



Issues and Options Consultation Report of Responses Local Plan to 2036

September 2019

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DBC Issues and Options Consultation 2017 – report of consultation

1. Introduction: Issues and Options Consultation

- 1.1 The Issues and Options consultation was the first formal stage of the Dacorum Borough Council Local Plan Review process. The Plan will cover the period 2018 to 2036 and replace and roll forward the Saved Policies in the Dacorum Local Plan 1991-2011, the Core Strategy 2006-2031 and the Site Allocations DPD 2006-2031 to create a single Local Plan.
- 1.2 This stage of the process set out to gain to gather stakeholder views and opinion on high level principles and issues on;
- Key issues of particular concern in Dacorum today
 - The matters most likely to grow in importance over the next 20 years
 - Options for addressing key issues and providing for future needs
- 1.3 The public consultation on the Issues and Options took place over a period of 6 weeks from 1st November 2017 to 13th December 2017
- 1.4 The full Issues and options consultation document can be found here:

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-plan---issues-and-options---consultation-final---13-november-2017.pdf?sfvrsn=21>

2. Making Representations

- 2.1 Feedback on the Issues and Options document was invited in a range of formats:
- Our consultation portal hosted the Issues & Option Document which set out each of the questions within each relevant section. Access to the consultation was via a hyperlink on the DBC Current Consultation web-page and the link was also provided in the notification emails as a link and on the postal notifications and the Public Notices printed in the Gazette & St Albans Review newspapers. The main document on the portal provided the option of answering yes or no to the questions with the opportunity to provide detailed comments on every question and supplement the response with additional evidence.

- A downloadable version of the questionnaire which could be completed and returned electronically or printed and returned by mail or e-mail. <http://www.dacorum.gov.uk/docs/default-source/strategic-planning/local-plan-issues-amp-options-consultation-questionnaire.pdf?status=Temp&sfvrsn=0.44252277522892447>
- By e-mail
- By letter
- Written comments could also be submitted at any of the public exhibitions

3 Publicity

- 3.1 The Issues and Options Consultation was carried out in accordance with the minimum requirements set out in the Council's adopted SCI.
- 3.2 Advance publication of the forthcoming public consultation was included in both the quarterly printed and monthly electronic versions of Dacorum Digest; the Council's primary documents for communicating with local residents and businesses.
- 3.3 The six week consultation was advertised in the local press on 1st November 2017 and was subject to additional media coverage online and in print.
- 3.4 Posters and leaflets were sent to all town and parish councils, libraries in Dacorum to give local publicity to the consultation and associated public exhibitions.
- 3.5 Full details of the publicity can be found in Appendices 2 & 3 to this document

4. Notification

- 4.1 The Issues and Options notification was carried out in accordance with the minimum requirements set out in the Council's adopted SCI.
- 4.2 The Council sent e-mail or postal notifications of the consultation on Issues and Options to all Town and Parish councils in Dacorum along with neighbouring Town and parish Councils, county and District/Borough Councils. All Dacorum Council's elected members were informed of the consultation.
- 4.3 Statutory consultees were also notified of the consultation by email or post. Everyone (including, but not limited to, individuals, businesses, interest groups

and resident organisations) recorded on the Council's database as having an interest in the local plan were notified of the consultation by e-mail or by direct mail where no e-mail address was recorded.

4.4 Full details of the notification can be found in Appendix 2 to this document

5. Public exhibitions

5.1 Six public exhibitions were held at venues across the Borough at open venues. The exhibitions ran through the afternoon into the evening to maximise the opportunity for people to attend and view the information presented. The exhibitions were designed to allow people to drop-in and read more about the Issues and Options consultation in particular and the wider local plan review Process. All events were attended by multiple Council officer with a knowledge and understanding of the Issues and Options document to help visitors understand the purpose and content of the exhibitions and answer any questions that the visitors may have.

5.2 Printed display boards were shown at each venue. There were a number of general boards that set out background information and gave a concise summary of the Issues and Options consultation which were augmented at each venue by supplementary boards at each venue that contained information to that locality including details of significant sites being promoted for development. The boards were also available on the Council's website in addition to the other information detailed in this statement. The boards can be found here:

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-exhibition-boards-1-5.pdf?status=Temp&sfvrsn=0.06019253006375991>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/dacorum-local-plan-exhibition-boards-6-10.pdf?status=Temp&sfvrsn=0.7230881911939337>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/site-options-berkhamsted-board.pdf?status=Temp&sfvrsn=0.48714384860208293>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/site-options-berkhamsted-maps.pdf?status=Temp&sfvrsn=0.5255691571496605>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/bovingdon-site-options---board.pdf?status=Temp&sfvrsn=0.21803663471269496>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/hemel-hempstead-site-options---board.pdf?status=Temp&sfvrsn=0.13700779503091392>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/hemel-hempstead-site-options---maps.pdf?status=Temp&sfvrsn=0.9626831728785077>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/kings-langley-site-options---board-9.pdf?status=Temp&sfvrsn=0.6369382589736252>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/markyate-site-options---board.pdf?status=Temp&sfvrsn=0.10175680328153297>

<http://www.dacorum.gov.uk/docs/default-source/strategic-planning/tring-site-options--board-9.pdf?status=Temp&sfvrsn=0.6096018847866148>

6. Overview of Responses

Level of Response

- 6.1 The Issues and Options document contained 46 questions, there were a total of 22,708 responses from 2,376 consultees, (one response was inadmissible on grounds of racism).

Method of Response,

- 6.2 Responses were made direct by some consultees into our consultation portal, others were received as letters, or completed questionnaires in the post, or email, or postcards.

What you told us

High Level Overview

- 6.3 As explained above the consultation exercise attracted a large number of individual responses. The detailed responses are summarised and discussed and in the appendices.

It is possible to identify some high level themes emerging, particularly specialist technical consultees and Town/Parish Councils, which have been set out below. It is important to note that the following section does not in any way indicate a ranking of issues. Furthermore, if an issues is not listed below it should not be interpreted that the Council has dismissed it from consideration.

Theme:

Concern that the Council has not fully assessed urban capacity and made decisions about underused spaces throughout its towns, including Hemel Hempstead.

Officer Comment:

The Urban Capacity Study will review the potential for new development to be accommodated within existing settlements. The output of this work will include identifying sites for development and an allowance for unallocated sites coming forward during the plan period.

Officers will look carefully at development opportunities within the urban area in order to minimise the requirement for greenfield development, in accordance with national planning policy. The approach will however balance other priorities of the development strategy, such as the Council's economic, infrastructure and urban design objectives.

Theme:

Comments were raised around the approach to development in the Green Belt and the approach to be taken to assess future development sites. It was felt that a further assessment would be required on Green Belt sites before identifying preferred options

Officer Comment:

The selection of sites (both those within the existing urban area and any greenfield sites required) will be subject to further assessment, taking into account a range of factors and informed by the spatial development strategy being developed by the Council. This may include, inter alia, further refinement of the Green Belt Review evidence a further assessment of landscape and visual impacts and a review of settlement character.

Theme:

The protection of ecological assets (green infrastructure, corridors, biodiversity areas, wildlife and chalk streams- water abstraction) should be given great weight and priority in the plan

Officer Comment:

Officers will ensure that the Local Plan protects and enhances the natural environment with particular focus on developing a holistic approach to green and blue infrastructure and climate change.

An approach to green infrastructure will be developed and further understanding of the water environment will be developed to inform policies. The Council will also look to develop policies around biodiversity.

Site selection will be informed by a Strategic Flood Risk Assessment to ensure there is no increase in flood risk off site and any on site risks are mitigated.

The Local Plan will also be subject to Sustainability Appraisal and Strategic Environmental Assessment where necessary mitigation will be identified.

Theme:

Chilterns AONB conservation is an important consideration as this is a nationally recognised area afforded special protection, including protection of its setting.

Officer Comment:

The Council fully recognises the very special nature of the Chilterns AONB and its value locally and nationally and will ensure the Local Plan recognises this.

The Local Plan will look to the guidance contained in the existing Management Plan when preparing the plan. In addition the Plan will contain both strategic and detailed policies covering the AONB.

Wider issues related the AONB such as biodiversity, landscape impacts water and air quality will also be addressed through the wider strategic and DM policies and considered through the Strategic Environmental Assessment process.

Theme:

Chilterns Conservation Board have concerns over the extent to which the proposed allocations have been considered from a landscape and visual impact perspective. Greater reference to the AONB Management Plan needed. Chilterns Conservation Board object to aspects of the Plan until further assessment of the impact on the AONB is known.

Officer Comment:

The Council fully recognises the very special nature of the Chilterns AONB and its value locally and nationally and will ensure the Local Plan reflects this.

Further work will be undertaken to assess the impact of the policies and proposals within the Plan on the AONB and the Council will look to minimise these as far as is possible.

Theme:

Concerns over the extent to which infrastructure assessments have fed into the Plan. Of particular importance is the need for schools and healthcare facilities. It was identified that school provision is particularly important for Berkhamsted and Tring.

Officer Comment:

The Council places great weight on securing necessary infrastructure to support new development in the Borough.

The Local Plan will be supported by the Infrastructure Delivery Plan setting out the infrastructure required to support development. This will be developed in close consultation with infrastructure providers and others responsible for infrastructure delivery and/or commissioning.

The information in the IDP will be used to identify the potential needs arising from the Plan as a whole and individual sites and the requirements will be addressed through strategic policies, detailed policies and site allocation policies.

The impact of infrastructure requirements on the delivery of development will be tested through a plan wide viability assessment and assessment of individual strategic sites. Infrastructure delivery/requirements will be reviewed in the light of the viability work.

Theme:

Concern around the impact that development will have on the Chilterns Beechwoods from growth in Dacorum and in adjoining authorities.

Officer Comment:

The Local Plan will be subject to screening for potential impacts in accordance with legislative requirements. If further assessment of the Plan is required this will be undertaken and any mitigation incorporated into the Plan, as appropriate. Consideration will also be given to proposed development in adjoining authorities.

The Council will work with adjoining authorities through the duty to cooperate to identify potential impacts on protected sites.

Theme:

Water availability (including wastewater, drainage and other utility provision) is a major consideration and capacity is required to meet the needs arising from new development.

Officer Comment:

The Council will be developing its evidence further in this area through studies such as the Water Cycle Study. The Council will also look to the Infrastructure Delivery Plan

to identify the need for any additional capacity for water supply and sewerage/waste treatment capacity required to support proposed development.

Theme:

Consideration will need to be given to flood risk on sites and any required mitigation included prior to the site being developed.

Officer Comment:

These concerns are noted and the Council, through the Strategic Flood Risk Assessment will look at these issues further. The evidence will inform site selection as well as identifying any onsite mitigation required.

Theme:

Consideration will need to be given to potential pollution (water and air quality) arising from development. It is important that the Plan safeguards human and environmental health.

Officer Comment:

The Council will continue to develop its evidence base to further understand the human and environmental health considerations. The Council will consider the need to review and update any air quality studies and any information relating to air quality management areas across the Borough

The Plan will also be subject to Strategic Environmental Appraisal – the results of which will inform site selection and policy development.

Theme:

Environmental standards in all housing (new build and existing) should be set at the highest level to minimise environmental impacts and reduce/minimise carbon emissions.

Officer Comment:

The Council will consider policies and proposals to reduce and mitigate the impact of climate change. The Council will consider policies that improve upon existing Building Regulations, where it is appropriate to do so, taking into account other policies of the Plan and viability considerations.

Theme:

Provision for mental health care and the elderly person's accommodation/care is required.

Officer Comment:

The Plan will continue to develop its evidence base to ensure the Plan takes into account the needs for all types of accommodation over the plan period.

Theme:

Developer contributions should be secured to support development either through Section 106 agreements or through CIL. It was identified that there are existing infrastructure deficits across the Borough that should be address.

Officer Comment:

The Infrastructure Delivery Plan will identify future requirements to support new development and policies and site allocations. This will be supported by will be supported by a viability assessment of the Plan to underpin requirements for developer contributions.

Theme:

It was widely acknowledged that there are acute transport issues across the Borough which need to be considered as the Plan develops.

Officer Comment:

The Council will work closely with the County Council and other providers to understand the implications of development on the transport network. The Council look at future modelling requirements and identify mitigation measures required.

The Council will work with its partners to look at sustainable transportation proposals that can be integrated into development proposals.

7. Detailed Analysis

- 7.1 The responses received were individually reviewed and summary tables were produced for each question. Given the high level of response it was not possible to summarise every single comment and provide a response to it. The table below contained in appendix 3 analyse the number and nature of responses to each of the questions.
- 7.2 Appendix 4 is a detailed analysis of the points made by consultees to each question focussing on statutory consultees, Town/Parish Councils and other organisations. The Appendix also highlights common themes raised by multiple respondents. The Appendix includes a response indicating how the issues raised will be addressed through further work and evidence gathering and assessment to produce the submission version of the Plan.
- 7.3 It should be noted that in some cases despite stating a positive response to the yes/no option a significant number of the detailed comments that followed raised concerns and in some cases objections. The summary tables reflect this and there are instances where it may appear that the responses were incorrectly categorised; however, in all cases the assignment of comments to a yes or no category reflected the respondents stated yes/no answer.
- 7.4 A number of local resident and community groups also submitted comments and in many cases individual respondents referenced in whole or part the comments submitted by these groups including appending copies of these groups submissions to their individual/personal response. The resident groups include, but are not limited to:

Berkhamsted Citizens Association
Berkhamsted Residents Action Group
Bourne End Village Association
Grove Fields Residents Association
Kings Langley & District Residents Association
Leverstock Green Village Association
Piccotts End Residents Association
West Hemel Action Group

The comments from these organisations have in many cases been included in Appendix 4 as they were considered to represent the views of multiple respondents, many of the individual responses expressed support for the views expressed by a resident's organisation.

- 7.5 The individual comments on each question that are contained in Appendix 6 and include links to supporting documents; where the contributor has referenced the comments of a resident or community group these are shown through this link. The same document may, therefore, be revealed against multiple individual respondents. The details in Appendix 6 contains the full text of each submission from each respondent.
- 7.6 The only exception to the above approach was in respect of Question 1 which was specific to the SA process and it was considered that all comments should be addressed given the specific nature of the question. This approach was supplemented in Question 46 where the comments were SA specific.

8. Next Steps

- 8.1 The detailed responses below in Appendix 4 set out the actions that will be taken in response to individual comments, points and issues. There are a number of key pieces of work that will inform the further development and drafting of the Local plan. These primarily comprise the gathering of further evidence to inform the development of policies and the allocation of sites for development, the carrying out of the DtC and the SA and SEA of the Plan.
- 8.2 The evidence gathering will include a wide range of documents including (but not limited to):
- Local Housing Needs Assessment
 - Economy Study
 - Greenfield Site Assessment
 - Urban Capacity Study
 - Infrastructure Delivery Plan
- 8.3 The DtC involves engagement with a wide range of bodies including other Councils and Infrastructure providers to identify common issues and concerns and seek to find solutions or opportunities to address the issues through collaborative working.
- 8.4 The SA/SEA process is a statutory process to test and demonstrate that the eventual development strategy is appropriate for the area and that likely impacts have been identified and mitigated.
- 8.5 The representation at Issues and Options Stage will feed into the evidence gathering and other work to ensure that all pertinent matters are addressed and with the evidence gathered, DtC work and SA/SEA report culminate in the production of a full Local Plan which will be subject to consultation (likely to be in May/June 2020) prior to being submitted for examination. A further report will be produced summarising the next round of consultation on the Submission Plan.

