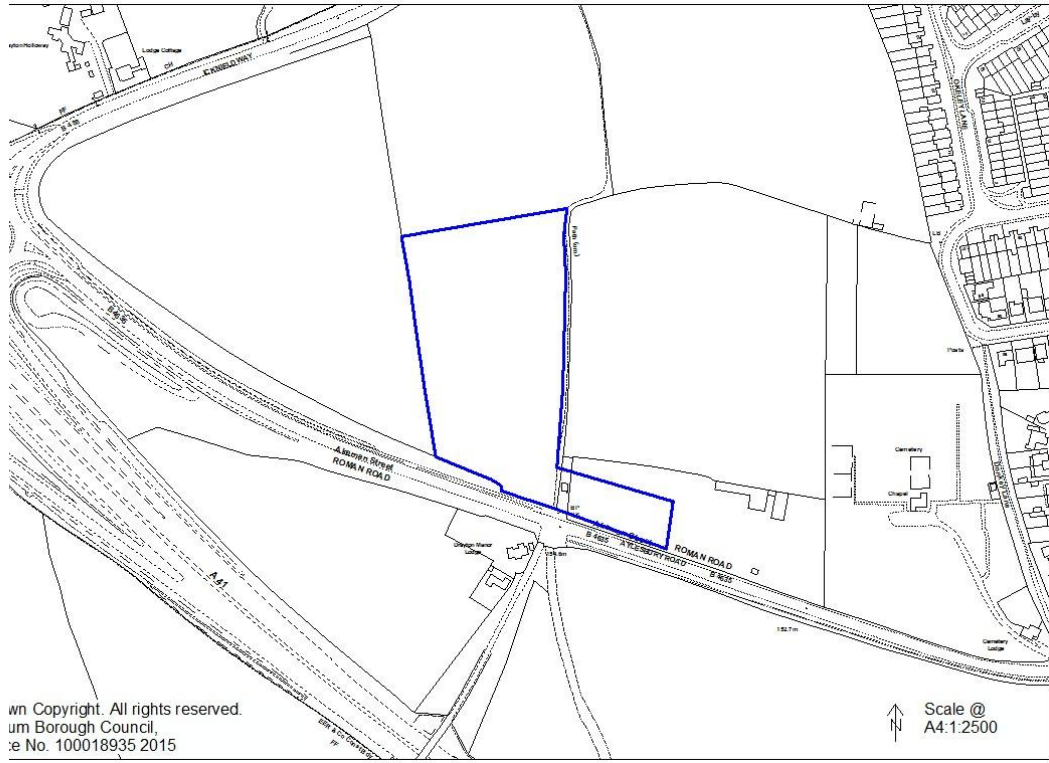
C/1 Extension to Tring Cemetery – amended boundary to correct alignment issue)

Map in current document:

Extension to Tring Cemetery



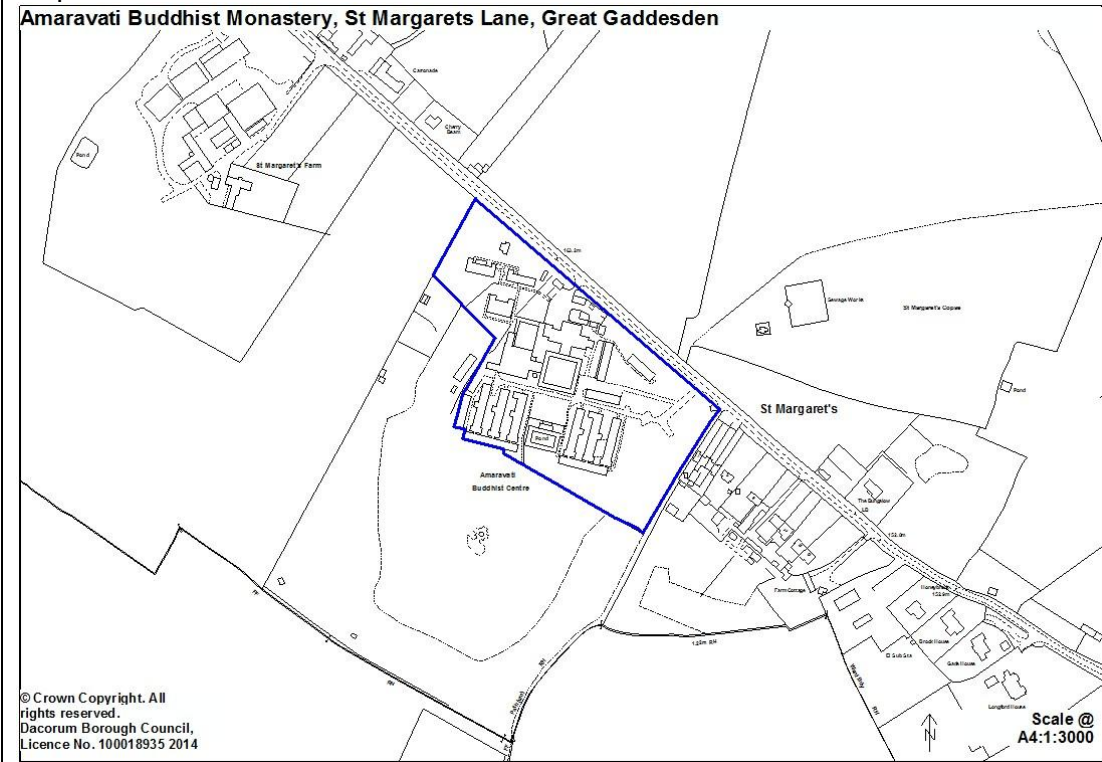
Amended map:



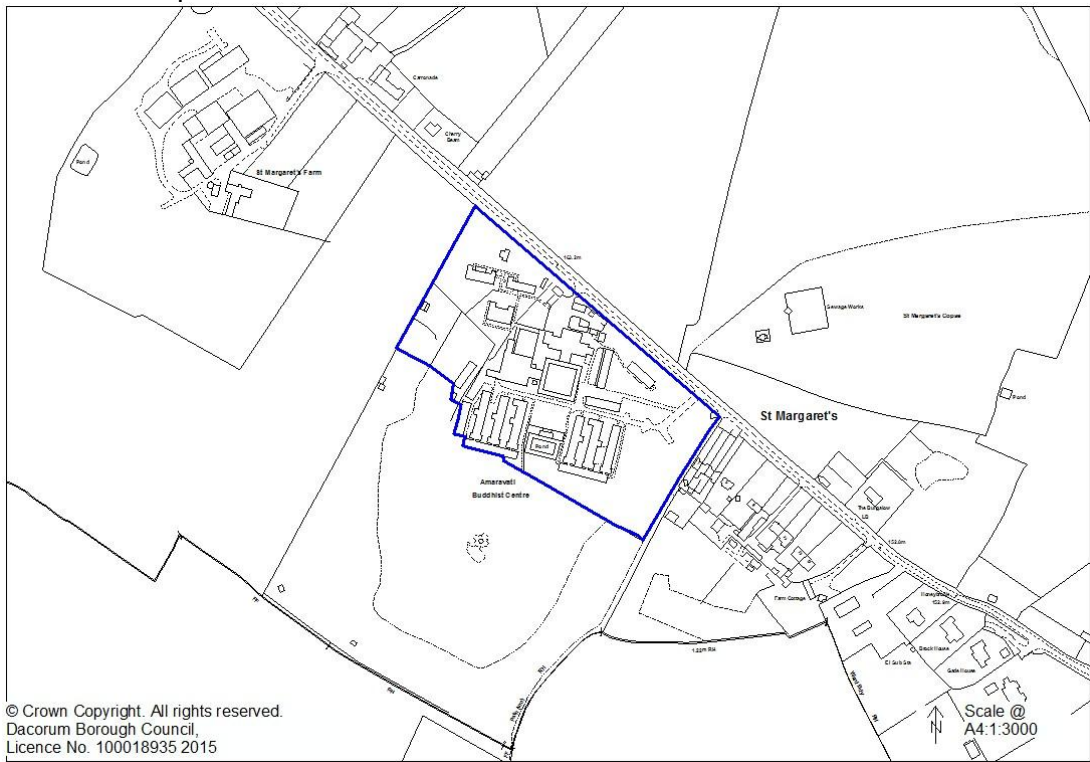
C/2 Amaravati Buddhist Monastery – amended boundary