Glossary

AA	Appropriate Assessment (under the HRA)
AMR	Authority Monitoring Report
(C)AONB	<i>(Chilterns)</i> Area of Outstanding Natural Beauty
AVDC	Aylesbury Vale District Council
BCC	Buckinghamshire County Council
BRAG	Bovingdon Residents action Group
CBC	Central Bedfordshire Council
CCG	<i>(Herts Valleys)</i> Care Commissioning Group
CIL	Community Infrastructure Levy
CPRE	Campaign to Protect Rural England
CRT	The Canal and River Trust
DBC	Dacorum Borough Council
DM	Development Management
DtC	Duty to Cooperate
EA	Environment Agency
EIA	Environmental Impact Assessment
ENS	Employment Needs Study
EZ	Enterprise Zone
FEMA	Functional Economic Market Area
GB	Green Belt
GFRA	Grove Fields Residents Association
GLA	Greater London Authority
GUI	Grand Union Investments
HBF	The Home Builders Federation
HCC	Hertfordshire County Council
HE	Homes England
Herts IQ	Hertfordshire Innovation Quarter <i>(alternative name for the EZ)</i>
HRA	Habitat Regulations Assessment
IDP	Infrastructure Delivery Plan
JSP	Joint Strategic Plan <i>(for South West Hertfordshire)</i>
KL&RDA	Kings Langley and District Residents Association
LDS	Local Development Scheme
LEP	Local Economic Partnership <i>(for Hertfordshire)</i>
LGVA	Leverstock Green Village Association
LHN	Local Housing Need
LHNA	Local Housing Need Assessment
LLA	London Luton Airport
LLFA	Lead local flood authority
LPA	Local Planning Authority
LVIA	Landscape Visual Impact assessment
MRAG	Markyate Residents Action Group
NPPF	National Planning Policy Framework
NPPG	National Planning Policy Guidance
OAN	Objectively Assessed <i>(Housing)</i> Need
PC	Parish Council
PDL	Previously Developed Land
The Plan	The emerging DBC Local Plan

SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment
SAC	Special Area of Conservation
SADC	St Albans City and District Council
SCI	Statement of Community Involvement
SFRA	Strategic Flood Risk Assessment
SHMA	Strategic Housing Market Assessment
SoCG	Statement of Common Ground
SPD	Supplementary Planning Document
SPEOSC	Strategic Planning & Environment Overview & Scrutiny Committee
TC	Town Council
WHBC	Welwyn Hatfield Borough Council

Appendix 1

Appendix 1

Total consultation notifications sent – 4724

DBC 1047 Email , 1121 Postal

Objective 2346 , Postal 210

Statutory Consultees

Adeyfield Library – Library Manager
Affinity Water – Strategic Planning
Aldwyck Housing Assn – Regional Development Manager
Amec Foster Wheeler on behalf of National Grid – Planning & design
Arriva The Shires – Business to Business Manager
Arriva The Shires – Operations Manager
Atisreal – Planning & Development
Aylesbury Vale District Council – Forward Plans manager
Aylesbury Vale District Council – Planning Policy Team
BAA Aerodrome Safeguarding
Bedford Borough Council – Planning Policy Team
Bedfordshire Police Authority
Berkhamsted Civic Centre
Berkhamsted Library – Library Manager
Berwin Leighton Paisner (For JD Wetherspoon)
Bovingdon Library – Library Manager
British Pipeline Agency – Lands & wayleaves Team
Broxbourne Borough Council – Planning Policy
Buckinghamshire County Council – Pitstone Cement Works – County Secretary
Bucks and West Herts Gypsy Advocacy (formerly Berkhamsted and District Gypsy Support Group)
Bucks County Council – Director of Place Services
Bucks County Council – Strategic Planning & Infrastructure Team
Bucks County Council – Strategic Planning Policy Team
Canal & River Trust – Area Planner South
Canal & River Trust – Waterways Manager
Canal and River Trust
CDA Herts – Rural Housing Enabler
Central Bedfordshire Council – Strategic Planning Manager
Chiltern District Council – Head of Sustainable Development
Chiltern District Council – Planning Policy
Chiltern Society and London Green Belt - Council Planning Officer
Chipperfield Mast Initiative
Community Action Dacorum
Council for British Archaeology
Dacorum Borough Council – Asst Director Environmental Services
Dacorum Borough Council – Conservation
Dacorum Borough Councillors
Dacorum Borough Herts County Councillors
Dacorum Borough Council – Environmental Services
Dacorum Borough Council – Environmental Services
Dacorum Borough Council – Strategic Housing
Dacorum Borough Council – Strategic Planning Green Spaces
Dacorum Citizens Advice Bureau
Dacorum Environmental Forum - Chair
Dacorum Heritage Trust
Dacorum Sports Trust

Defence Infrastructure Organisation
DEFRA – Permanent Secretary
Department for Communities and Local Government (DCLG)
Department for Transport – Secretary of State for Transport
Department of Business, Innovation & Skills
DTZ
East Herts District Council
East of England Planning Aid
East of England Strategic Health Authority
East of England Strategic Health Authority – Herts Strategy Manager
East of England Strategic Health Authority – Property Department
East of England Tourist Board – Planning Officer
EDF Energy
EDF Energy Network Service
Education & Skills Funding Agency
EE – Corporate & Financial Affairs Department
Environment Agency
Environment Agency – Planning Advisor
Environment Agency – Sustainable Places Specialist Major projects
Environment Agency – Sustainable Places Planning Advisor
Environment Agency – Sustainable Places Specialist
Environment Agency – Technical Specialist
Environment Agency Emergency Workforce – Operations Team Leader
Forest Enterprise England
Forestry Commission - Conservator
FWAG East – Farm Conservation Advisor
Greater London Authority – Strategic Planning
Gypsy & Traveller Section (HCC)
H I D / Health & Safety Executive – HM Principal Inspector
Hazardous Installations Directorate – HP Principle Inspector
HCA
HCA
HCC Environment Dept – Head of Landscape
HCC Environment Dept – Integrated Transport Services Manager
HCC Gypsy Section
Heathrow Airport Ltd
Hemel Hempstead Library – Library Manager
Hertfordshire County Council – Waste Services
Hertfordshire Association of Parish & Town Councils – Liaison Officer
Hertfordshire Chamber of Commerce
Hertfordshire Constabulary
Hertfordshire Constabulary - Estates & Facilities Department Spatial Planning Manager
Hertfordshire Constabulary – CPDA/DOCO
Hertfordshire Constabulary – Head of Estates & Facilities
Hertfordshire Constabulary – Network Team
Hertfordshire County Constabulary – Architectural Liaison Officer
Hertfordshire County Constabulary – Architectural Liaison Officer
Hertfordshire County Constabulary – Crime Prevention Design Officer
Hertfordshire County Council
Hertfordshire County Council
Hertfordshire County Council – Development Services Principal Planning
Hertfordshire County Council – Ecology & Biological Dept
Hertfordshire County Council – Forward Planning
Hertfordshire County Council - Information & Monitoring, Forward Planning Unit
Hertfordshire County Council – Minerals & Waste

Hertfordshire County Council - Natural Historic & Built Environment Advisory Team
Hertfordshire County Council – Natural History & Built Environment
Hertfordshire County Council – Natural History & Built Environment Advisory Team
Hertfordshire County Council - Natural, Historic & Built Environment Advisory Team
Hertfordshire County Council – Passenger Transport Unit
Hertfordshire County Council - Planning
Hertfordshire County Council – Principal Planning Officer
Hertfordshire County Council – Property Development Services
Hertfordshire County Council – Property Planning
Hertfordshire County Council – Public Health Department
Hertfordshire County Council – S106 Officer
Hertfordshire County Council – Senior Planning Officer
Hertfordshire County Council – Senior Planning Officer
Hertfordshire County Council – Strategy Manager
Hertfordshire County Council - Transport
Hertfordshire County Council – Waste Department
Hertfordshire Fire And Rescue Service – district Commander
Hertfordshire Gardens Trust – Planning Officer
Hertfordshire Gardens Trust – Planning Officer
Hertfordshire Gardens Trust – Conservation Officer
Hertfordshire Highways (HCC) – Transport Programmes & Strategy
Hertfordshire LEP
Hertfordshire Local Enterprise Partnership – Growth & Infrastructure
Hertfordshire Local Nature Partnership - c/o Herts Middx Wildlife Trust
Hertfordshire Local Studies Library – Library Manager
Hertfordshire Partnership NHS Foundation Trust
Hertfordshire Prosperity Ltd/LIC – Administrative Executive
Herts & Middx Wildlife Trust
Herts & Middx Badger Group – Development Overseer
Herts Building Preservation Trust
Herts CC – Highways – Highways Operations & Strategy
Herts CIL Reference
Herts County Council - Asst Director Transport
Herts County Council - CSF
Herts County Council - CSF
Herts County Council - CSF
Herts County Council – Early Years
Herts County Council – Economic Development
Herts County Council – Environment Director
Herts County Council – Planning Policy
Herts Highways – Strategy Department
Herts Museums – Museum Development Officer
Herts Valley Clinical Commissioning Group
Herts Valley Clinical Commissioning Group
Herts Valley Clinical Commissioning Group
Herts/Barnet Countryside Management – Director Planning & Estates
Hertsmere Borough Council – Environment Director
Hertsmere Borough Council – Spatial Planning
Highways Agency
Highways Agency – Senior Network Manager
Highways England
Highways England – Herts & Beds Planning Department
Highways England – M1 HADECS
Highways England - Network Strategy East
Highways England – Road renewals

Historic England
Historic England – Principal Historic Environment Planning Advisor
Home Builders Federation
Homes & Communities Agency (HCA) – East & South East Team
Homes & Communities Agency (HCA) – Herts, Beds & Cambs Area Manager
Housing Corporation
Kings Langley Library – Library Manager
Leverstock Green Library – Library Manager
Local Government Association
Local Government Ombudsman
London Lines – Property services Manager
London Luton Airport – Environment Manager
London Luton Airport Operations Ltd – General Manager
Luton Borough Council – Head of Planning
Luton Borough Council – Planning Policy Manager
Luton Borough Council - Principal Planner
Milton Keynes Council – Planning Policy Team
Milton Keynes Council – Planning Policy Team
Ministry of Agriculture, Fisheries and Food (MAFF) – Regional Planning Advisor
Ministry of Defence, DE Safeguarding
Ministry of Justice – Asset Management Unit
Ministry of Justice – Lead Estate Surveyor
Mouchel M25 Sphere
National Air Traffic Services – Safeguarding Team
National Grid – AMEC Foster – on behalf of National Grid
National Health Service Executive (NHSE)
National Health Service Executive (NHSE) – Asst Director Property Services
National Health Service Executive (NHSE) – Contract Manager & ETTF lead
Natural England - Consultation Service
Natural England – Consultations Team
Natural England – Land Use Operations Team
Natural England – Land Use Operations Team
Natural England –Lead advisor Norfolk, Suffolk team
Natural England – Planning & conservation Advisor
Network Rail – Town Planning Department
Network Rail – Town Planning Manager
Network Rail – Town Planning Technician LNW
NHS England
NHS Herts Valley CCG – Locality Officer
NHS Trust
North Hertfordshire District Council
North Hertfordshire District Council – Planning Policy team
North Herts Valleys CCG
Ordnance Survey – Navigation Spectrum & Surveillance Senior Surveyor
Royal Mail
Royal Mail Legal Services (Property Law)
RTPI East Of England
Rural Development Commission
SGN (Scotia Gas Network)
SGN South Strategy
South Bucks District Council – Planning Policy Manager
Sport England – Planning Manager
St Albans City & District Council – Spatial Planning Manager
Stevenage Borough Council – Planning & Engineering
Stevenage Borough Council – Planning Policy Manager

Stevenage Borough Council – Strategic Director
Telereal
Thames Valley Police Authority – Chief Executive
Thames Water - Savills (on behalf of Thames Water) Planning Team
Thames Water Utilities Ltd
The Environment Agency
The Information Centre – Library Manager
The Land Office
The National Trust – Ashridge Estate Property Manager
The National Trust – Business Support
The National Trust – Land Use & Planning
The National Trust – Land Use Planning Adviser
The National Trust – Planning Advisor
The National Trust Regional Office – Business Support
The Planning Inspectorate
The Royal Town Planning Institute
The Theatres Trust – Planning Department
Three
Three Rivers District Council – Head of Economic & Sustainable Development
Tring Civic Centre
Tring Library – Library Manager
UK Power Networks
Vodafone and O2
Watford Borough Council
Watford Borough Council – Planning Policy Section Head
Welwyn Hatfield Borough Council – Planning Policy Manager
West Herts Health Authority – Surgery Development Manager
West Herts Hospital Trust
West Herts Hospital Trust – Space & Property Manager
Western Area Police – Area Commander
Woodland Trust – Regional External Affairs Officer

Town & Parish Councils

Aldbury Parish Council
Berkhamsted Town Council
Bovingdon Parish Council
Chipperfield Parish Council
Flamstead Parish Council
Flaunden Parish Council
Great Gaddesden Parish Council
Kings Langley Parish Council
Kings Langley Parish Council
Leverstock Green Village Association
Little Gaddesden Parish Council
Markyate Parish Council
Nash Mills Parish Council
Nettleden with Potten End Parish Council
Northchurch Parish Council
Tring Rural Parish Council
Tring Town Council
Wigginton Parish Council

Neighbouring Parish Councils

Abotts Langley Parish Council
Ashley Green Parish Council
Aston Clinton Parish Council
Buckland Parish Council
Cheddington Parish Council
Chenies Parish Council
Cholesbury-Cum-St Leonard Parish Council
Chorleywood Parish Council
Drayton Beauchamp Parish Council
Edlesborough Parish Council
Harpenden Rural Parish Council
Halton Parish Council
Ivinghoe Parish Council
Mentmore Parish Council
Pitstone Parish Council
Redbourn Parish Council
Sarratt Parish Council
Slip End Parish Council
Wingrave with Rowsham Parish Council

Neighbouring District / Borough / County Councils

Aylesbury Vale District Council – Planning Policy Team
Buckinghamshire County Council – County Secretary
Bucks County Council – Strategic Planning Policy Team
Chiltern District Council – Head of Sustainable Development
Luton and South Bedfordshire Joint Technical Unit
Luton Borough Council – Head of Planning
St Albans City & District Council
Stevenage Borough Council
Three Rivers District Council
Three Rivers District Council
Watford Borough Council
Watford Borough Council
Welwyn Hatfield Borough Council

Representatiive Groups

Clubs and Societies

1st Bovingdon Scout Group
1st Bovingdon Scout Group
Berkhamsted Bowls Club
Berkhamsted Local History & Museum Society
Berkhamsted Local History & Museum Society
Bovingdon & District Horticultural Society
Boxmoor Arts Centre For Young People
British Film Institute
British Horse Society
Bucks Herts & Middx Camping & Caravanning Club
Bucks Herts & Middx Camping & Caravanning Club