Map in current document:

Amaravati Buddhist Monastery, St Margarets Lane, Great Gaddesden

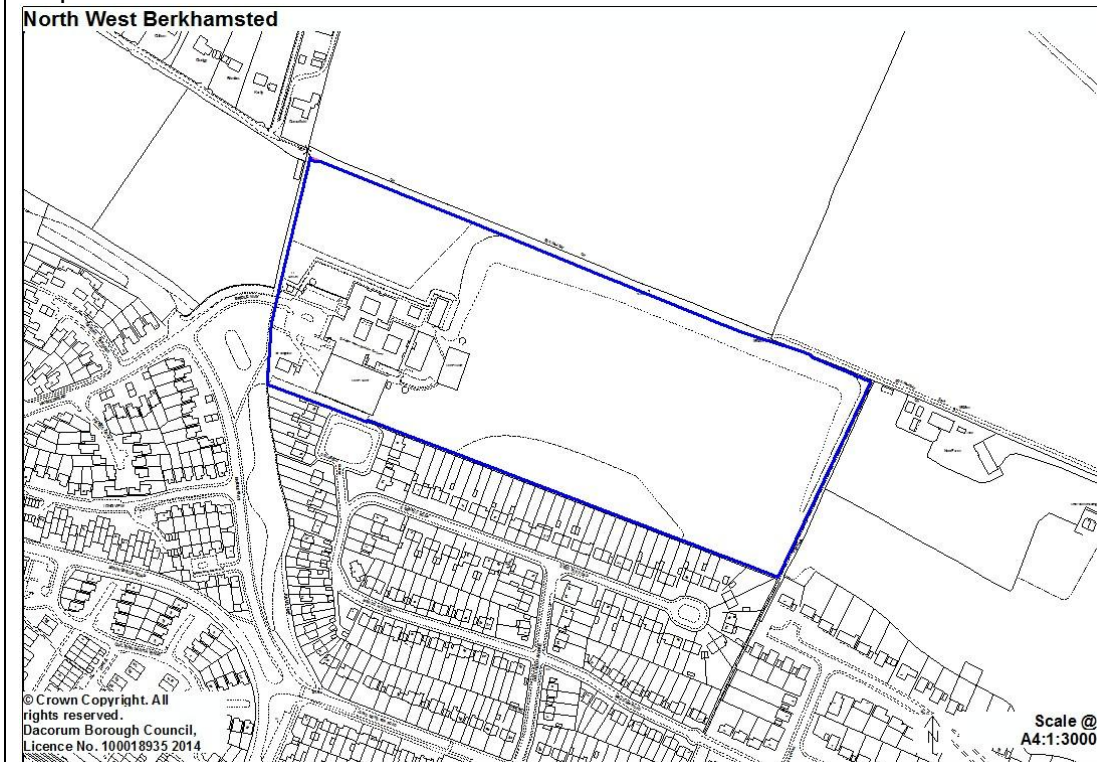


Amended map:

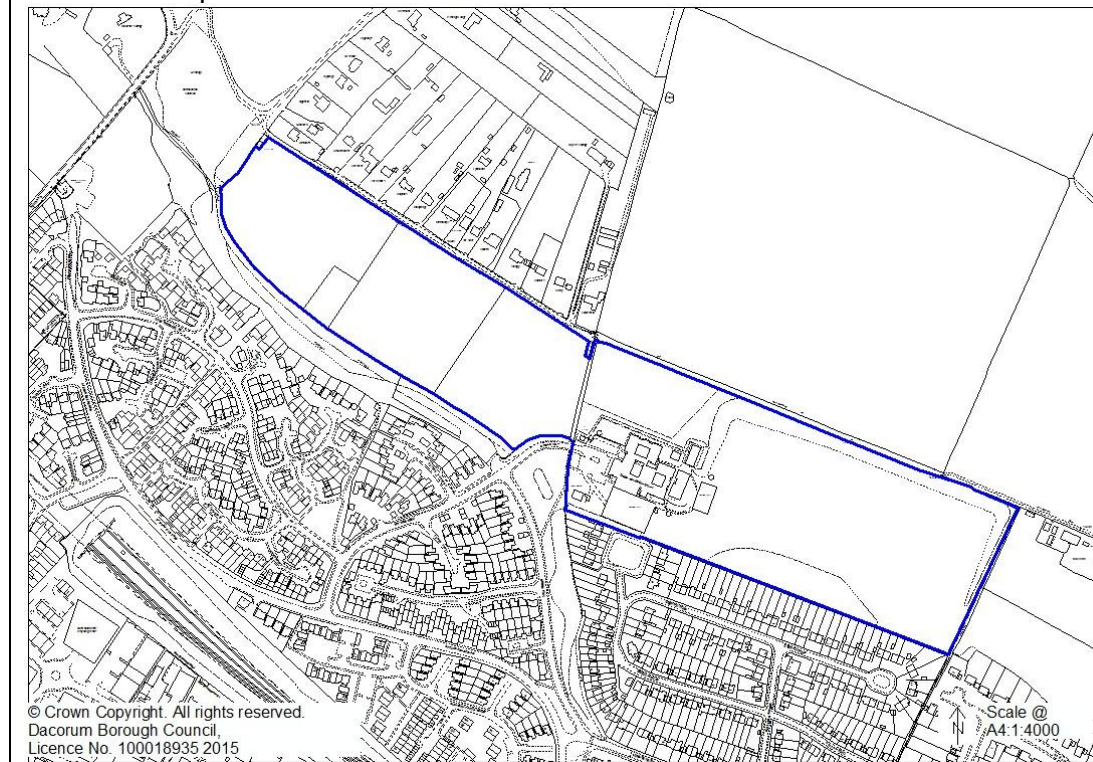


EZ/3 North-west Berkhamsted – correct extent of education zone

Map in current document:

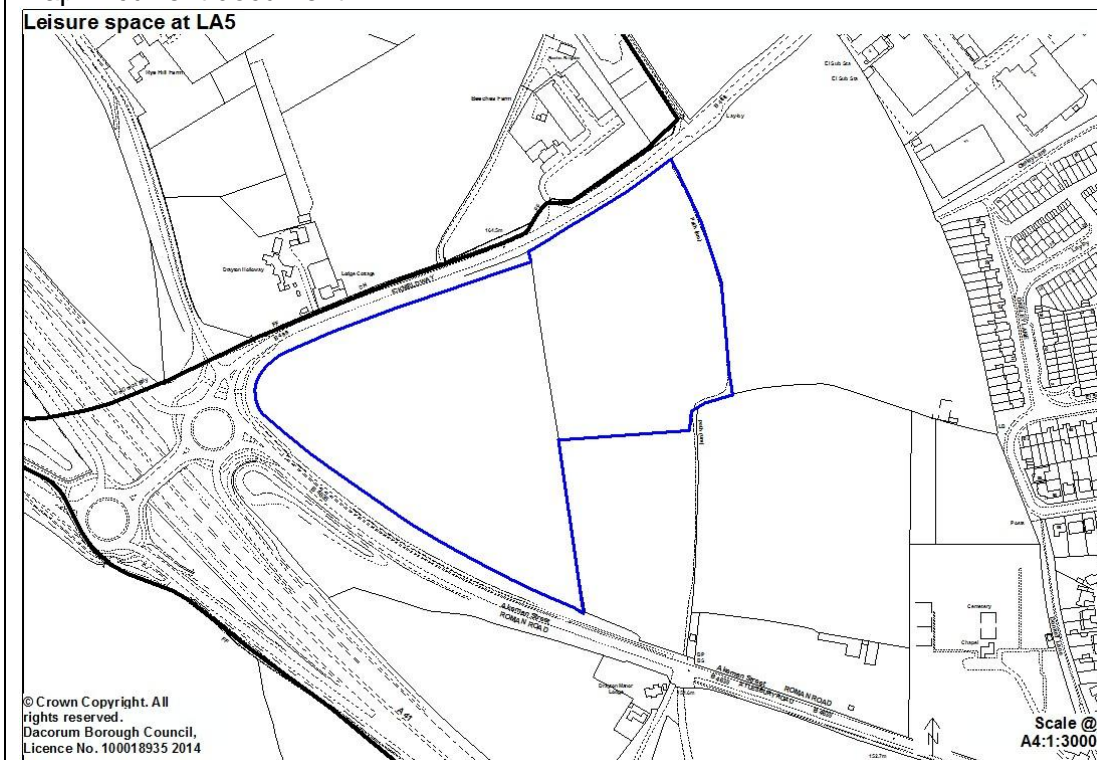


Amended map:

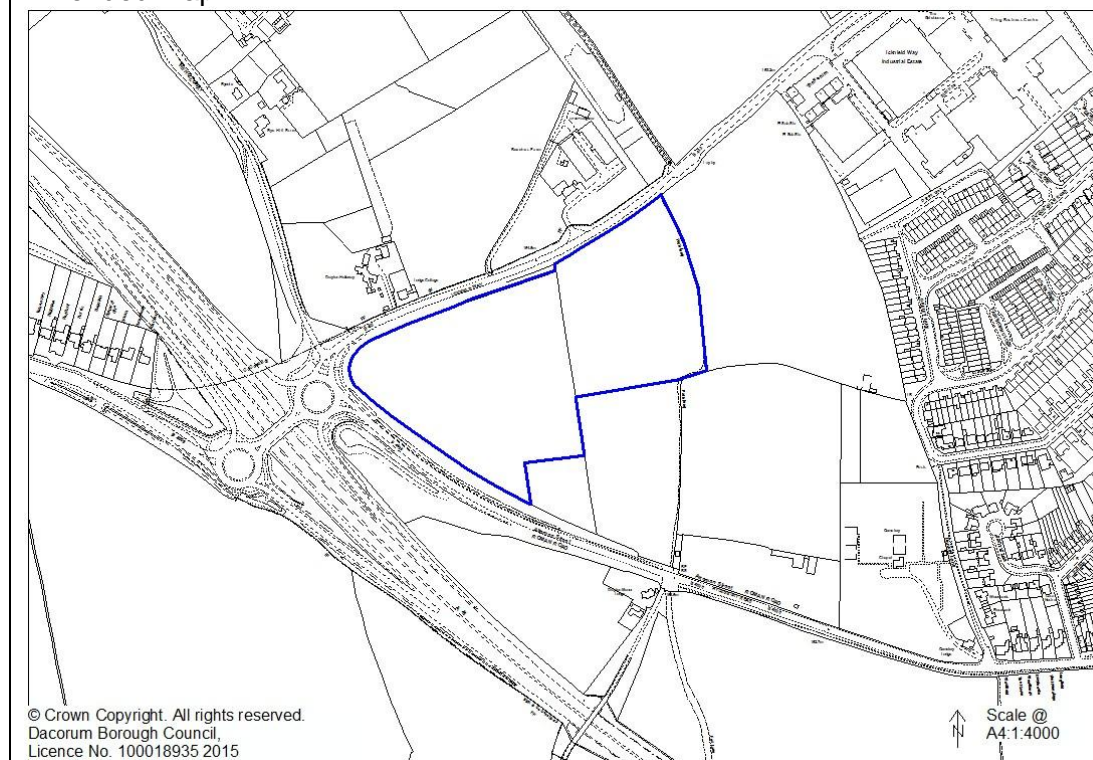


L/3 Leisure space at LA5 – amended boundary to exclude gypsy and traveller site

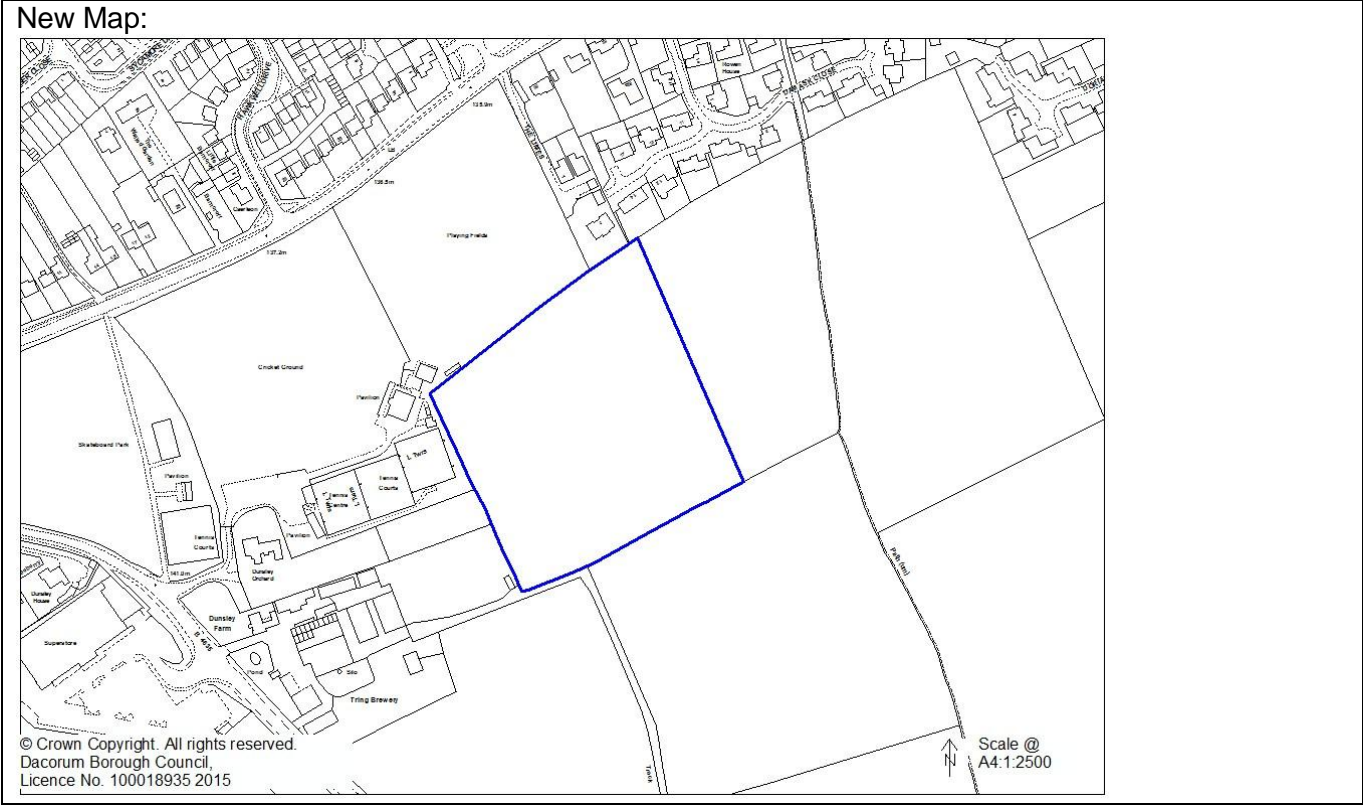
Map in current document:



Amended map:

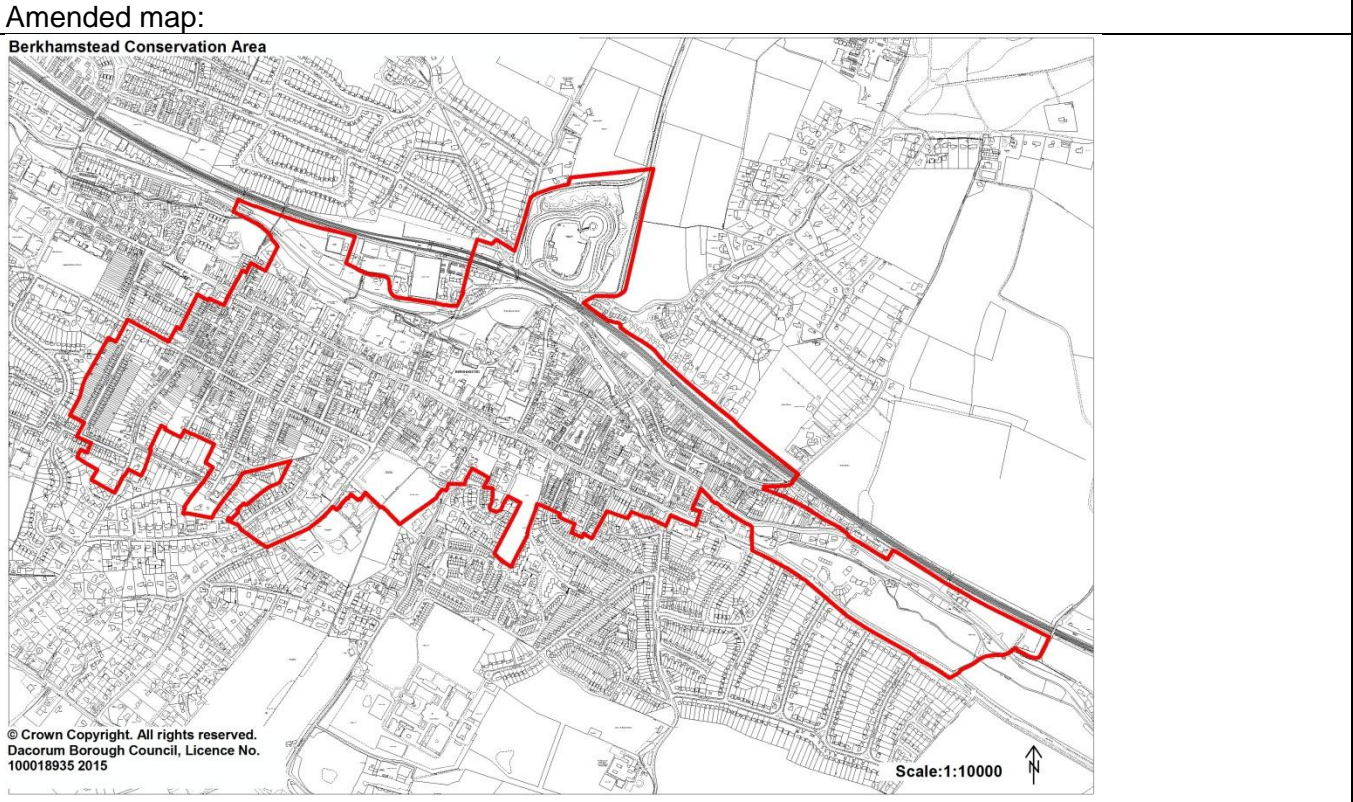
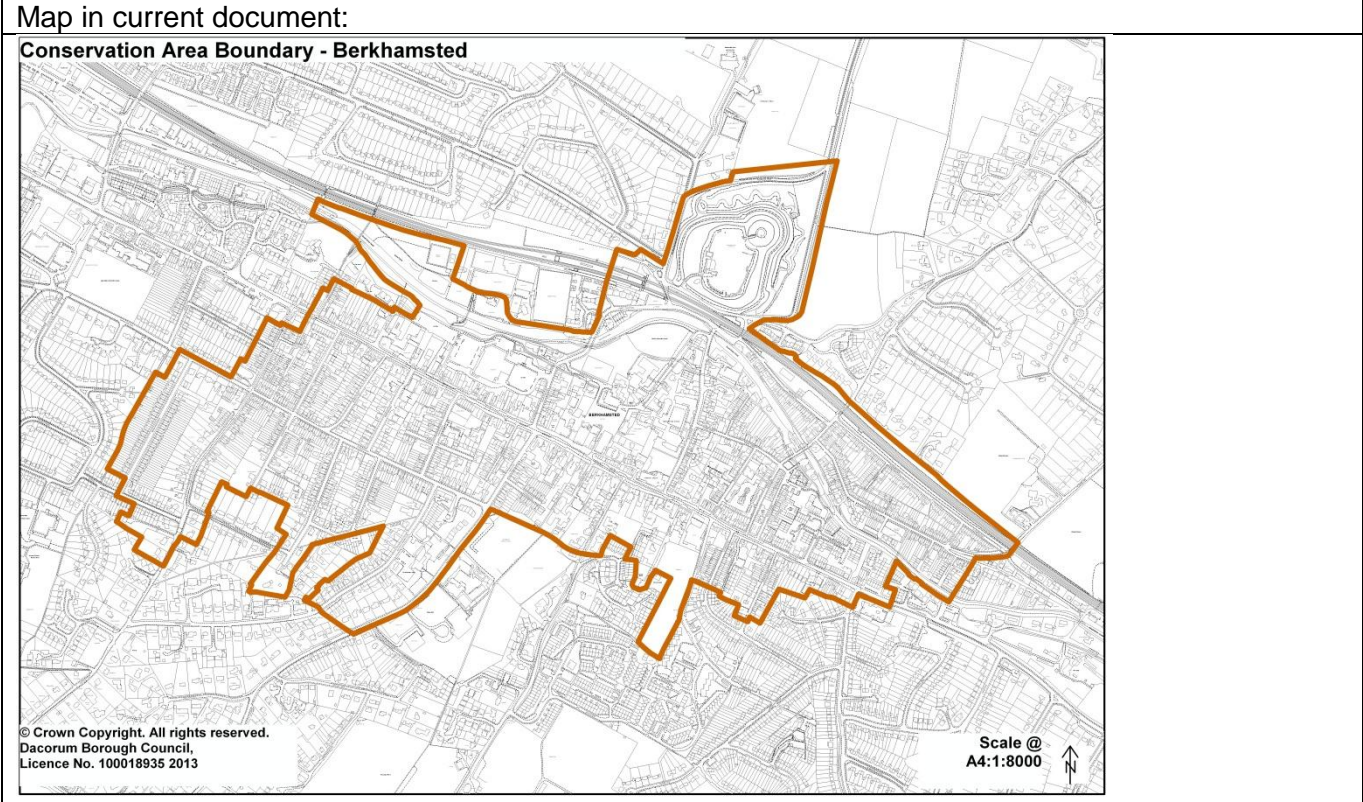


L/4 Dunsley Farm, Tring - new designation to provide detached playing fields for Tring Secondary School

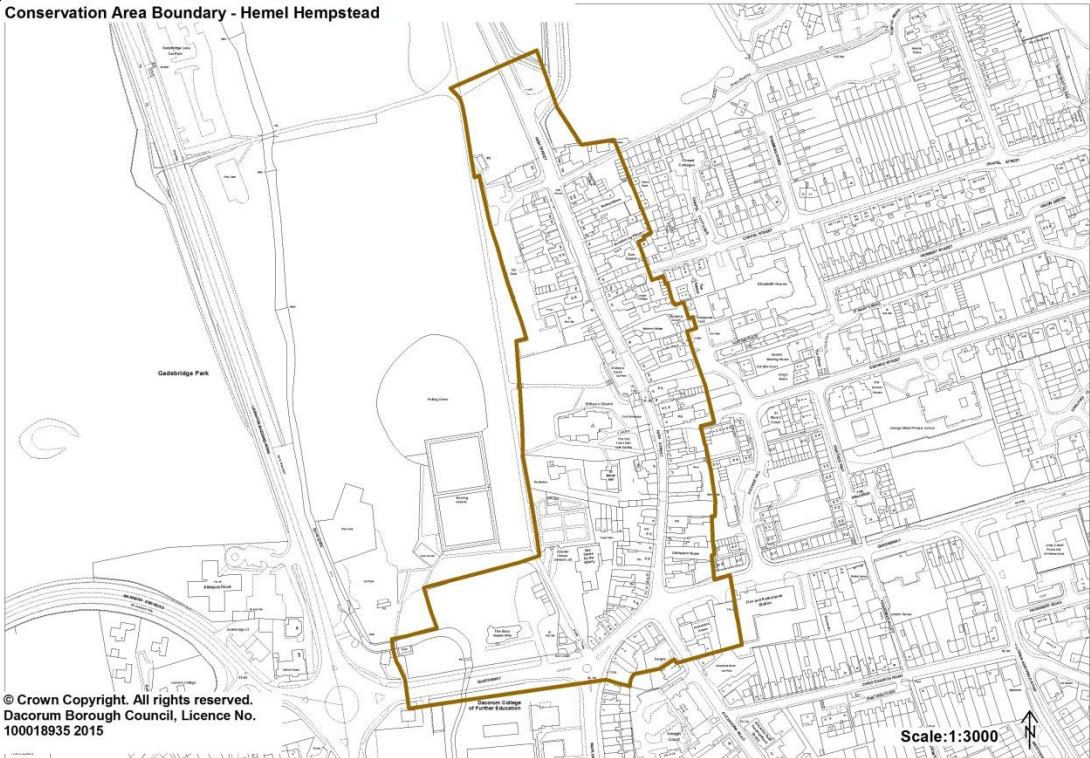
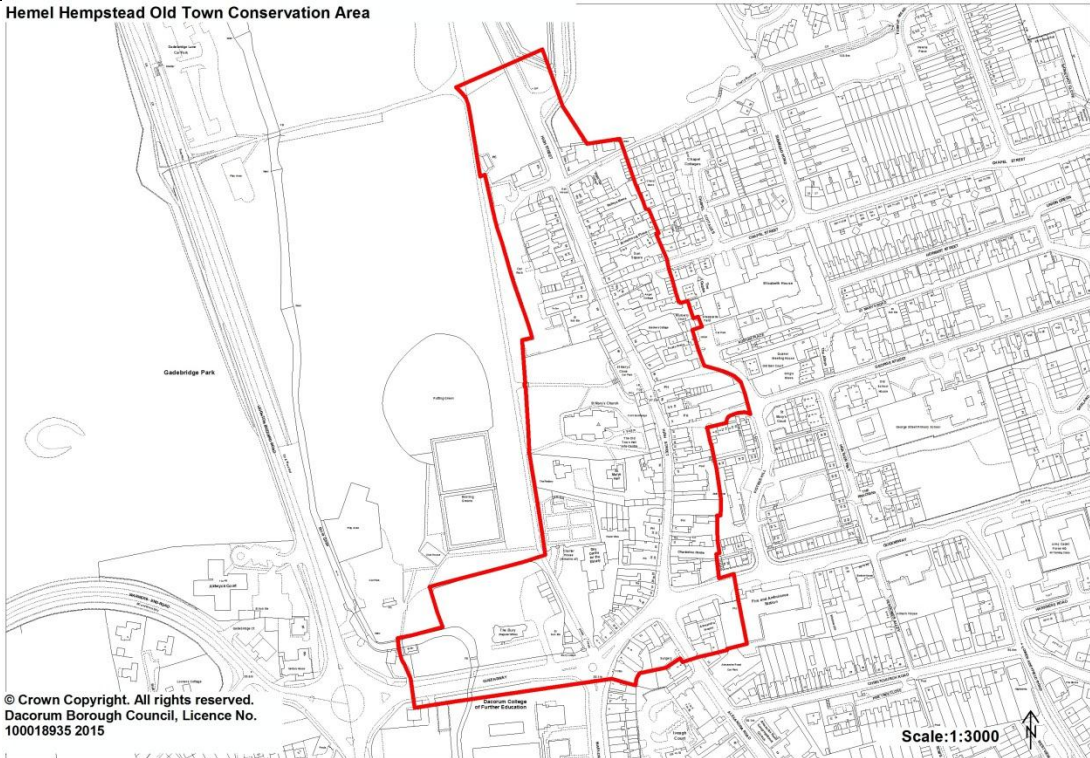