Dacorum Architecture Forum
Dacorum Dolphins Swimming Club
Gade Dog Training Society
Hemel Hempstead Child Contact Centre
Hemel Hempstead Cycling Club
Hemel Hempstead Cyclists Touring Club
Hemel Hempstead Local History Society
Hertfordshire Scouts
Iain Rennie Hospice at Home
Iain Rennie Hospice at Home
Kings Langley Society Ltd
Local History & Museum Society
National Travellers Action Group (NTAG)
Pendley Sports Centre
Phasels Wood Scout Camp
Rural Heritage Society
Saddlers Walk Social Group
St Pauls Church Langleybury Wives Fellowship
The Chiltern Society
The Chiltern Society
The Garden Centre Group
The Georgian Group
The Lawn Tennis Association
The Hertfordshire Society
The St. Rose of Lima Association
The Society for the Protection of Ancient Buildings
The Tring Anglers
The Twentieth Century Society
Tring Athletic Football Club
Tring Bowling Club
Tring Hockey Club
Tring Lawn Tennis Club
Tring Rambling Club
Tring Sports Forum & Dacorum Sports Network
Tring Squash Club
Tring Swimming Club
Tring TLC
West Division Guides
Workers' Educational Association

Community Network Groups

Business Forum/Herts Chamber
Dacorum Cultural Forum
Dacorum Sports Network
DENS
Druglink Ltd
Galley Hill Children's Centre
Green Lane Children's Centre
Heath Lane Children's Centre
Hemel Hempstead Churches Together/ Urban Access
LAA Children and Young People's Block
Mediation Herts
Orchard Children's Centre
Relate

Tring Together
Windmill Children's Centre

Disability Groups

Age Concern
Age Concern
Dacorum Dolphin Swimming Club
Dacorum Talking Newspaper
Hemel Hempstead Access Group
Hertfordshire Action on Disability
Local Access Forum
Mind in Dacorum
POHWER
The Puffins
Tring Access Committee

Economic Development

Akzo Nobel
Aviva Investors
Berkhamsted & District Chamber of Commerce
Blackjack Investments Ltd
Dacorum Industrial Association
East of England International
EDAW
Hertfordshire Careers Services
Royal British Legion (Women's) Tring & Berkhamsted
West Herts College
West Herts Hertfordshire Chamber Of Commerce & Industry

Education

Abbot's Hill School
Adeyfield School
Aldbury C of E School
Ashlyns School
Ashlyns School
Astley Cooper School
Astley Cooper School
Aycliffe Drive Primary School
Beechwood Park School
Belswains Primary School
Berkhamsted School
Bishop Wood C of E School
Bishop Wood Junior Mixed School
Bovingdon Infants School
Bovingdon Primary Academy
Boxmoor House School
Boxmoor Primary School
Bridgewater Middle School
Broadfield JMI School
Broadfield Primary School
Brockswood JMI School
Brockswood Primary & Nursery School

Chambersbury JMI School
Collett School
Dundale Infants School
Dundale Primary School & Nursery
Egerton Rothesay School
Gaddesden Row JMI School
Gade Valley JMI & Nursery School
George Street Primary School
Goldfield Infants School
Great Gaddesden School
Greenway First & Nursery School
Grove Road Primary School
Grove Road Primary School
Hammond Academy
Hemel Hempstead School
Hobbs Hill Wood Primary School
Hobbs Hill Wood Primary School
Hobletts Manor Junior School
Holtsmere End Infant & Nursery School
John F Kennedy RC Secondary School
John F.Kennedy Catholic School
John F.Kennedy RC Secondary School
Kings Langley Primary School
Kings Langley Secondary School
Kings Langley Secondary School
Leverstock Green CE Primary School
Leverstock Green JMI School
Lime Walk JMI School
Lime Walk Primary School
Little Gaddesden Church of England Primary School
Lockers Park School
Lockers Park School
Long Marston JMI School
Long Marston VA Church of England School
Longdean Secondary School
Longdean Secondary School
Longdean Secondary School
Marlin Montessori Pre-School and Day Nursery
Micklem JMI School
Micklem Primary School
Nash Mills Church of England Primary School
Nash Mills JMI School
Pixies Hill Primary School
Potten End C of E First School
Potten End Primary School
Reddings JMI School
Reddings JMI School
Renewables East
St Albans Campus
St Albert the Great Catholic Primary School
St Albert The Great RC JMI School
St Bartholomew's C of E Primary School
St Cuthbert Mayne Catholic Junior School
St Cuthbert Mayne Catholic School
St Paul's JMI School

St Rose's Catholic Infants' School
St Rose's RC Infant School
St Thomas More Catholic Primary School
St Thomas More's RC JMI School
Swing Gate First School & Nursery
The Arts Educational School
The Berkhamsted Schools Group
The Cavendish School
Thomas Coram School
Thomas Coram School
Tring Park School for the Performing Arts
Tring School
Tring School
Tudor JMI School
Tudor Primary School
Two Waters JMI School
Two Waters Primary School
Victoria Church of England Infant and Nursery School
Victoria First School
West Herts College
Westbrook Hay Prep School
Westbrook Hay School
Westfield First School
Westfield First School and Nursery
Wigginton JMI School
Woodfield School
Yewtree Primary School
Zicer Building

Employers

Apsley Paper Trail
Ashridge Management College
Atlas Copco Compressors
Atlas Copco UK Holdings
BFI
British Gas Plc Eastern
British Standards Institute
Bull Information Systems
Chiltern of Bovingdon Ltd
Champneys
Couzens Storage Solutions
Jones Day
Marlowes Shopping Centre
Multicore Solders Ltd
Northgate Information Solutions
Sainsbury's

Ethnic Minority Groups

Africans Together In Dacorum
Asian Masti
Caribbean Women's Equality & Diversity Forum

Club Italia
Dacorum Chinese School Association
Dacorum Indian Society
Dacorum Multicultural Association / MWA
Hemel Anti Racism Council
Jewish Interests
Muskann - Pakistani Women's Association
Muslim Welfare Association

Local Resident / Pressure Groups

(Neighbourhood Action Group)
(Neighbourhood Action Group)
Action Against Injustice Caused by Dacorum Borough Council
Adeyfield Neighbourhood Association
Apsley Community Association
Apsley Community Association
Bellgate Area Residents Association
Bennetts End Neighbourhood Assn
Berkhamsted & District Chamber of Commerce
Berkhamsted & District Gypsy Support Group
Berkhamsted Citizens Association
Berkhamsted Citizens Association
Berkhamsted Citizens Association
Berkhamsted Civic Association
Berkhamsted Residents Action Group (BRAG)
Bourne End Village Association
Bourne End Village Association
Bovingdon Women's Institute
Briery Underwood Residents Association
Bucks & West Herts Gypsy Advocacy
Built Environment Advisory & Management Service
Campaign for Real Ale
Chaulden Infants School
Chaulden Infants School
Chaulden Neighbourhood Association
Chilterns Conservation Board
CPRE Hertfordshire
Dacorum Architecture Forum
Dacorum Borough Council Leaseholder Group
Dacorum Community Trust
Dacorum CVS
Dacorum Environmental Forum
Dacorum Environmental Forum Water Group
Dacorum Environmental Forum Waste Group
Douglas Gardens Street/Block Voice
Drayton Beauchamp (meeting)
Friends of Shrubhill Common
Friends of Tring Reservoirs
Gaddesden Row Village Voice
Gadebridge Community Association
Grass Roots UK
Groundwork Hertfordshire
Grove Fields Resident Association

Grovehill Community Centre
Grovehill Future Group
Grovehill Futures Group
Grovehill West Residents Association
Guinness Trust
Gypsy Council
Hales Park Residents Association
Heather Hill Residents Association
Hemel Hempstead High Street Assn.
Henry Wells Residents Association
Herons Elm Street/Block Voice
Hertfordshire Agricultural Society
Hertfordshire Gardens Trust
Hertfordshire Gardens Trust Conservation Team
Herts & Middlesex Badger Group
Herts & Middlesex Wildlife Trust
Herts Fed.Of Women's Institutes
Herts Natural History Society
Herts Natural History Society
Highfield Community Centre
Hightown Praetorian & Churches HA
Hunters Oak Residents Association
Hyde Meadows Residents Association
Kings Langley Community Association
Kings Langley Good Neighbours Association
Kings Langley Local History & Museum Society
Leverstock Green Village Association
Long Marston Tenants Association
Manor Estate Residents' Association
Markyate Village Hall Committee
Micklem Primary School
Nash Residents Association
Northend Residents Association
Pelham Court Residents Association
Piccotts End Residents Association
R.B.R. Residents Association
Ramblers Association
Ramblers Association
Ramblers Association
Redgate Tenants Association
Residential Boatowners Association
Rice Close Street/Block Voice
RSPB
S & W Herts WWF Group And Green Party
Save Your Berkhamsted Residents Association
Save Your Berkhamsted Residents Association
Shepherds Green Residents Association
Shepherds Green Residents Association
South Hill Primary School
St Albans Enterprise Agency
Street Block Voice (Hilltop Corner, Berkhamsted)
Street Block Voice (Typleden Close)
Street Block Voice (Winchdells)
Street Block Voice (Winchdells)
Street Block Voice (Winchdells)

Tenant Participation Team
The Bovingdon Action Group
The Box Moor Trust
The Briars & Curtis Road Street/Block Voice
The Chiltern Society
The Inland Waterways Association
The Mount Residents Association
The Planets Residents Association
The Quads Residents Association
The Tudors Residents Association
Thumpers Residents Association
Transition Town Berkhamsted
Tring Community Assn
Tring Environmental Forum
Tring Sports Forum
Village Voice (Little Gaddesden)
Warners End Neighbourhood Association
Wendover Arm Trust
West Hemel Action Group (WHAG)
Westfield Road Street/Block Voice
Woodland Trust

Local Strategic Partnership groups

Churches Together
Countryside Management Service
Dacorum Chinese Community Association

National Pressure Groups

Ancient Monuments Society
Confederation of British Industries
Confederation of British Industries
Country Land & Business Association
Derbyshire Gypsy Liaison Group
English Rural Housing Association
English Rural Housing Association
Friends of the Earth
Garden History Society
Gypsy Council
Home Builders Federation
N S C A
National Federation of Gypsy Liaison Groups
NFU East Anglia Region
Outdoor Advertising Council
RSPB
Rural Housing Trust
Rural Housing Trust
The Architectural Heritage Fund
The Bell Cornwell Partnership
The British Wind Energy Association
The Housing Corporation

The Ramblers Association
The Victorian Society
Timber & Forestry Association
Town & Country Planning Association

Political Groups

Constituency Officer for South West Herts
Hemel Hempstead Conservative Association
Hemel Hempstead Co-Op Party
The Green Party
Dacorum Green Party
UKIP Hemel Hempstead

Voluntary Organisations

B-Hive
Chiltern Woodlands Project
English Sangha Trust
Gadebridge Youth Club
Grove Hill Youth Centre
Hemel Hempstead Community Church
Herts Committee for V.S.O.
Herts Groundwork Trust
HGT Conservation Team
Housing Link
New Gospel Halls Trust
Shaftsbury Housing Assn
St George's Church
St. George's United Reformed Church
The Gardens Trust
The New Gospel Hall Trust
William Sutton Trust
William Sutton Trust

Others consulted

Agents Forum – 39

Estate Agents – 42 +1

Landowners & Agents – 120 + 32

Residents / Individuals – 1035 +1971

Media Organisations – 8

Planning & Development Agent / Consultants – 156 +28

Research Organisation – 1

Retirement Housing Developers – 6

Surveyors & Architects – 74

Appendix 2

Appendix 2

1) St Albans Review & Gazette Newspaper Consultation Public Notices



Dacorum's New Local Plan: Issues and Options Notice of Public Consultation



This notice is provided in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004

What is the consultation about?

Dacorum Borough Council is in the process of preparing a new Local Plan for the Borough. The first stage of this process is the preparation of an 'Issues and Options' document which looks at the challenges the Borough is facing to 2036, and how these could be addressed. Once finalised, the new Local Plan will replace the Core Strategy and Site Allocations DPDs and the 'saved' policies from the 2004 Local Plan. A draft Sustainability Appraisal Working Note, which assesses the potential social, economic and environmental implications of the issues and options put forward, has also been published for comment. Other supporting documents are also available, including information on key sites which have been suggested by landowners and developers for future housing and other uses.

When can I comment and where are the documents available?

The Council is inviting comments on this 'Issues and Options' document, draft Sustainability Appraisal Working Note and other associated documents between **1st November and 13th December 2017**. The Council is also undertaking a 'Call for Sites' during the same period.

All information and documents relating to the consultation is available:

- via the Council's consultation portal <https://dacorum-consult.objective.co.uk/portal/planning/lp/io/io>;
- on the Council's website <http://www.dacorum.gov.uk/newlocalplan>;
- at public libraries within the Borough (during normal opening hours); <https://www.hertfordshire.gov.uk/libraries>; and
- at Borough Council offices during the following opening hours:

Civic Centres	Berkhamsted 161 High Street, HP4 3HD	Hemel Hempstead The Forum, HP1 1DN	Tring Victoria Hall, HP23 6AA
Monday	9am - 12.30pm and 1.30pm - 5pm	8.45am - 5.15pm	9am - 12.30pm and 1.30pm - 5pm
Tuesday	9.30am - 2pm		CLOSED
Wednesday	CLOSED	8.45am - 4.45pm	9.30am - 2pm
Thursday	9.30am - 2pm		CLOSED
Friday			9.30am - 2pm

How can I comment?

Comments should be received in writing before **midnight on Wednesday 13th December 2017**. Please make it clear whether your comments relate to the Issues and Options document itself or to the draft Sustainability Appraisal Working Note.

You are invited to submit your comments electronically:

- using the Council's consultation portal; or
- by email using the comments form provided on our website.

Copies of the comments form are available to download, complete and email back, or to print and return by post to our addresses below. A limited number of paper copies of the comments form will be available at the venues listed above.

Comments received cannot be treated as confidential and will be available to view publicly. However, published comments will exclude your personal contact details and include only your name.

If you wish to promote a site for development within the Borough, under the Local Plan or Brownfield Land Register, this should be submitted through the separate Call for Sites processes. Submission forms can be downloaded from: www.dacorum.gov.uk/callforsites.

When are the public exhibitions?

There will be public exhibitions attended by representatives of the Council during the consultation period. Further information regarding these dates, times and venues can be found on the Council's website at <http://www.dacorum.gov.uk/newlocalplan>.

Further information

Please contact the Strategic Planning and Regeneration team if you have any questions or require more information:

Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228660

Address: Strategic Planning and Regeneration Team, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

Hertfordshire County Council

PLANNING NOTICE

Hertfordshire County Council is applying for planning permission for: The extension and alteration to the fire station to accommodate the co-location of a library at Redbourn Fire and Ambulance Station, Dunstable Road, Redbourn, AL3 7PQ. Please note this application proposes development in the Green Belt.

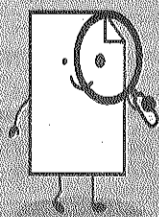
Copies of the application can be seen at Hertfordshire County Council, County Hall, Hertford and at City & District of St. Albans, Civic Centre, St. Albans, AL1 3JE. Representations should be sent to Spatial Planning and Economy, CHN216, Environment Department, County Hall, Pegs Lane, Hertford SG13 8DN, or email spatial.planning@hertfordshire.gov.uk, within 21 days from the date of this Notice, i.e. by **Wednesday 22nd November 2017**.

1 November 2017.

John Wood, Chief Executive & Director of Environment,
County Hall, Hertford, Herts SG13 8DN.