Conservation Boundary Changes

Berkhamsted Conservation Area - amended boundary



Hemel Hempstead Old Town Conservation Area - amended Boundary

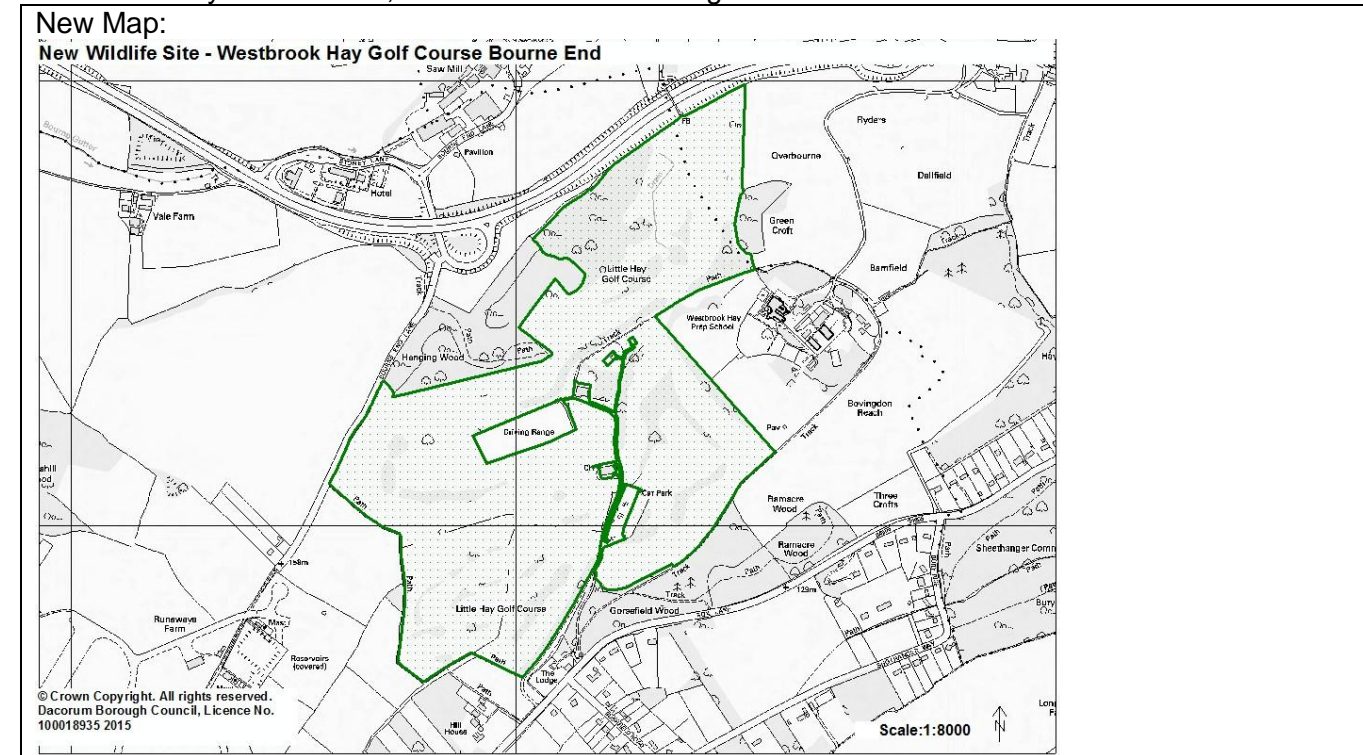
<p>Map in current document:</p> <p>Conservation Area Boundary - Hemel Hempstead</p>  <p>This map shows the current conservation area boundary of Hemel Hempstead Old Town, outlined in brown. The area is situated along the River Arun, with Gasbridge Park to the west. The map includes a scale bar indicating 1:3000 and a north arrow. Copyright information for Dacorum Borough Council is present in the bottom left corner.</p> <p>Scale: 1:3000</p>	<p>Amended map:</p> <p>Hemel Hempstead Old Town Conservation Area</p>  <p>This map shows the amended conservation area boundary of Hemel Hempstead Old Town, outlined in red. The area is situated along the River Arun, with Gasbridge Park to the west. The map includes a scale bar indicating 1:3000 and a north arrow. Copyright information for Dacorum Borough Council is present in the bottom left corner.</p> <p>Scale: 1:3000</p>
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LOOKING AFTER THE ENVIRONMENT

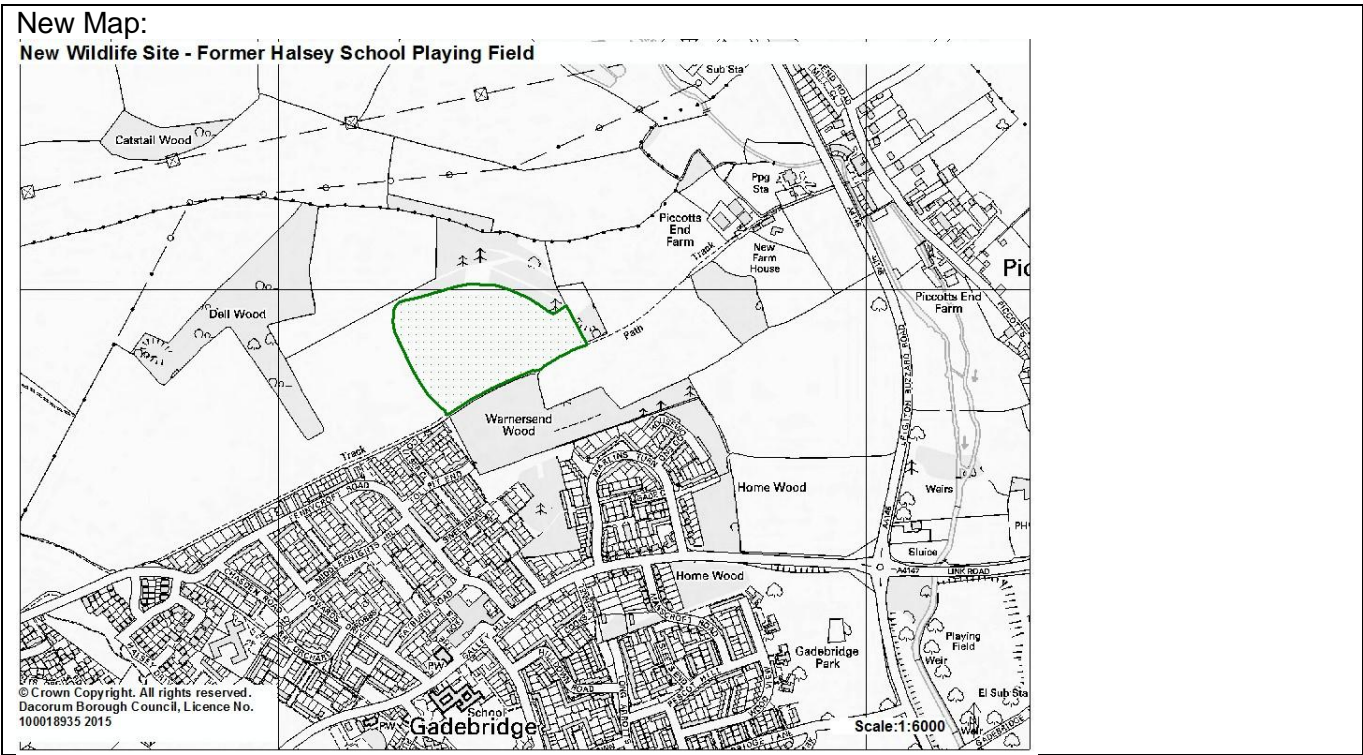
- Page 100-101: add two new wildlife sites – 1. Westbrook Hay Golf Course, Bourne End Golf Course and 2. Former Halsey School Playing Field (shown below).
- Page 116: amended boundary of Locally Designated Historic Park and Garden – Shendish Manor (shown below).
- Page 112: amend the boundary of the Policies Map to reflect changes to the Conservation Area for Hemel Hempstead Old Town (2 areas) (shown below).
- Page 112: amend the boundary of the Policies Map to reflect changes to the Conservation Area for Berkhamsted (4 areas) (shown below).