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PUBLIC NOTICES

PUBLIC NOTICES



Dacorum's New Local Plan: Issues and Options Notice of Public Consultation

This notice is provided in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004.

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Tuesday	9.30am - 2pm	8.45 am - 5.15 pm	CLOSED
Wednesday	CLOSED		9.30am - 2pm
Thursday	9.30am - 2pm		CLOSED
Friday		8.45 am - 4.45 pm	9.30am - 2pm

How can I comment?

Comments should be received in writing before 23:59 on **Wednesday 13th December 2017**. Please make it clear whether your comments relate to the Issues and Options document itself or to the draft Sustainability Appraisal Working Note.

You are invited to submit your comments electronically:

- using the Council's consultation portal; or
- by email using the comments form provided on our website.

Copies of the comments form are available to download, complete and email back, or to print and return by post to our addresses below. A limited number of paper copies of the comments form will be available at the venues listed above.

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Further information

Please contact the Strategic Planning and Regeneration team if you have any questions or require more information:
Email: strategic.planning@dacorum.gov.uk
Phone: 01442 228660
Address: Strategic Planning and Regeneration Team, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, Hertfordshire, HP1 1DN

Local Government (Miscellaneous Provisions) Act 1982 (as amended) APPLICATION FOR A SEX ESTABLISHMENT LICENCE

We, Darker Enterprises Limited of Unit 3, Chancerygate Business Centre, 33 Tallon Road, Hutton, Brentwood, Essex, CM13 1TE has applied to Dacorum Borough Council for the Renewal of a Sex Establishment Licence in respect of the following premises: Private Shop - 193 London Road, Hemel Hempstead, Herts, HP3 9SE. Authorisation is sought to utilise this premises as a sex shop. Further details about this application may be inspected at the offices of Dacorum Borough Council, Licensing Section, Civic Centre, Marlowes, Hemel Hempstead, HP1 1DH, during normal opening hours. Any person wishing to object to this application must give notice in writing of their objection, stating in general terms the grounds of the objection. Objections may be sent to the above address, or emailed to licensing@dacorum.gov.uk and must be received no later than 28th November 2017. For further information, please contact the Licensing Section on 01442 228000 or by email to licensing@dacorum.gov.uk

LINDA MARIE STURTEVANT (Deceased)

Pursuant to the Trustee Act 1925 any persons having a claim against or an interest in the Estate of the aforementioned deceased, late of 24 Arkley Court Arkley Road Hemel Hempstead Hertfordshire HP2 7JT, who died on 13/09/2017, are required to send particulars thereof in writing to the undersigned on or before 03/01/2018, after which date the Estate will be distributed having regard only to claims and interests of which they have had notice.
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Hertfordshire County Council

THE HERTFORDSHIRE (TEMPORARY CLOSING OF VICARAGE LANE, KINGS LANGLEY) ORDER 2017

NOTICE is given that the Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all traffic from using that length of Vicarage Lane, Kings Langley from its junction with Five Acres westwards for a distance of approximately 70 metres ("the Road"), except for access.

An alternative route will be via Vicarage Lane, A4251 High Street and Langley Hill. The Order is needed because gas service works are proposed to be executed on or near the Road.

The Order has been made and shall come into force on 6 November 2017 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.

A copy of the Order may be inspected free of charge at County Hall, Hertford between the hours of 9.00am and 5.00pm (excluding weekends, bank and public holidays).

If you have any queries about the Order, please contact Simon Herbert tel. 03301 596140 at Cadent Gas or Tommy Clew tel. 0300 123 4047 at Hertfordshire County Council.

THE HERTFORDSHIRE (TEMPORARY CLOSING AND TEMPORARY WAITING RESTRICTIONS IN B487 QUEENSWAY, HEMEL HEMPSTEAD) ORDER 2017

NOTICE is given that the Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all traffic from using that length of B487 Queensway, Hemel Hempstead from a point 70 metres south west of its junction with Great Road north eastwards for a distance of approximately 140 metres ("the Road"), except for access.

An alternative route will be via B487 Queensway, A4146 Leighton Buzzard Road, A4147 (Link Road/Hemel Hempstead Road) and B487 Queensway.

ADDITIONALLY all vehicles are prohibited from waiting at any time on both sides of this length of the Road whilst works are in progress.

The Order is needed because works are proposed to be executed on or near the Road.

The Order has been made and shall come into force on 6 November 2017 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.

A copy of the Order may be inspected free of charge at County Hall, Hertford between the hours of 9.00am and 5.00pm (excluding weekends, bank and public holidays).

If you have any queries about the Order, please contact Mackenzie Van Thof tel. 01992 658469 at Ringway.

THE HERTFORDSHIRE (TEMPORARY CLOSING OF DUNCOMBE ROAD, NORTHCHURCH) ORDER 2017

NOTICE is given that the Hertfordshire County Council has made the above Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all traffic from using that length of Duncombe Road, Northchurch from its junction with Alma Road north eastwards for its entire length ("the Road"), except for access.

There is no alternative route available for vehicles when the works are being carried out. However vehicular access to properties in this road will be maintained whenever possible throughout the duration of the works.

The Order is needed because utility service works are proposed to be executed on or near the Road.

The Order has been made and shall come into force on 6 November 2017 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.

A copy of the Order may be inspected free of charge at County Hall, Hertford between the hours of 9.00am and 5.00pm (excluding weekends, bank and public holidays).

public holidays).

If you have any queries about the Order, please contact Tim Coulter tel. 02890 708297 at Highway Barrier Solutions or Tommy Clew tel. 0300 123 4047 at Hertfordshire County Council.

THE HERTFORDSHIRE (TEMPORARY TRAFFIC MANAGEMENT MEASURES ON BENCHLEYS ROAD, HEMEL HEMPSTEAD AND HIGH STREET, BOVINGDON) ORDER 2017

NOTICE is given that the Hertfordshire County Council intends to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, the effect on the following lengths of roads ("the Roads") will be:-

- To prohibit all traffic from using that length of Benchleys Road, Hemel Hempstead from its junction with Northridge Way north eastwards for a distance of approximately 55 metres, except for access.
An alternative route will be via Northridge Way, Lower Sales and Benchleys Road.
- To prohibit all vehicles from waiting at any time on both sides of the following lengths of roads whilst works are in progress:-
 - that length of Benchleys Road, Hemel Hempstead from its junction with Northridge Way north eastwards for a distance of approximately 55 metres.
 - that length of High Street, Bovington from its junction with New Hall Close south eastwards for a distance of approximately 190 metres.

The Order is needed because works are proposed to be executed on or near the Roads.

If the Order is made, it shall come into force on 20 November 2017 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Roads.

A copy of the proposed Order may be inspected free of charge at County Hall, Hertford between the hours of 9.00am and 5.00pm (excluding weekends, bank and public holidays).

If you have any queries about the proposed Order please contact Rachael Stephens tel. 0300 123 4047 at Hertfordshire County Council.

THE HERTFORDSHIRE (TEMPORARY CLOSING OF DARRS LANE, NORTHCHURCH) ORDER NO.2 2017

NOTICE is given that the Hertfordshire County Council intends to make an Order under Section 14(1) of the Road Traffic Regulation Act 1984, to prohibit all traffic from using that length of Darrs Lane, Northchurch from its junction with Shootersway north eastwards to its junction with Granville Road ("the Road"), a distance of approximately 693 metres, except for access.

An alternative route will be via Shootersway, Durrants Lane, Westfield Road and Granville Road.

The Order is needed because gas service works are proposed to be executed on or near the Road.

If the Order is made, it shall come into force on 20 November 2017 for a period of up to 18 months. However, the restrictions specified shall only take effect at the times indicated by signs on or near the Road.

A copy of the proposed Order may be inspected free of charge at County Hall, Hertford between the hours of 9.00am and 5.00pm (excluding weekends, bank and public holidays).

If you have any queries about the proposed Order, please contact Simon Herbert tel. 03301 596140 at Cadent Gas or Tommy Clew tel. 0300 123 4047 at Hertfordshire County Council.

1 November 2017.
John Wood, Chief Executive & Director of Environment, County Hall, Hertford, Herts SG13 8DN.



TOWN AND COUNTRY PLANNING ACT 1990 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

Planning (Listed Buildings and Conservation Areas) Regulations 1990
Town and Country Planning (Development Plans and Consultation) (Departures) Direction 1999

PUBLIC NOTICE OF APPLICATIONS

The following applications have been received by the Borough Council, and copies of them can be inspected at the Civic Centre in Hemel Hempstead. If, in the case of those applications advertised as a 'DEPARTURE', you wish to object to the grant of planning permission, or, in the case of any other applications, you wish to comment on the proposals, you should write to the Head of Planning and Regeneration within the next twenty one days. Plans can be inspected on the website at www.dacorum.gov.uk/planning. Further enquiries, please ring 01442 867861.



- 4/02493/17/ROC** Is Major Development 89 SUNNYHILL ROAD, HEMEL HEMPSTEAD, HP1 1TA VARIATION OF CONDITION 5 (APPROVED PLANS) TO PLANNING PERMISSION 4/00529/16/RES (SUBMISSION OF RESERVED MATTERS, CONDITION 6 (APPROVAL OF THE DETAILS OF THE HARD AND SOFT LANDSCAPING, MEANS OF ENCLOSURE, LEVELS, CYCLE STORAGE, BACK-UP GENERATOR, HANDRAIL, REFUSE LIGHTING AND SIGNS, SERVICES AND BIODIVERSITY) TO OUTLINE PLANNING PERMISSION 4/00552/12/MOA - (CONSTRUCTION OF SEVEN DWELLINGS AND SIX APARTMENTS AND ACCESS ROAD (AMENDED SCHEME))
- 4/02569/17/FUL** Pl App affect setting of LB & char of CA 9 AKEMAN STREET, TRING, HP23 6AA CONSTRUCTION OF A SHADE SAIL
- 4/02593/17/LBC** Listed Building Consent 81A MARLOWES, HEMEL HEMPSTEAD, HP1 1LF DISMANTLING AND REMOVAL OF THE LINKING WALL AND STRUCTURES TO THE REAR OF 81-85 THE MARLOWES, INCLUDING 81A THE MARLOWES.
- 4/02611/17/LPA** Prior Notification REAR OF 81-82, AKEMAN STREET & PART 71-80 AKEMAN STREET, TRING, HP23 6AF CHANGE OF USE FROM LIGHT INDUSTRIAL B1(C) TO RESIDENTIAL (C3).
- 4/02652/17/FHA** Pl App affecting char of Cons'tation Area 150 GEORGE STREET, BERKHAMSTED, HP4 2EJ REPLACEMENT WINDOWS AT FIRST FLOOR. ENLARGE WINDOW OPENING AT GROUND FLOOR. BOUNDARY WALL.
- 4/02659/17/LBC** Listed Building Consent THE QUAKER MEETING HOUSE, 1 THE ALLEYS, HEMEL HEMPSTEAD, HP2 5ZB REPLACEMENT WINDOW

LICENSING ACT 2003 APPLICATION FOR VARIATION OF PREMISES LICENCE

A.F. Blakemore & Son Ltd trading as Blakemore Retail have applied to Dacorum Borough Council to vary a Premises Licence in respect of the following premises:

SPAR - 2-3 LEVERSTOCK GREEN SHOPPING CENTRE, HEMEL HEMPSTEAD, HP3 8QG

The nature of the variation is as follows:

To allow the sale of alcohol for consumption off the premises between the hours of 07.00 - 23.00 hours daily

The copy of this application may be inspected during normal office hours at Licensing, Dacorum Borough Council, The Forum, Marlowes, Hemel Hempstead, HP1 1DN or via the licensing authority's website at www.dacorum.gov.uk/licensing

A responsible authority or any other person may make representation to the licensing authority in respect of this application. Representations must be made in writing either by post to the above address or by email to licensing@dacorum.gov.uk and must be received no later than 23rd November 2017

It is an offence to knowingly or recklessly make a false statement in connection with a licensing application and the maximum fine for which a person is liable on summary conviction for that offence shall not exceed level 5 on the standard scale (£5000)

TO ADVERTISE CALL
0207 084 5207

2) Consultee notification letter – postal & email

Date: 30th October 2017
Your Ref.
Our Ref: Issues & Options Consultaion
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Directline: 01442 228660
Fax:



The Forum
Marlowes
Hemel Hempstead
Hertfordshire
HP1 1DN

Telephone: 01442 228000
www.dacorum.gov.uk
DX 8804 Hemel Hempstead
D/deaf callers, Text Relay:
18001 + 01442 228000

«tiTitle» «Forename» «Surname»
«Organisation»
«Address_1»
«HouseNumber» «Street»
«District»
«Town»
«County» «Post_Code»

Dear «tiTitle» «Forename» «Surname»

DACORUM'S NEW LOCAL PLAN - CONSULTATION ON ISSUES AND OPTIONS AND 'CALL FOR SITES'

What is this consultation about?

Dacorum Borough Council is in the process of preparing a new Local Plan for the borough. The first stage of this process is the preparation of an 'Issues and Options' document which looks at the challenges the Borough is facing to 2036, and how these could be addressed. Once finalised, the new Local Plan will replace the Core Strategy and Site Allocations DPDs and 'saved' policies from the 2004 Local Plan.

A draft Sustainability Appraisal Working Note, which assesses the potential social, economic and environmental implications of the issues and options put forward, has also been published for comment.

Other supporting documents are also available, including information on key Green Belt sites which have been put suggested by landowners and developers for future housing and other uses.

When can I comment and where are the documents available?

The consultation begins at 9am on Wednesday^{1st} November and closes at midnight on Wednesday 13th December 2017.

All information and documents relating to the consultation is available:

- via the Council's consultation portal
- <https://dacorum-consult.objective.co.uk/portal/planning/lp/io/io>
- on the Council's website <http://www.dacorum.gov.uk/newlocalplan>;
- at public libraries within the borough (during normal opening hours): <https://www.hertfordshire.gov.uk/libraries>; and
- at Borough Council offices (during normal opening hours).



If you wish to promote a site for development within the Borough, under the Local Plan or Brownfield Land Register, this should be submitted through the separate Call for Sites processes which is running in parallel with the Issues and options consultation. Submission forms can be downloaded from: www.dacorum.gov.uk/callforsites.

When are the public exhibitions?

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Bovingdon Memorial Hall High Street Bovingdon HP3 0HJ	Friday 24 th November	

How can I find out more?

Please contact the Strategic Planning and Regeneration team if you have any questions or require further information:

Email: strategic.planning@dacorum.gov.uk

Phone: 01442 228660

Address: Strategic Planning and Regeneration Team, Dacorum Borough Council.
The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

Yours sincerely,



Laura Wood
Team Leader - Strategic Planning
Dacorum Borough Council

3) Consultation portal Consultee notification - postal

Date: 30th October 2017
Your Ref.
Our Ref: Issues & Options Consultaion
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Directline: 01442 228660
Fax:



The Forum
Marlowes
Hemel Hempstead
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HP1 1DN

Telephone: 01442 228000
www.dacorum.gov.uk
DX 8804 Hemel Hempstead
D/deaf callers, Text Relay:
18001 + 01442 228000

«ContactFull_Name»
«ContactOrganisation_Details»
«Address_Line_1»
«Address_Line_2»
«Address_Line_3»
«Post_Town»
«County» «Post_Code»

Dear «ContactFull_Name»

DACORUM'S NEW LOCAL PLAN - CONSULTATION ON ISSUES AND OPTIONS AND 'CALL FOR SITES'

Your consultaion ID «ContactPerson_ID»
Username «ContactUsername»

What is this consultation about?

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Phone: 01442 228660

Address: Strategic Planning and Regeneration Team, Dacorum Borough Council.
The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

Yours sincerely,



Laura Wood
Team Leader - Strategic Planning
Dacorum Borough Council

4) Consultation portal consultee notification – Agent / client

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Your Ref.
Our Ref: Issues & Options Consultaion
Contact: Strategic Planning
Email: Strategic.planning@dacorum.gov.uk
Directline: 01442 228660
Fax:



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Marlowes
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HP1 1DN

Telephone: 01442 228000
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«Full_Name»
«Organisation_Details»
«Address_Line_1»
«Address_Line_2»
«Address_Line_3»
«Post_Town»
«County» «Post_Code1»

Dear «Full_Name»

DACORUM'S NEW LOCAL PLAN - CONSULTATION ON ISSUES AND OPTIONS AND 'CALL FOR SITES'

Re your client - «ContactFull_Name» Client ID «ContactPerson_ID»,
Client username «ContactUsername»

Your «Person_ID1», «Username1»

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Dacorum
Look no further



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The Forum, Marlowes, Hemel Hempstead, Hertfordshire. HP1 1DN

Yours sincerely,



Laura Wood
Team Leader - Strategic Planning
Dacorum Borough Council

5) Consultation portal consultee notification email



Dear **XXXXXX**

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Please note: your username to access the portal and make comments is **XXXXXX** .

If you've forgotten your password, please go to <https://dacorum-consult.objective.co.uk/common/forgottenPassword.jsp>

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Yours sincerely,

Laura Wood
Team Leader - Strategic Planning
Dacorum Borough Council

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To unsubscribe please click on the link below or paste it into your browser:

<https://dacorum-consult.objective.co.uk/common/unsubscribe.jsp?guid=FBEA7AEB-79E2-768B-5908-6963A6C8AB67>

Appendix 3

Appendix 3

Public Exhibitions

The public exhibition venues, dates and times were included as part of the Consultation notification letter / emails as below

When are the public exhibitions?

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Dacorum Parish Councils were also sent Public Exhibition poster to enable them to advertise locally

The public exhibitions were also advertised in the local newspapers, St Albans Review & Gazette Public Exhibition adverts

NEWS

BUSINESS IMPROVEMENT DISTRICT (BID) APPROVED FOR HEMEL HEMPSTEAD

£1m booster follows town firms' vote for new district

By JAMES AVERILL
james.averill@jpress.co.uk
01908 851313 @JAverillJourno

A scheme to improve Hemel Hempstead town centre has been voted through by its local businesses.

Firms have clubbed together to create a Business Improvement District (BID) which will be boosted with investment to make the area more thriving.

The district, which is made up of most of the two shopping centres and town centre up to Combe Street, will get a £1million boost over the next five years.

The BID was developed by Central Management Solutions, and was jointly funded by Dacorum Borough Council and Capital & Regional, which owns The Marlowes.

Businesses were invited to vote on the scheme, and 84 per cent of those which completed the ballot voted in favour.

The vote saw a turnout of 37 per cent, and its approval will see a business plan put together covering 2018-2023.

Priorities for the BID scheme include improving visitor experience and the working environment, accessibility, cleanliness, waste removal, recycling and marketing of the district.

BID Steering Group chair, and Marlowes Shopping Centre manager Vince Williams said: "This is a fantastic result for the town.

"It gives us the opportunity to bring businesses together to shape our future over the next five years, by putting the building blocks in place to create a vibrant town centre that



The BID encompasses much of the town centre in Hemel Hempstead

will attract more visitors, who are staying longer and spending more money."

Mark Gaynor, Dacorum Borough Council's corporate

director for regeneration, added: "The 'yes' vote is a huge economic boost for the town centre. We're looking forward to being part of the BID."

Herts Fire and Rescue recruits

20 trainee firefighters have joined the force in Herts. Chief Fire Officer Darryl Keen formally welcomed the group after 15 weeks of intensive training. The recruits include eight who will be spread across four watches based at Hemel. At the same event, the fire service also welcomed six new fire control operators who will answer 999 calls and manage the emergency response from the service control centre in Stevenage.

£7k bill for illegally subletting home

A man will have to pay over £7,000 after subletting his social housing. Nicholas Couldridge, 41, of The Bourne, Bovingdon, appeared at St Albans Magistrates' Court on October 18. Dacorum Borough Council worked with Hightown Housing Association to prove that Couldridge was unlawfully subletting his property to a third party. He was fined £1,600, an unlawful profit order of £5,000, plus costs.

Don't fall for speeding scam

Herts Police are warning about a scam email which is being sent out to the public in an attempt to extort money from them by indicating that they have been caught speeding. A legitimate Notice of Intended Prosecution (NIP) is always sent as a physical letter sent via first class post.

New supermarket in petrol station

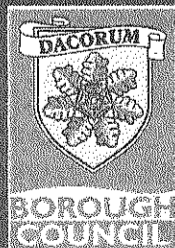
A Budgens store opened at the Shell garage in Berkhamsted High Street last week. Shell UK retail general manager David Moss said: "Whether you need to purchase groceries for your dinner tonight or pick up a quick snack, Budgens at Shell will have options for everyone."

Local Plan to 2036

Give us your views.

Come along to find out more about the new local plan and have your say. We will be in the following areas from 2pm-9pm:

- Kings Langley, Kings Langley Cricket Club (Monday 13 November)
- Tring, Pendley Manor (Tuesday 14 November)
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- Bovingdon, Bovingdon Memorial Hall (Friday 24 November)



For further information on the consultation please visit www.dacorum.gov.uk/newlocalplan

Consultation period:
1 November to 13 December 2017



COMMENT ONLINE
www.dacorum.gov.uk/newlocalplan

Shaping growth in Dacorum

Top three things to do

Shalamar

World renowned R&B and soul music vocal group Shalamar are appearing at The Alban Arena on Friday, November 3 at 7.30pm.

Shalamar are one of the most successful soul groups of all time, selling 25 million albums worldwide.

Hugely popular throughout the 1970s and 80s, they've had many world-wide hits such as Night to Remember, There It Is, I Can Make You Feel Good, and many others that you are sure to hear on this incredible evening of funk and soul. A Night to Remember, the 2017 Shalamar tour, features Howard Hewett, Carolyn Griffey, Jeffrey Daniel and their live band.

The Alban Arena, Civic Centre, St Albans, AL1 3LD. Details: 01727 844488

West Side Story

After bringing a bit of the West End to St Albans with Sister Act, the NODA awarding winning St Albans Musical Theatre Company, SAMTC (formerly St Albans Operatic Society) now present their new production of West Side Story from November 7 to 11, at the Alban Arena.

Telling the story of Romeo and Juliet but set in the midst of the teenage gang wars of New York's west side in the 1950s, this musical has dark themes, large dance sections and complex music. It features songs including

America, One Hand, One Heart, I Feel Pretty and Somewhere.

Based on a conception of Jerome Robbins book by Arthur Laurents, Music by Leonard Bernstein, lyrics by Stephen Sondheim. Entire original production directed and choreographed by Jerome Robbins. Originally produced on Broadway by Robert E. Griffith and Harold Prince by arrangement with Roger L. Stevens.

This amateur production is presented by arrangement with Josef Weinberger LTD. on behalf of Music Theatre International of New York

The Alban Arena, Civic Centre, St Albans, AL1 3LD. Details: 01727 844488

The Crucible

Based on the 17th century witch trials in Salem, Massachusetts, OVO theatre company is bringing Arthur Miller's timeless parable, The Crucible, to the Maltings Arts Theatre from November 8.

Inspired by the paranoia about Communists that was whipped up by Senator Joseph McCarthy in the 1950s, resulting in a presidential executive order called the 'red scare', in which Miller himself became embroiled, the play tackles the danger of religious fundamentalism and the mind set of those who believe that they should kill in the name of god.

The year is 1692, in the small tight-knit

community of Salem, where the daughter of Reverend Parris is found unconscious with no discernible physical cause. Accusations of witchcraft and sightings of the devil are made, and as lie upon lie is told and personal grievances collide with lust and superstition, the townsfolk of Salem find themselves in the eye of a religious storm, fuelled by widespread hysteria.

Winning the Tony Award for Best Play in 1953 when it was first performed, and now regarded as a central work in American drama, this superb play attacks the evils of mindless persecution and the terrifying power of false accusations, showing how innocent men and women can be destroyed by malicious rumour, retaining its relevance today.

Director Janet Podd says: "We have chosen to stage the play in the round, in order to increase the audience's involvement and to suggest the play's mounting sense of claustrophobia. But, more than anything, we wanted the play to be about the search for a personal truth in a society where religion, increasingly dominated by repressive practices and fear, created a need, particularly in the young, for greater individual freedom."

The Maltings Arts Theatre, Level 2, The Maltings, St Albans, AL1 3HL. Details: maltingsarts theatre.co.uk

CHRISTMAS GIFT IDEAS FOR YOU

THE KNEBWORTH CHRISTMAS FAIR

East Anglia's popular and possibly largest Christmas Fair returns to Knebworth House with a massive 250 stalls, easily accessible within the barns as well as marquees and outside seasonal trade stands. So whatever the weather you can browse, sample and buy from a wide range of Christmas and Seasonal goodies, enjoy a coffee, a light lunch or even a glass of mulled wine whilst you enjoy kick-starting your Christmas shopping.

Meet Father Christmas in his Grotto as well as his very own reindeer.

Admission: £5 adults, £5 children (includes visit to Father Christmas's Grotto)

pre-booked admission discounts at oakleighfairs.co.uk/the-knebworth-christmas-fair/

NO DOGS PLEASE AT THIS EVENT

supported by **MERCURY**

Friday 10
Saturday 11
and
Sunday 12
November
between 10am and 4pm each day

Knebworth House

Hertfordshire SG1 2AX

Love British Food
CRAFT DESIGN MONTH
Knebworth

Local Plan to 2036

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1 November to 13 December 2017

COMMENT ONLINE

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Shaping growth in Dacorum

Appendix 4

Question Number 01	
Question Text: Question 1 Do you agree with the conclusions reached in the Sustainability Appraisal that accompanies this Issues and Options document? Yes / No.	
<i>If no, please explain why and what you think needs to be amended.</i>	
Key Points raised in representations	Officer response and/or further actions
Note: of the 718 responses to Q1, over 35% made no reference to the Sustainability Appraisal. These responses have therefore been picked up in the reports for the other questions. A further 17% of the responses related specifically to the SA Working Note for the Schedule of Site Appraisals and are therefore covered by the report for Question 46.	
<p>Environment Agency</p> <p>We agree with the comment within the Sustainability Appraisal (SA) (page 17) that ‘the Vision does not make any reference to adapting to the effects of climate change’ including flood risk. However we feel this could easily be incorporated within the growth and regeneration paragraph of the Vision.</p> <p>In section 5.1.2 it is concluded that there are ‘incompatibilities that were identified between the Local Plan objective for ‘homes’ and the SA objectives for ‘water’ [...], as new housing will inevitably result in increased demand for water resources.’ We agree that meeting the housing needs (and other development) for Dacorum will increase the pressure on water resources. A good water resources policy will help to alleviate some of this pressure.</p> <p>We are pleased to see that in all options, the housing capacity can be met without developing within Flood Zones. A good Flood Risk policy should be incorporated into your Local Plan to address any windfall development that may come through and the redevelopment of existing sites within the flood plain.</p>	Noted

<p><u>Historic England</u></p> <p>Whilst we support the approach, and consider the scope of the text appropriate and clear, the SA outcome with regards to the effect of each of the growth options upon the historic environment is uncertain. We would agree that at this is probably an accurate conclusion in technical terms but until further information is provided regarding the impacts of the growth options we are unable to support one option over another.</p>	<p>A more detailed assessment will be undertaken for the SA of the Publication Local Plan.</p>
<p>We welcome reference to “setting” in historic environment section (part 8) of the SA Framework table in Appendix A.</p> <p>The SA Working Note does not reference any baseline information. We recommend that this is included and that it refers to the Extensive Urban Survey reports available on the Historic Environment Record as well as to local conservation area appraisals, design guides and master plans. These reports can provide a helpful foundation for the place strategies and site allocations. The Historic England data on Heritage at Risk provides data on grade I and II* listed buildings only. This should be supplemented by information on grade II listed buildings collected locally. Mapping historic environment assets at a strategic scale can be difficult but we suggest that conservation areas can be readily included.</p> <p>We note that the SA identifies that some developments may have the potential adversely affect known or undiscovered heritage assets is recognised. The appraisal of the suitability of sites should be informed by archaeological evaluation, where potential archaeological interest is identified.</p>	<p>Baseline information is included in the Scoping Report which was cross-referenced from the SA Working Note.</p> <p>The SA Report will include the baseline information.</p>
<p>We are pleased to see that the historic environment is referenced as a key sustainability issue and opportunity in the SA Working Note. Objective SA8 relates to the historic environment but it is recommended that the word “maintain” is replaced by “conserve”.</p>	<p>Historic England did not provide a response to the consultation on the Scoping Report and therefore had not previously provided input into the SA Framework. Their response to this consultation is welcomed. The SA Framework will be updated</p>

<p>It is also unclear what is meant by the inclusion of the word “identify”.</p> <p>Sites being allocated should be done so with the implications for the historic environment from the outset in order for the sites to be sustainably located rather than identifying them at a later date within the SA. It also implies that only those elements of the historic environment identified in the SA or local plan process are considered. The framework objective should include reference to the settings of historic buildings, designated and non-designated heritage assets and archaeological sites.</p> <p>[Historic England also provided a range of generic advice relating to sustainability appraisal of Local plans. This has not been repeated here but will be taken into account in the future sustainability appraisal of the Local Plan]</p>	<p>to replace the word “maintain” with “conserve” and to reference to the settings of historic buildings, designated and non-designated heritage assets and archaeological sites.</p> <p>Dacorum BC will be looking in further detail at the individual sites as part of ongoing Greenfield Site Assessment and Urban Capacity Studies. This will include the consideration of the historic environment. The findings will feed into future SA work.</p>
<p><u>Chilterns Conservation Board – and individuals reiterating CCB’s comments</u></p> <p>The Chilterns Conservation Board broadly agrees with the analysis eg that the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc. In addition it would reduce pressure for development in the nationally designated Chilterns AONB and the setting of the AONB. We recommend using a standalone objective: "To conserve and enhance the natural beauty of the Chilterns AONB". This is because at the moment the AONB is covered only as part of SA9: "To conserve and enhance landscape and townscape character and encourage local distinctiveness". This is not giving "great weight" to the AONB (as required by NPPF para 115) and it does not establish a hierarchy setting out the relative importance of designations (NPPF para 113: "Distinctions should</p>	<p>The SA objectives have been developed through several rounds of consultation, for the previous SA/SEA of the Core Strategy and Site Allocations DPD and the new Local Plan SA/SEA. Reference to the AONB has always been as a sub-objective to the ‘Landscape & Townscape’ objective – and through this objective any potential effects on the AONB have been identified and assessed.</p> <p>We do not consider that having a separate objective for the AONB would give it more weight as the SA/SEA is just providing information to inform the development of the Local Plan. It is the Local Plan itself which provides the ‘distinction and weight’.</p> <p>Assessment of cumulative effects will be included in the SA Report and will be informed by the CCB guidance.</p>