Wildlife Sites

Westbrook Hay Golf Course, Bourne End – new designation



Former Halsey School Playing Field – new designation



Locally Designated Historic Park and Garden
Shendish Manor – amended boundary

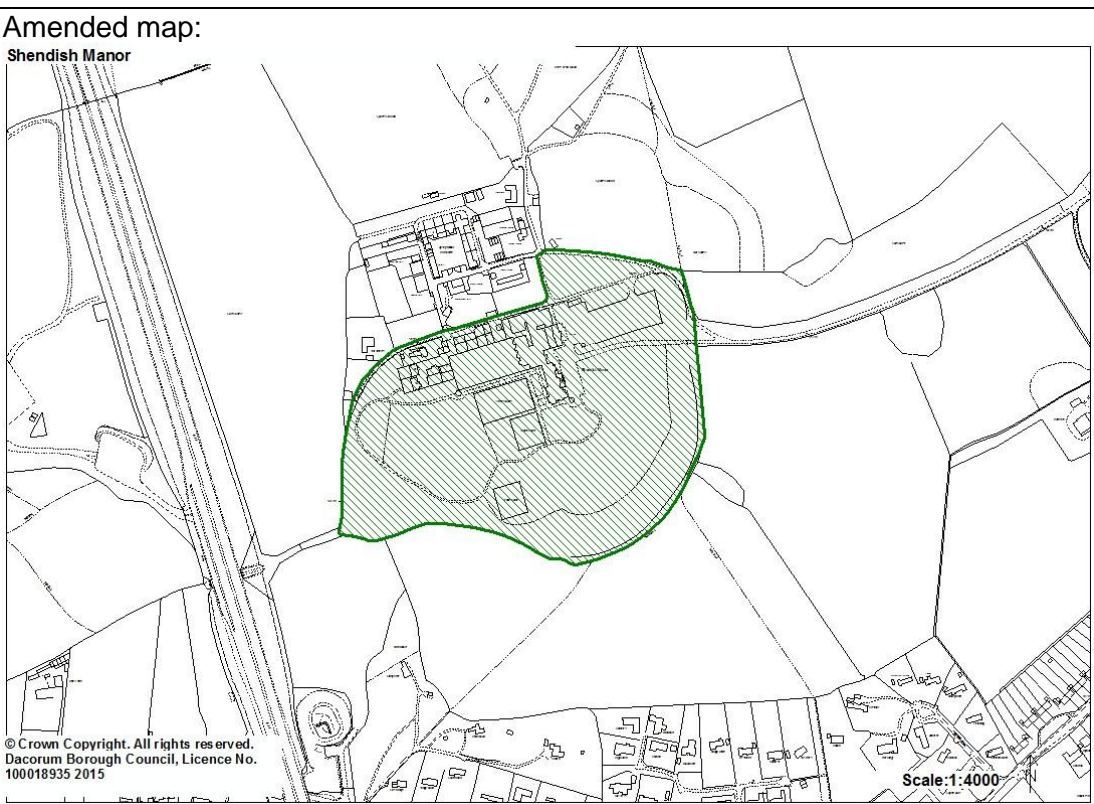
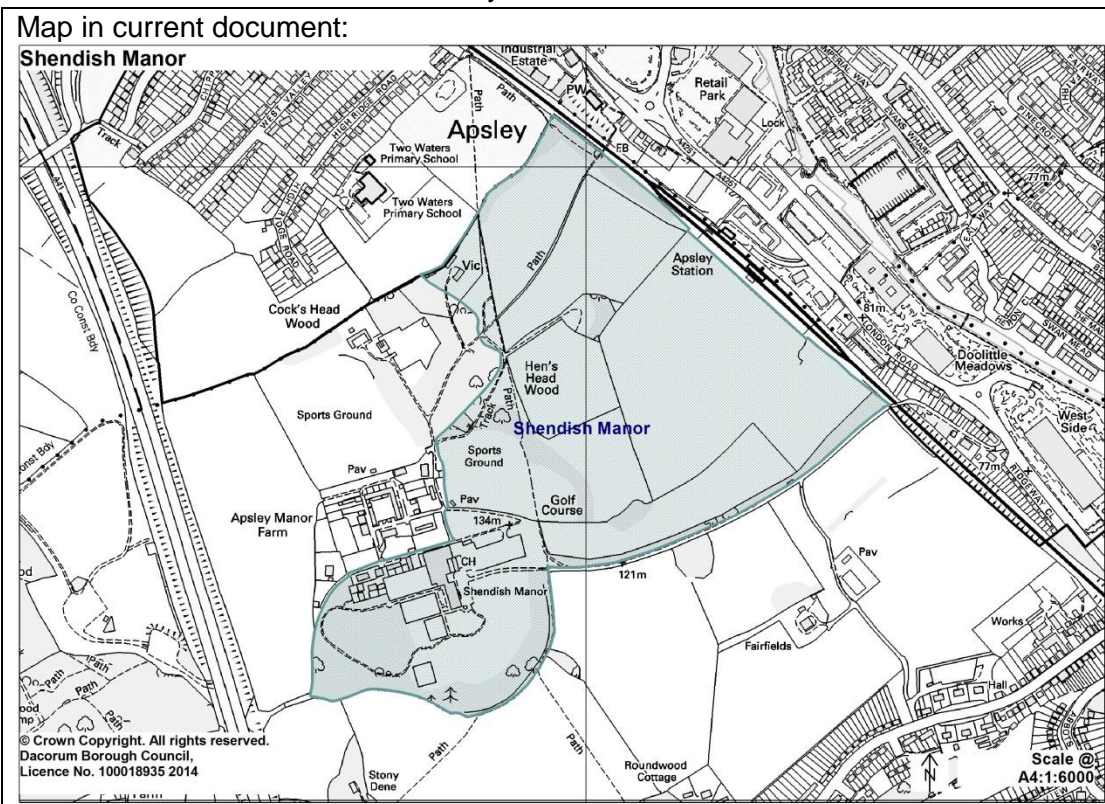


Table 5 – Responses not considered in the Report of Representations

(a) List of those making No Comment

- Mr Richard Sears, British Film Institute.
- Mrs Sheila Pilkington

(b) List of those making comments on the Sustainability Appraisal (incorporating Strategic Environmental Assessment)

- Natural England;
- Hertfordshire County Council Ecology Officer
- Boyer Planning on behalf of W. Lamb Ltd

Comments received are summarised below. The proposed response is set out in the SA/SEA Addendum Report