<p>be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.") The Chilterns Conservation Board welcomes the coverage in the Issues and Options SA Working Note of the cumulative effects of development on the Chilterns AONB. Understanding and recognising these effects both within the borough and across the whole Chilterns AONB will be important in assessing the soundness of the emerging local plan. The Chilterns Conservation Board has adopted a new Position Statement: Cumulative Impacts of Development on the Chilterns, available at http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html which should be of assistance in the next stages.</p>	
<p><u>Chiltern Society</u> Our main concern with the Sustainability Appraisal is that the SA Objectives do not sufficiently recognise the presence of the Green Belt designation across a large part of the Borough. As the SA goes forward into further stages of the Plan, we would like to see an additional objective assessing impacts on the openness and permanence of the Green Belt.</p>	<p>The presence of Green Belt is a planning designations and is not a sustainability factor that is included in the SA Framework. Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies. This approach is consistent with all the previous sustainability appraisal on the Core Strategy and Site Allocations DPD. The SA Framework includes objectives relating to the conservation and enhancement of the landscape in the Borough which guide the assessment in relation to landscape issues. The SA Framework has been consulted on at several stages and there have been no requests to add objectives relating to Green Belt.</p> <p>Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies and will be further addressed in the Greenfield Site Assessment Study</p>
<p>CPRE</p>	<p>The assessment against the Biodiversity objective (SA1) identified where the potential locations for 'Green Belt Housing'</p>

<p>There are arguments put forward in the SA note that development in the Green Belt could offer benefits. An example of this (page 23 of the note) is where the scale of development in the Green Belt around the main settlements e.g. Hemel Hempstead, if sufficiently large, could “provide opportunities for the provision of Suitable Alternative Natural Greenspace (SANGs).” National guidance on taking land out of the Green Belt for development does not include balancing the costs and benefits. Current National Policy means applying NPPF paragraph 14. The new Local Plan will have to demonstrate that there are exceptional circumstances, in order to change Green Belt boundaries to accommodate new development and provide SANGs. We suggest that the retention of the Green Belt could have been included in the considerations of SA 11 Sustainable Locations in order to assess the impact of loss of green belt in the various options proposed. In this way, it would also have been possible to gain some idea of the cumulative effect of the loss of Green Belt across the various options.</p>	<p>had the potential to provide SANGs. The SA does not examine the relative costs and benefits.</p> <p>In relation to the suggestion to include reference to Green Belt in SA 11 Sustainable Locations, we do not consider this to be necessary.</p> <p>Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies and will be further addressed in the Greenfield Site Assessment Study</p>
<p>Herts Natural, Historic & Built Environment Advisory Team (NHBE)</p> <p>The Natural, Historic & Built Environment Advisory Team (NHBE) supports the inclusion of the historic environment as a key sustainability issue and opportunity in the sustainability appraisal working note. It is appropriate that historic landscapes as well as historic buildings and archaeological remains are included as issues. It is right that the impact of as yet unknown archaeological remains is recognised by the document. This is because they have the potential in some cases to be a constraint on development. With regards to landscape, there is reference to Green Belt. It should be clear that Green Belt is not a qualitative designation. Overall it is vital that options should seek to ensure that landscape character and quality is conserved and enhanced</p>	<p>Noted.</p> <p>Reference has been made to Green Belt in relation to the location of potential areas for development. We agree that Green Belt is not a qualitative designation and have therefore not included reference to it in the SA Framework.</p>

<p>, that the Chilterns AONB and its setting is protected from inappropriate development, and that landscapes of local value are recognised, protected and enhanced (as promoted within the National Planning Policy Framework, Chapter 11 Conserving and Enhancing the Natural Environment).</p>	
<p>Herts Ecology</p> <p>Herts Ecology In the Sustainability Appraisal Working Note, the 'updated' Sustainability Scoping Report directed to on the web site is dated March 2017 (not October 2017) and so comments refer to this document as it appears to be the only available document. It states the following in respect to biodiversity: '<i>... as the Core Strategy gets progressively older, there is a risk that the weight that can be accorded to such policies will diminish</i>'. Why? Unless all national legislation and guidance changes, it must be presumed that protected ecological resources will remain protected, as appropriate. To state otherwise undermines the principles upon which any environmental protection is based and consequently does not reflect sustainable development. Reference to this should be removed or qualified.</p> <p><i>'The new Local Plan will be able to ensure that development, beyond that already identified in the Core Strategy and Site Allocations DPD, is located having taken into account the biodiversity and geodiversity sensitivity of an area'</i>. The Local Plan identifies Wildlife Sites within development areas and significant new housing close to the Chilterns Beechwoods SAC and other SSSIs, with no mitigation or compensation detailed. This does not reflect sustainable development. Further details of mitigation or compensation must be outlined. The impact on the SAC from development in Hemel is noted, but not from development at Berkhamsted or Tring which are closer to the SAC. This does not reflect sustainable development.</p>	<p>The reference to weight of policies diminishing was made in relation to all the SA topics and was referring to the fact that once the Core Strategy was more than five years old and had not been reviewed, less weight would be given to the policies in the case of any appeals against DBC planning decisions. This will be clarified in the next update to the SA. The weight to be attached to policies over five years old was addressed in the original NPPF and revised and updated in the current (February 2019); the guidance is clear and historic interpretation was guided by extensive case law.</p> <p>The HRA of the Local Plan will assess the potential impacts of development in all areas of Borough on the SAC.</p> <p>Dacorum BC will be looking in further detail at the individual sites as part of ongoing Greenfield Site Assessment Work. This will include the consideration of biodiversity. The findings will feed into future SA work.</p>

<p>Berkhamsted and Tring proposals need to be included as having a potential impact.</p>	
<p>Herts Ecology</p> <p>In respect to landscape issues and opportunities, no mention is made of the declining rural infrastructure of farming diversity (livestock farming mixed farming and forestry activities) which helps to maintain the character of the landscape and its biodiversity and which development and development pressure degrades. To state the character, diversity and local distinctiveness of all the landscapes of the Borough will be maintained, enhanced or restored, in particular the Chilterns AONB (2.5.4) – with no realistic understanding or supportive measures to achieve this – is meaningless. Consequently this does not support sustainable development. A reference to maintaining and enhancing the land management practices required to achieve this needs to be included.</p>	<p>Farming and forestry activities are outside the scope of the Local Plan.</p> <p>The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.</p>
<p>Herts Ecology</p> <p>The Sustainability Appraisal Working Note states (1.4) at this Issues and Options stage there is not the necessary level of Plan detail to undertake HRA. Whilst we acknowledge details need to be agreed before a full HRA can be undertaken, it is naive to believe that the outline extent of ALL options for proposed development will not have an impact on the SAC habitat given the proximity of the accessible locations to the majority of net proposed development in Dacorum. Given it already considers the HRA for the Core Strategy and Site Allocations DPD did not identify any significant issues for any European sites the current proposals are wholly inconsistent with this. If this is not adequately addressed, this will be unsustainable. Consequently the text must reflect this additional local pressure and highlight the need to properly consider this.</p>	<p>It is acknowledged that the Local Plan has the potential to have effects on the SAC. However, given that effects will be dependent on the proximity of new development to the SAC and not just from the quantum of development Borough-wide, HRA will be undertaken when there is more certainty of the locations for the new development.</p>

<p>Herts Ecology</p> <p>Regarding paragraph 2.3, SA / SEA and Local Plan issues. Table 2.1 Biodiversity: In addition to issues 1, 17 and 23, we consider biodiversity is affected by the following additional issues: 2, 3, 4, 19, 20 and 24. This is because biodiversity is an organic, generic process directly affected by these issues as a by-product of their implementation, not simply an issue for specific sites only. These should also be included. Consequently Table 2.2 Biodiversity also fails to reflect how any of the issues or opportunities are to be addressed – there is nothing about land management which created and now (rarely) maintains the ecology we value to begin with. This is unsustainable and should be recognised and referred to within the text. Table 2.2 Landscape – see above. This does recognise declines in traditional management practices – and should also include forestry. Text must reflect how opportunities can be created and developed.</p>	<p>To be taken into account in the SA Report.</p>
<p>Herts Ecology</p> <p>Table 3.1 contains numerous errors, including: SA1 biodiversity is related to 1 Quality of Life in respect of access to and experience of nature and natural environments; SA1 is wholly related to 2 climate change – impacts on migration, pollination, seasonal changes to weather patterns etc; SA1 is directly related to 7 land use – forestry and farming. SA1 is related to 9 a vibrant economy, at least in terms of agriculture and forestry; SA1 is directly related to 13 over-abstraction of water as a basic resource requirement; SA1 is related to 14 flood risk issues – natural flood relief, SUDS and other hydrological issues Much the same can be said for SA2 (Water) and SA9 (Landscape), The links between these issues must be recognised in the Working Note to enable a proper understanding of the issues which impact upon the natural environment to be considered and addressed.</p>	<p>To be taken into account in the SA Report, taking into account the scope of the Local Plan and its SA.</p>

<p>Herts Ecology</p> <p>Regarding Section 4.3 Issues. SA1 Biodiversity refers to Suitable Alternative Natural Greenspace (SANGs) for the SAC being dependent upon the extent and location of growth options. This may be true but if biodiversity is affected anywhere the aims of NPPF seek no net loss and enhancements, over and above impacts just on European sites. The required development will impact upon greenfield land and active farms, both of which will degrade ecology and the means to maintain it. Furthermore, for 26 of the 30 sites selected it is stated that ecological issues are yet to be confirmed. This means these sites cannot properly be assessed in this respect at this stage. Currently there are some surprising inconsistencies in conclusions drawn given the appraisal criteria. Given ALL developments affect greenfield sites, there will, be, by default, be a negative ecological impact of one form or another. Consequently, the Sustainability Appraisals must be considered with due caution pending further ecological information. Furthermore, the practical provision of 'living landscapes' providing larger, joined-up sites and corridors is wholly without any expression in the plan, which will also serve to further isolate some sites.</p>	<p>The SA for all options identifies the potential adverse effects on biodiversity.</p> <p>The sites included in the Schedule of Site Appraisals are not 'selected'. They are the large sites in the Green Belt which have been put forward by developers and landowners for either housing or employment uses.</p>
<p>Herts Ecology</p> <p>Also, the pressure on the SAC is because of its existing character of mature woodland and open spaces. Local SANGS will not replicate this – although they may help to deflect some immediate pressure. Certainly, without any alternative provision, this will lead to a continued loss of biodiversity and impact on the SAC and is not sustainable. This should also be recognised within the Working Note document as necessary.</p>	<p>The ongoing SA and HRA will take the potential effects on the SAC into account.</p>
<p>Herts Ecology</p>	<p>Noted. To be updated in SA Report.</p>

<p>Regarding paragraph 3.5.3, the reference to Tring Park as being part of the SAC is wrong. It should either be just 'Tring' or 'Tring Woodlands' which is the constituent SSSI name.</p>	
<p>Watford Borough Council</p> <p>The cross boundary issues highlighted cover the strategic issues neighbouring authorities will need to confront as the Dacorum Local Plan and those of the respective local authority areas in south west Hertfordshire, are prepared. It will be important to recognise that each district will have different opportunities and limitations to address strategic issues in the long term as part of future collaborative discussions.</p>	<p>Noted.</p>
<p>Individual respondent</p> <p>The level of development proposed will have significant adverse effects for all the environmental objectives. This is not reflected in the SA Working Note.</p>	<p>The SA identified adverse effects associated with new development. For the majority of the environmental objectives these effects are not considered to be significant.</p>
<p>Individual respondent</p> <p>The sustainability considerations have failed to acknowledge the much lower sustainability of the distribution C options/spreading the development away from the Borough's towns.</p>	<p>The assessments for Option 1c and 2c both identify that the option will result in increased travel to access main services.</p>
<p>Individual respondent</p> <p>Insufficient emphasis on the use of brownfield sites, which must be used even if difficult and expensive. What price the loss of irreplaceable countryside? 2- Insufficient argument against development in the Green Belt. 3- Lack of requirements for offsetting biodiversity loss. Merely mention possibility in some areas – but this seems impossible because any potential areas would be swallowed up by development. 4- Option 3 should be rejected outright.</p>	<p>All the options require the delivery of the c.10,940 homes on existing and planned sites that are consistent with existing planning policies (the Urban Capacity sites). This will maximise the use of urban brownfield sites.</p>
<p>Individual respondent</p>	<p>Assessment of cumulative effects will be included in the SA Report.</p>

<p>The cumulative effects of developments across Dacorum as a whole have not been assessed, thereby any conclusions made are made at best suspect, at worse invalid.</p>	
<p>Individual respondent Sustainability Appraisal Working Group has adequately addressed the issues relating to greener transportation and the health and socialisation benefits of getting people walking and discouraging car ownership. Moving to electric vehicles produces other damage and can accelerate climate change.</p>	<p>Noted</p>
<p>Individual respondent In the assessment of options of housing growth the various options considered for impact are those given by the council. No attempt has been made to consider other development options and thus it is only an impact assessment on the options stated NOT on the scale of housing suggested. In detail some the assessment of SA9 Landscape/townscape seems to underestimate the scale of the development proposed in the green belt around Tring, when that green belt is very close to the Chiltern AONB. AONBs do not exist in isolation but rely on a surrounding "green" area to set them in an appropriate environment. The Sustainability Assessment seems to ignore this in SA9.</p>	<p>The SA has assessed the options for growth which the Council considered to be reasonable alternatives. Further assessment on the setting of the AONB will be undertaken at the next SA stage.</p>
<p>Individual respondent The SA mentions the potential impact of Luton Airport expansion only in terms of surface transport. Its noise impact on dwellings ought to be considered, although this may require plans to be revisited once the airspace redesign options become clearer. The recent announcement by LLAL of a vision 2020-2050 further doubling of capacity has heavy implications for noise, pollution and surface transport.</p>	<p>The expansion of Luton Airport is outside the scope of the Local Plan. However the SA will take account of the potential cumulative effects in the SA Report.</p>

<p>Individual respondent</p> <p>The overall analysis ignores the impact of the combined plans throughout Dacorum, and does not give sufficient detailed consideration to the local impact of the individual potential developments. Given the underinvestment in infrastructure in Dacorum, the lack of road, parking and train capacity for example, the combined impact of the number of new homes proposed in Dacorum will significantly negatively impact the standard of living of the existing inhabitants of Dacorum.</p>	<p>Assessment of cumulative effects will be included in the SA Report.</p>
<p>Individual respondent</p> <p>Whilst I broadly agree with the conclusions reached I am not convinced that sufficient weight has been attached to the negative impact of the proposed Options.</p> <p>The Vision includes that the market towns and large villages will provide all necessary services for their communities and surroundings whilst recognising and valuing the differences in character of each place.</p> <p>Perhaps the key objectives outlined are: To enable convenient access between jobs, homes and facilities, minimise the impact of traffic and reduce the overall need to travel. To conserve and enhance the function and character of the villages and countryside. To ensure the effective use of existing land and previously developed sites. To maintain commercial enterprise and employment opportunities in the market towns and large villages.</p> <p>Kings Langley already provides all necessary services for the existing community and any proposal to significantly expand the size of the village must clearly fail to recognise and value the character of the village and its surroundings.</p> <p>Any expansion of the village for new residential units or any significant new commercial sites will severely impact the already</p>	<p>The SA Working Note for the Schedule of Site Appraisals identified the main constraints and opportunities associated with each site considered. This included effects on the historic environment.</p> <p>The next stage of SA will consider the effects of the Local Plan in more detail than was the case for the Issues and options stage,</p>

grid locked traffic situation in the High Street as well as in Apsley. The overall need to travel could not be reduced by the adoption of any of the proposed options. And school journeys are also likely to increase despite proposals for new schools. Indeed the outcome might be even more school buses and private cars bringing students from outside the village rather than improving education facilities for local residents. Any new residents are likely to travel to Hemel Hempstead, Watford or St Albans for shopping and to Luton, Stansted or Heathrow for holiday and business flights. And the increase in heavy haulage vehicles supplying local shops, businesses and new commercial sites must not be overlooked in addition to increased journeys by couriers and online shopping services and local buses.

The negative impact on water quality and quantity and impact on soils is to some extent recognised. But flood risk is hardly mentioned and whilst mention is made of possible impact on historic sites little recognition is given to the impact of investigating these sites and the general unsuitability of historic sites for new building developments if the historic heritage is valued and preserved and if character of the village and its surroundings are truly recognised and valued.

The Report says "The proposed Vision for the Borough sets a general aspiration for how development will meet the needs of the population whilst at the same time protecting the environment and character of the Borough. This Vision has therefore been identified as being compatible with the social and economic SA objectives and with the majority of the environmental SA objectives"

But a "general aspiration" falls far short of ultimate achievement. It is little more than a speculative aim for the future without any possible real hope of achieving the stated Vision. And protecting

<p>the character of the Borough as whole does not necessarily mean that the character of individual market towns and villages can be protected.</p> <p>But the Report does say, "Potential sites will be assessed during a later stage of the SA process at which point the current high levels of uncertainty will be reduced".</p> <p>We must hope that eventually the impossibility of the proposals for the green belt on the outskirts of the large villages will be recognised as well as the impact on the historic sites in Kings Langley and other negative impacts.</p>	
<p>Individual respondent</p> <p>The assessment has not included the impact of large scale development in neighbouring Boroughs that adjoins the Dacorum boundaries, which could have an impact, detrimental or otherwise.</p>	<p>The potential cross-boundary effects from implementing the Local Plan will be identified and assessed in the SA Report.</p>
<p>Individual respondent</p> <p>The Sustainability Appraisal analysis is highly inconclusive and subjective. It's conclusions do not support the higher growth options for example there is no cost analysis</p>	<p>The SA analysis reflects the 'high-level' nature of the Issues and Options document. A more detailed assessment will be provided in the SA Report. Cost analysis is not a requirement for SA/SEA.</p>
<p>Individual respondent</p> <p>There seems to be no thought given to the lack of infrastructure that exists in the village locations.</p>	<p>The SA identified that new development in the villages could put pressure on existing services, but it would also provide opportunities for improvements to the existing infrastructure (e.g. schools, healthcare, open space).</p>
<p>Individual respondent</p> <p>I vehemently disagree with 5.1.3 and the recommendation that Option 3 "performs the best" and it "could put strain on existing services and infrastructure, to the detriment of all residents". There is no "COULD". Quite simply, it WILL. It will increase pollution, it will reduce air quality, it will increase traffic, it will put major strain on local services, it will (in some areas)</p>	<p>In relation to the environmental objectives para 5.1.3. identifies that Option 3 performs the worst.</p>

<p>cause flooding where soil is replaced with concrete and rainfall will not be able to soak away. It will concrete-over huge areas of open spaces, green belt, farmland, and hedgerows. It will kill local wildlife. I am not against sustainable development of Brown Field sites, but I am strongly against concreting-over our Green Belt land. Land that was designated 'protected' for the following reasons... 1. To check the unrestricted sprawl of large built-up areas 2. To prevent neighbouring towns merging into one another 3. To assist in safeguarding the countryside from encroachment 4. To preserve the setting and special character of historic towns 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land Developing on Green Belt land is a short-term solution that will forever destroy our region, mean towns merge seamlessly with the next, destroy historical villages (e.g. Kings Langley) and kill our communities. Whilst this document does list the negative impact, it's shocking that Option 3 is even an 'option'.</p>	
<p>Individual respondent Table 2 Summary of Assessment of Growth Options in section 4.3 on page 21 of the notes shows that all options are negative for all environmental SA Objectives. Clearly we need new options that are positive for the environmental objectives. Or are we really prepared to say - the environment is vital to all our lives, but let's put a bulldozer through it anyway?</p>	<p>Built development on greenfield sites will inevitably have some adverse effects on the environment. Local Plan policies will help to minimise any such effects and where possible provide enhancements.</p>
<p>Individual respondent The Sustainability appraisal provides a reasonable general framework but unless the Key sustainability issues and opportunities and the framework objectives are properly applied to specific site options in the plan, then the conclusions are meaningless.</p>	<p>The SA Working Note for the Schedule of Site Appraisals assessed the specific sites. Further such assessments will be undertaken for the SA Report.</p>

<p>Individual respondent</p> <p>Bearing in mind that all options for meeting forecast housing growth are considered to have a negative impact to varying degrees it will be essential to scrutinise very closely the merits of individual sites before allowing release from Green belt.</p>	<p>The SA Working Note for the Schedule of Site Appraisals assessed the specific sites. Further such assessments will be undertaken for the SA Report.</p>
<p>Individual respondent</p> <p>Air Quality doesn't consider flight paths from Luton airport or the impact of extra cars on local roads</p>	<p>The assessment of the options against the Air Quality Objective (SA5) identified the effects relating to increased traffic.</p> <p>In relation to flight paths from Luton Airport it is not considered that emissions from aircraft flying over the Borough would give rise to any effects on local air quality.</p>
<p>Individual respondent</p> <p>I fully agree with your conclusion that: "In general terms the option for the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc., that would result from an increased local population". Indeed, to go further, I believe that option 1B is the only viable option in view of the environmental and infrastructure issues.</p>	<p>Noted</p>
<p>Individual respondent</p> <p>The work by your consultants is superficial, presumably based on some form of standard template and lacks any detailed analysis of the areas in the Borough and the impact individual sites may have there. For instance development may have a beneficial economic effect but the significance of that will vary according to the strength of the existing economy in that location, meaning there are degrees of benefit. Such analysis has not been applied, rather a blanket assumption that development is good. Government policy is to maintain Green Belt boundaries unless there are exceptional circumstances. Your consultants do not</p>	<p>The SA analysis reflects the 'high-level' nature of the Issues and Options document. A more detailed assessment will be provided in the SA Report.</p> <p>Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies and will be further addressed in the Greenfield Site Assessment Study</p>

<p>seem aware of this, which may explain in part why they consider development of the Green Belt brings environmental enhancements. Most would argue the opposite. Much of what they consider could be developed will impact directly against the 'Vision' for the Borough</p>	
<p>Individual respondent Whilst the document highlights the key requirements and reports covering sustainability - it does not provide the full information to make informed decisions. Greater work is required to fully appreciate the impact developments will have on all aspects of the planning information and proposed sites.</p>	<p>The SA analysis reflects the 'high-level' nature of the Issues and Options document. A more detailed assessment will be provided in the SA Report.</p>
<p>Individual respondent The Sustainability Appraisal working note appears to have a number of conclusions - the only positive one relating to policies which will be included in the Local Plan. I have no problem with this conclusion provided that the policies are followed and not just relegated to words included in the document to tick certain boxes. However the main statement in the conclusion to the working note states that there is a large amount of uncertainty relating to the prediction of the likely effects against sustainable objectives and conflicts between them which the council has not yet addressed. The document also concludes that all the options will have a negative impact on water supply and loss of soil – the council needs to fully investigate these matters further before proceeding with any local plan</p>	<p>The SA analysis reflects the 'high-level' nature of the Issues and Options document. A more detailed assessment will be provided in the SA Report.</p>
<p>Individual respondent The current state of the infrastructure is worse than the assessment, hence considering extra building is more problematic than has been considered.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>

<p>Individual respondent</p> <p>This has not been thoroughly thought through and is incomplete. It focusses on building on green belt and farmland in and between villages. It does not adequately assess the impact on infrastructure or services which are almost at breaking point already. Medical services are being moved out of Dacorum yet it is growing faster than more parts of the country.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments.</p>
<p>Individual respondent</p> <p>Much of the document makes sense but it grossly under-states the impact on infrastructure pressures which are already a problem and will have a great impact on quality of life even with already planned or approved development. Traffic through Tring and Berkhamsted is already painful and parking at stations, supermarkets and near town centres often impossible.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments.</p>
<p>Individual respondent</p> <p>While agreeing that the best option is the one with the lowest number of dwellings, the Sustainability working Notes are superficial and do not place enough weight on the lack of infrastructure in the decorum area to even cope with the level of development indicated in option one. This is particularly true in the case of roads and rail capacity. Additional housing will exacerbate the existing issue of Hemel Hempstead becoming a commuter town for the greater London area which is not in the interests of the existing communities. In addition sufficient weight is not given to the social impact of further development, for example the detrimental impact of any further development around Piccotts End - a hamlet of great historical and archaeological significance with a thriving local village community which in itself has attracted residents to the area</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments.</p>

<p>Individual respondent</p> <p>The Working Notes correctly state that: Over abstraction of water resources is an issue in the region There are issues relating to the future capacity of waste water treatment works serving the area Dacorum's increasing population will lead to additional pressure on secondary healthcare services in the Borough and also the County as a whole. The increasing proportion of older people in the Borough's population is likely to put pressure on secondary healthcare needs, as they are likely to utilise healthcare services more than others All the key roads in south-west Hertfordshire are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy Bus services are not adequately linked between Hemel Hempstead rail station, Maylands and Hemel Hempstead town centre I disagree with the conclusions because the Notes do not indicate the impact that each of the proposed options would have upon these key constraints, which are already congested or approaching local limits. In particular, Kings Langley (where I live) is currently undergoing expansion, with new accommodation for 40 elderly people opening in the High Street in 2019, and another elderly care home proposed in Hempstead Road. Both these new constructions will increase existing pressures on already congested local parking and traffic movement. Other constraints in Kings Langley include: * Severe traffic congestion on A41 and A4251 during rush hours (see Q12) * Local schools and health services operating at full capacity</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>
<p>Individual respondent</p> <p>Little to no evidence of a holistic approach to transport and infrastructure planning. I would expect to see detailed input on education resources for each area including assessment of</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>

<p>current capacity and expected local growth for housing options, Road capacity and traffic flow, Rail link capacity, Doctors, Parking in the village</p>	
<p>Individual respondent The Sustainability Appraisal doesn't fully address how such huge developments will impact the existing inadequate road infrastructure.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>
<p>Individual respondent The conclusions are good ... interestingly it points out the transport infrastructure as being under stress ... that is even before building plans are implemented</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>
<p>Individual respondent I do not think that adequate focus has been given to the impact on the transport infrastructure of building homes in this district. Any developments of 50+ houses within an area will have a major impact on the road capacity. Routes into Hemel Hempstead are already gridlocked, even outside peak commuter times. This congestion is experienced throughout the borough. There is reference to improving use of public transport but no serious consideration has been given within the sustainability plan. Indeed, bus routes have been reduced and fares are prohibitively high. No mention has been made of providing adequate cycle routes around the borough. The report states that current provision for cyclists is adequate. Where is the evidence? People do not cycle as it is too dangerous with the high levels of traffic on the roads. There is no separate provision for cyclists, apart from the Nicky line, which is only useful for recreational cycling as it does not join up with other cycle routes.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>

<p>Individual respondent</p> <p>The Sustainability Appraisal Working Notes have many lacunae. I merely point out the inability to deal with questions of getting people around. Quite apart from the inadequacy of the current road system, I have no confidence in the ability of Dacorum or Herts County to provide suitable and timely provision in this area. I have even less confidence in London Midland to address the problems of car parking at their stations in Dacorum, although I suppose they might have been booted off the franchise by then.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>
<p>Individual respondent</p> <p>The impact of the increased housing provision proposed does not take any account of improvements to infrastructure (private and public transport, utilities, health, education etc. and without such consideration, the Local Plan cannot be 'sustainable'. The conclusion that highest level growth option would provide a population size that would help to support the local economy and the new large developments would provide new facilities and infrastructure for use by the Borough as a whole is not supported by evidence. Current evidence is that very little infrastructure is provided with new developments and existing facilities therefore come under increasing pressure. No evidence is provided to support the statement that development envisaged by Option 3 would provide "the range of homes to meet future needs of the Borough, particularly in relation to affordable housing." Provision of new social housing in Berkhamsted has been very poor and it is unlikely that this situation will change without a change in government policy.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p> <p>Option 3 would provide a level of new housing that would meet the needs identified for Dacorum – including affordable housing.</p>
<p>Individual respondent</p> <p>It does not consider the social and economic elements of sustainability sufficiently enough. Just creating some green space to tick boxes should not be sufficient to push forward plans for</p>	<p>The SA examine the potential effects of new development against environmental, social and economic objectives which have been subject to several rounds of consultation. They are</p>

<p>constructing thousands of new dwelling in green belt. The environment impact of introducing thousands of extra vehicles to the roads right next to the Chiltern AONB should also not be discounted.</p>	<p>therefore considered to be appropriate for undertaking SA on the Local Plan.</p>
<p>Individual respondent</p> <p>The TRL Issues and Options Sustainability Appraisal Loss of Greenbelt in relation to its aim of preventing urban sprawl has not been included in the list of SA Objectives being considered. It is only made a passing reference to in SA9 and SA12. Insufficient consideration has been given to the potential adverse effects on the community resulting from its loss.</p> <p>The TRL Sustainability Plan and Options Plan makes no reference to designated Greenbelt land and how development of it will cause harm to the Greenbelt. Section 9 of NPPF indicates that the Greenbelt is fundamental to preventing urban sprawl (Section 79). Local Authorities have a responsibility to protect the Greenbelt and are only allowed to change it via revision of their Local Plan (Section 83) and only in very exceptional circumstances. They need to ensure that sufficient weight (Section 88) has been given to protecting Greenbelt land. Local Authorities should regard the construction of new buildings on Greenbelt as being inappropriate (Section 89). As the majority of the sites that are being proposed will involve development on Greenbelt land, this is considered be a serious omission from the TRL Sustainability Plan and Options Plan</p>	<p>Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies and will be further addressed in the Greenfield Site Assessment Study</p> <p>The environmental effects of releasing Green Belt land for housing have been picked up in the assessment.</p>
<p>Individual respondent</p> <p>The report's conclusion is: In general terms the option for the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc., that would result from an</p>	<p>Noted</p>