Natural England
We are pleased that the SA Report proposes mitigation measures/recommendations to enhance sustainability features of the DPD as well as proposing a monitoring framework for all significant sustainability issues identified during the assessment.
Table 4-1: Site Allocations SA Framework is generally supported. However, Objective 11 fails to recognise the Chilterns AONB, which covers a substantial area of the Borough, and the need to protect and enhance this.
The Sustainability Appraisal identifies that the HRA of the Core Strategy found no significant effects on Chiltern Beechwoods SAC from individual developments as a result of either air pollution or recreation disturbance. The assessment was updated to ensure there are no cumulative significant impacts on the SAC due to development proposed around Hemel Hempstead and the wider region. We understand that Natural England agreed with the conclusions of the HRA and the avoidance and mitigation proposed. The current SA report identifies that whilst the Site Allocations DPD provides a greater level of detail to the location of development to that which was included in the Core Strategy, it does not put forward any sites that are of a scale and/or location that will alter the findings of the previous HRA (of the Core Strategy). Based on our review of the current Site Allocations we are satisfied with this conclusion.
Hertfordshire County Council Ecology Officer
1. I acknowledge the recognition that impacts on biodiversity will be generally negative due to loss of open greenspace. However the impacts on recognised sites and other resources will be limited given the distribution of proposed sites, reducing the impact on more critical assets.
2. One aspect wholly unrecognised is the role of local food production and traditional land management which is essential in maintaining the better and other sites that remain within the wider countryside as well as statutory sites. The Planning system does not directly influence this, but nonetheless expects the results to be delivered. With nothing that even recognises this as an issue within the SEA, the potential for the net impacts of further development to degrade – or support – to these aspects and so their contribution to sustainability and impacts of the plan within the Borough, cannot be adequately considered, and so a major driver for, or impacting on, delivery is omitted from the assessment.
3. This is reflected within Table 3.1 of the Sustainability Assessment – biodiversity. Terms such as ‘create new’, ‘improve’, ‘compensate’, ‘protection’, ‘restoration’, ‘linking’ are all worthy but ALL require appropriate management to be delivered. The only opportunity outlined is using the LDF to promote the use of management agreements – which to date have been few and far between and largely ineffective in delivering any genuine biodiversity gain. There is nothing whatsoever that recognises or links farming and food production to this process – still by far the most important influence on land management and its quality in terms of wider land area.
4. I acknowledge the suggestion that unsustainable economic growth could adversely impact on biodiversity assets – but then this wouldn’t meet ‘sustainable development objectives anyway. I support the positive attributes to society that the environment can bring.
5. I support the concerns expressed regarding increase in light pollution and decrease of tranquillity; however there is no indication of who or how light pollution is to be monitored.
6. I support the aim to conserve landscapes in the borough; however, the same issue applies to that associated with biodiversity – how, when so much of this is dependent upon appropriate land management, which is declining?
7. I acknowledge and support the issues raised for soil and water.
8. I support the issues raised within Table 4-1 Site Allocations SA Framework, in respect of Biodiversity and Water. Criteria and questions are well considered. However, the issue of existing water over-abstraction and the

requirement for further development has not been raised. This is perhaps one of the most obvious environmental sustainability issues.
9. I am unclear as to how the development west of the Icknield Way (LA5) can be considered as Sustainable in contributing to the SA re biodiversity when half of the existing open land will be developed – as subsequently outlined in 6.4.3 and 6.6.6 which identifies a negative impact on biodiversity. This should be neutral at best given the loss of such open farmland and any associated biodiversity although without any obvious or significant known ecological interest. Ecological management of the cemetery is currently only a suggestion and may not be achieved in practice.
10. 6.6.2. Policy LA1 Marchmont Farm. I acknowledge that Open space will link Margaret Lloyd Park, Howe Grove and the wider area, but of course these are already linked; the proposals to retain connections are very much damage limitation.
11. 6.6.4 Policy LA3 West Hemel Hempstead – providing ‘a coherent, and wildlife friendly open space network (including an extension to the Shrub Hill Common Nature Reserve)’ is essential, not only to mitigate the loss of open habitats but also to maintain a robust and functional link to the LNR. The most obvious existing corridor link along the Green Lane is not recognised in this respect.
12. 6.6.5: Policy LA4 suggests mitigation to benefit biodiversity. Whilst this is true, it will not compensate for the loss of a locally significant area of previously unidentified Wildlife Site quality grassland. This must be compensated for in some way for any sustainability criteria to be met. The Sustainability Appraisal currently does not recognise the full extent of this impact.
13. 6.6.7. Policy LA6 does mention the impact on the existing local wildlife corridor.
14. 6.6.9 Proposal H/1 does highlight loss of gardens; there will also be a significant potential impact on protected species which will represent a serious issue should they continue to survive in this area.
15. 6.6.16 Proposal H/8 This would result in significant loss of open grassland of local biodiversity value, adjacent to what may survive of Paradise Fields and severing a good link with the woodland area to the east. This is a significant loss locally – not fully recognised by the SA. The use of the adjacent Wildlife Site for similar recreational purposes further demonstrates the failure to fully reflect the impacts of this loss- not only a net loss but increased degradation of the adjacent Wildlife Site. This is perhaps one of the most damaging impacts of the plan and should be stated thus.
16. 6.8.1 Assessment by Topic – Biodiversity. Whilst negative impacts on biodiversity are recognised, I consider this rather under-estimates this impact on biodiversity, although it is also correct in stating the relative significance of this is partly dependent upon the importance of the ecological resources affected. Furthermore the cumulative impact is reduced given the widespread location of the sites, all greenfield or open land development will inevitably have a direct impact on the areas affected. However for the larger proposals this will affect biodiversity associated with arable farmland and horse paddocks. These will all result in a net loss of biodiversity resource, however much improved management elsewhere may attempt to compensate. This should be more clearly recognised as a context for the Assessment. Furthermore, all such development will also bring with it increased pressure on adjacent land or sites from loss of open space, associated habitats and disturbance of the sites themselves from increased visitor usage of a variety of forms. This has also not been effectively considered. Of particular concern are the impacts on existing or potential Wildlife Corridors; these will invariably be small and likely to be poorly managed, and increasingly degraded in themselves. Where important sites are affected – such as Shrub Hill common – I am not convinced the proposals have effectively secured appropriate compensation and /or mitigation. Consequently there needs to be outlined the need for positive management resulting from the development process to help address this – otherwise the quality of sites affected is likely to degrade.
16. 6.8.2 Water, soil etc... Where sites are located adjacent to watercourses, the location is equally vulnerable in the manner described above. However any improvements in water quality should also lead to improvements in biodiversity if other riverine management is appropriate.
Consequently I do not consider this assessment to be fully comprehensive or robust without at least recognising these aspects and considering opportunities to support such management where appropriate.
Boyer Planning on behalf of W.Lamb Ltd
<p>Extract from representation that refers to the SA.</p> <p>2.15 Furthermore, the Table 6-1 on page 30 of the Sustainability Appraisal of the Pre Submission DPD appears to have considered policy SA1 purely from the perspective that the role of this policy is to allocate sites for development. This is further emphasised through paragraph 6.3.1 which states that, ‘This policy has been assessed as having positive effects against some economic and social objectives. The policy aims to develop and redevelop sites that will be used to provide local facilities for local communities, increasing equality and reducing social exclusion....’</p> <p>2.16 It has not made any account of its apparent role to be relevant for all sites covered by a designation.</p> <p>2.17 Additionally, in terms of alternatives considered, there does not appear to be any consideration given to protecting the established trees through a group tree preservation order. The Sustainability Appraisal should be amended to take into account this alternative and ensure it is robust to minimise the potential for legal challenge to the Local Plan process.</p>