<p>increased local population. Kings Langley is at saturation point and any future housing development must be limited to the identified brownfield sites.</p>	
<p>Individual respondent The sustainability documents do not cover the necessary impact statements of plans seen as a whole or in light of others forthcoming. Further they have no status for enforcement on developers.</p>	<p>The SA analysis reflects the ‘high-level’ nature of the Issues and Options document. A more detailed assessment will be provided in the SA Report. Assessment of cumulative effects with other plans will be included in the SA Report.</p>
<p>Individual respondent The council’s sustainability plans are based on assumptions that a good proportion of new dwelling residents will commute to work either by walking or cycling. This is unrealistic for Kings Langley where there are very limited employment opportunities locally. Public transport at rush hours is beyond capacity (primarily trains to London). The fundamental sustainability assumptions for the development plans are flawed. The council should perform a study of how residents at each of the proposed development sites commute and use these patterns as the building blocks to assess sustainability. I do not see any evidence that this has been performed. Given the dependence on cars as a mode of transport in the borough, the councils own plans to reduce pollution in areas that it has identified as being outside of European clean air standards will not be achievable.</p>	<p>The SA identified that the options/sites with access to public transport, or where public transport improvements would be provided, were the most sustainable. Issue 5 in the Issues and Options document considered the issues relating to roads, transport and accessibility that should be addressed in the new Local Plan. The SA will consider these issues in more detail as the Plan is developed further.</p>
<p>Individual respondent This exercise is flawed because it doesn't consider the cumulative effects of multiple sites. Green belt development should be absolutely minimised and AONB prohibited. This is not a NIMBY argument, as some relaxation is possible, but not as much as some of the options suggest.</p>	<p>The assessments of the options considered the effects of growth at the different settlements in broad terms and was only site specific in relation to whether SANGs could be provided. It therefore looked at overall effects. See responses to Question 46 in relation to the assessments in the SA Working Note for the Schedule of Site Appraisals.</p>

<p>Individual respondent</p> <p>The appraisal assessments have been inappropriately made to achieve the end goal of development of greenbelt sites and the further loading with new development of an area that is already stretched beyond its capacity if it is to retain the integrity of the fine balance that exists between residential and greenbelt. This fine balance is what draws its attractiveness as a beautiful and contributing region relative to some of its neighbouring areas where over-development and unscrupulous land-grabs have been made into greenbelt zones. The DBC is tasked and paid by the residents to PROTECT - not to exploit the area.</p>	<p>The SA identified both positive and negative effects related to the options included in the Issues and Options document.</p>
<p>Individual respondent</p> <p>The conclusions seem to suggest that bulldozing the green belt is somehow beneficial to the environment and the economy. The green belt was created for a reason and has a lot to do with the prosperity and popularity of the areas near it. Destroying it will not enhance it!</p>	<p>Overall, the assessments identified adverse effects against the environmental SA objectives. However where development of some sites could provide some environmental enhancements, these too were identified.</p>
<p>Individual respondent</p> <p>Any development on green belt only has a negative affect it cannot have environmental enhancement or improve quality of life. Likewise the increase water consumption and issues of drainage and sewerage have not been satisfactorily considered</p>	<p>The assessments against SA2 (Water) and SA7 (Resource efficiency) identified the potential effects relating to water supply and waste water treatment.</p>
<p>Individual respondent</p> <p>I agree with the statements in the report conclusion that "the option for the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc., that would result from an increased local population." and "The assessments did however identify that the high levels of growth under Option 3</p>	<p>Noted</p>

<p>could put strain on existing services and infrastructure, to the detriment of all residents, both existing and new." Therefore I am greatly favour of controlled and sustainable growth best represented in options 1</p>	
<p>Individual respondent</p> <p>No. All options involve too much building on irreplaceable Green Belt farming land. In connection with option 3 it is stated naturally enough that it performs the worst against the environmental objectives. But I do not accept the supposed benefits of this option could meaningfully compensate for the huge damage it would cause. All future building should be within the envelope of existing settlements on Brownfield Land with the vast majority of this in Hemel Hempstead. Dacorum is unfortunate in having only one large town. But nevertheless if we are to have large numbers of additional houses inflicted on us, the least bad option is for this to occur on Brownfield sites with much increased conversions of underused commercial or other sites to housing, & with greatly increased density & heights to buildings. Unfortunately the smaller towns have already suffered very badly from a large increase in numbers without any significant improvement in infrastructure: roads, Schools & medical facilities. If the increased numbers cannot be accommodated on town Brownfield sites, it is imperative that a new settlement be considered at this stage & suggest Bovingdon Airfield, before any more irreplaceable countryside is lost.</p>	<p>The SA does not claim that the benefits that could be associated with new development would compensate for the overall environmental effects.</p> <p>All the options require the delivery of the c.10,940 homes on existing and planned sites that are consistent with existing planning policies (the Urban Capacity sites). This will maximise the use of urban brownfield sites.</p>
<p>Individual respondent</p> <p>I believe the report does not address the brief as stated and as such I do not agree with the conclusions reached. The first part of report section 2.2 Dacorum Local Plan and Options document "Shaping growth in Dacorum" notes six topic areas: The role of our Towns, Villages and Countryside Homes Our Economy Our</p>	<p>The SA objectives have been developed to "<i>structure and inform the assessment of the Local Area Plan through all stages of its Development</i>" [emphasis added] not "<i>to structure and inform the Local Area Plan through all stages of its Development</i>" as misquoted in this representation.</p>

Environment Infrastructure Growth Options This section identifies 28 issues appertaining to the above 6 topics. Under section 2.3 it is noted that "it has not been possible to undertake an assessment on the local plan issues...." Under section 2.4 SA Framework are identified 15 objectives which in no way address the six key topic areas of the local area plan and options document. It is further noted that "these SA objectives will be used to structure and inform the Local Area Plan through all stages of its Development". It can be clearly seen that SA1 to SA15 does not reflect the Dacorum Local Plan, the key points of which have been completely ignored, in particular: The Role of Our Towns, Villages and Countryside Infrastructure Growth Options As such the criteria used in the report and therefore the conclusions/recommendations reached are flawed. The report does not address the Economic or Social Community aspect of sustainable development. The report should be rejected and rewritten to consider carefully the Economic and Social Community in particular to address the Local Plan key topics of The Role of Towns, Villages and the Countryside Our Economy Infrastructure Growth Options

Individual respondent

All these options require some loss of greenbelt; I think the SA/SEA understates the effect that building approx. 11k new homes in Dacorum would have on the environment, not only directly through loss of green space and good agricultural land/woodland, but with increase in population and necessarily traffic. The roads around Dacorum are already struggling to cope, with main arterial roads M1, M25 often at a standstill (knock on effect of air pollution). Much of the area is serviced by smaller A roads and country lanes, not designed to cope with heavy traffic. Making reassuring noises about cycling/walking fools no one, there is no evidence of safe routes being created. People will

The SA identified the potential adverse environmental effects of providing additional homes in the Green Belt locations. This included effects from traffic in relation to local air quality, greenhouse gas emissions, historic environment and impacts on communities.

<p>inevitably use their cars to travel and with a conservative estimate of 2 per household, that's 22k extra vehicles.</p>	
<p>Individual respondent I agree with all of the key environmental and sustainability issues mentioned in the document but I have yet to see any evidence produced that the Dacorum area actually needs anywhere near the number of houses listed in the three options. I disagree with the findings that only Option 3 will impact adversely on existing residents, water quality, soil, infrastructure, environment, air pollution, climate change, schools etc. ALL of the options for additional housing in Dacorum will adversely affect an already overloaded road and rail network. As for the proposals for more housing in the Kings Langley area, new housing means more people with cars, despite the good intentions of planning for cycling, bus transport, hence the need for extended car parking at Kings Langley train station. People have not given up their love affair with the car despite the necessity to do so, I would be surprised if the Air Pollution readings along that part of the A4251 did not already match those in London Road, Apsley which I believe exceed Air Quality standards and probably make a mockery of your Air Quality Action Plan.</p>	<p>The SA identified potential adverse effects on the environment from all the options, not just Option 3. The assessment also identified the implications of additional development on local air quality.</p>
<p>Individual respondent It is difficult to agree with a conclusion that comes up with it being an opportunity for environmental enhancements if we were to take the highest level of growth. That highest level of housing growth would have destroyed swathes of the local Green Belt.</p>	<p>The SA identified the potential adverse environmental effects of providing additional homes in the Green Belt locations.</p>
<p>Individual respondent The document presents a barrage of statistics and tables; I comment as one who actually lives in the borough and for 15 years has had to cope with the ever-increasing challenges of more and more grid-locked roads, an appalling rail franchise,</p>	<p>The SA identified potential adverse effects on the environment from all the options.</p>

<p>totally inadequate station car-parking, poor public transport around Hemel Hempstead in particular, severely downgraded health provision and the erosion of protected Green Belt land, with consequent impacts on light pollution, air quality, wildlife and the natural environment. Given all of the above, any proposal to flood the area with large-scale additional building - bringing about a huge increase in the local population to compete for ever more limited resources - cannot be welcomed. The document's optimism about these impacts seems misplaced, to put it mildly.</p>	
<p>Individual respondent I agree with the conclusions including that Option 1 is best option as assessed using this framework.</p>	<p>Noted</p>
<p>Individual respondent I take particular exception to the methodology and criteria used in the Sustainability Appraisal Working Note as being overly complex and there is no apparent weighting between the criteria. At the macro level the error of using this ill-conceived methodology is compounded by applying it to seriously biased and incomplete As examples; Option 3 e.1000 houses p.a. should never have been included as it has no basis. The choices between the settlements are misleading and appear to be purposefully divisive within the remaining two Options. This can be illustrated by a comparison of Option 1C (Focussed on 3 towns) and 2C (Spread more evenly across the Borough). The difference between Option 1 and Option 2 is that an additional 3,655 houses are being built on Green Belt However despite this huge difference in house building levels, there is no difference between Option 1C and 2C of the house building levels or Green Belt release in Berkhamsted or Tring while Hemel coincidentally</p>	<p>The methodology is broadly in line with all previous sustainability appraisals undertaken for local planning in Dacorum since 2006. The SA Working note provides an assessment of the options that were selected by the Council as being reasonable alternatives. The SA Working Note (Table 4) also provided the reasons as to why the Council had rejected other alternative growth distributions. It is not the role of the SA to determine what is and what is not a reasonable alternative – this being the decision of the Council.</p>

sees a reduction of 3,450. I believe this should disqualify both options as they are obviously untenable.

At least 3 major Options which are relevant were dismissed for dubious reasons. Namely there should be sensitivity Options for estimated Gorhambury impacts; a major development of 3000 houses by 2036 (almost 20 years away); and building within the existing urban capacity of 476 houses p.a. which is still a significant increase on the current Plan, all of which have significant repercussions on the timing of Green Belt release. The automatic acceptance of 758 houses p.a. is misguided and unrealistic and assumptions should be re-visited. Additionally focus should be on Hemel achieving its existing targets without stressing all other settlements beyond capacity.

In summary I believe a more constructive, balanced and realistic Option should have been presented instead of the biased developer led options. Prior to any further house building in Berkhamsted, it is imperative a credible and deliverable infrastructure plan with an associated timetable should be prepared in order to determine how current and future capacity constraints can be overcome in the next 20 years and should set future house building limits. If not the panic build of a belated Multi Storey Car Park in an unsustainable location will continue.

When applied at the Site specific level, at least 6 out of the 15 criteria are useless differentiators' e.g. Climate Change, Housing, Sustainability prosperity, Employment & Skills. As mentioned the rainbow coloured scoring system introduces a level of complexity which negates meaningful conclusions from being made. Having had a long business career most issues can be categorised as positive, neutral or negative (red, amber, and green). Introduction of another category, coloured blue, with some positive and negative is farcical. As applied to the Ivy House Lane site the

<p>criteria used totally understate the Chiltern Area of Outstanding Natural Beauty (AONB), topography, access, safety and prohibitive infrastructure cost issues, all to the advantage of the promoter.</p> <p>Major windfall gains from land simply being reclassified from agricultural to residential use have been made. However, based on evidence of the past 30 years no developer has so far noticeably contributed to meaningful infrastructure improvements or shown tangible support to Berkhamsted communities. Capacity constraints and topographical issues continue to be dismissed resulting in the character of the Market Towns being slowly undermined. It is ironic from a house building planning perspective that more concern is given to a ruined castle almost a 1,000 years old than to the existing community.</p>	
<p>Individual respondent</p> <p>The TRL report for Dacorum recognises there are issues with water supplies and waste water disposal in contradiction to preserving the natural environment but also does not suggest workable solutions. (p10) TRL report.</p>	<p>The assessment tables for the Options for growth identify potential mitigation for dealing with these two issues.</p>
<p>BERKHAMSTED FOCUSED RESPONSES</p>	
<p>Berkhamsted Town Council, Berkhamsted Residents Action Group and the Berkhamsted Citizens Association – with comments repeated by multiple individuals</p> <p>Development on the Green Belt could not possibly offer any net “environmental enhancements” - the net effect can only be negative regardless of size, and the larger the development, the greater the negative effect.</p>	<p>The SA has identified the adverse effects associated with developing the greenfield sites. However there is the potential for providing environmental enhancements, particularly in the larger developments (e.g. a new woodland or Country Park replacing an arable field) and so this has also been recognised in the SA.</p>
<p>Increased population would only help support the existing local economy if growth is focused within easy access of the existing centres.</p>	<p>The SA has identified the potential local economic benefits that could result from new development.</p>

<p>Any new facilities within larger edge-of-town expansions may be required for the new settlements but would not benefit the wider community and would - in effect - lead to these developments becoming “dormitory” developments, especially around the Market Towns. This is a fact that DBC stressed at previous inspections.</p>	<p>The SA has assumed that new facilities would be accessible to, and used by, both new and existing residents.</p>
<p>The cumulative effects of developments have not been assessed thus undermining any conclusions made.</p> <p>This exercise is flawed. Whereas any particular site might be deemed to have an ‘insignificant’ negative impact, the sites when combined could as a whole have a significant negative impact on, for example, water provision, sewage capacity, over-use of infrastructure, trying to minimise pollution, etc., etc. It is the cumulative impact on sustainability of development past and present, together with that proposed in both the immediate and neighbouring areas, which should be assessed. This is a particularly acute problem for Berkhamsted. I do not accept many of the assessments made in the appraisal but, notwithstanding that, Berkhamsted has the most “negative but not significant” sites, many of which are in close proximity to one another and to ongoing as well as currently planned developments.</p>	<p>The assessments of the Options considered the overall effects of growth at the different settlements.</p> <p>The SA Working Note for the Schedule of Site Appraisals provided assessments of the individual sites included in the schedule.</p> <p>Cumulative effects will be considered further in future SA stages.</p>
<p>We do not agree with the conclusions made for the ‘Rejected Options’ in particular the Urban Capacity option (see Q16) and exporting growth to another council, specifically St Albans who wish to expand Hemel Hempstead without that expansion counting towards Dacorum’s numbers (see Q2)</p>	<p>It is not the role of the SA to determine what is and what is not a reasonable alternative – this being the decision of the Council. The SA reviewed the reasons provided by the Council and agreed that the rejected growth distribution options are not ‘reasonable alternatives’ that should be considered further in the SA/SEA and plan making processes.</p>
<p>It does not appear that enough impact assessments have been done on development in proximity to the special sites nor on the habitat and ecological impact of more building in the Berkhamsted valley from pollution and disruption of animal habitat and</p>	<p>The SA identified the potential adverse effects of new development on the biodiversity and landscape objectives. More detailed assessments will be undertaken at the next stage of SA and in the Habitats Regulations Assessment (HRA).</p>

<p>increased population and the effect on Beechwoods of all this and on the visual impact on the AONB of Ashridge from any further development in the Berkhamsted valley. However it is quite obvious that the impact will be hugely negative.</p>	
<p>Where is the assessment and appraisal of the infrastructure development required to support the current population of Berkhamsted never mind the currently anticipated increase in population to 2030? How can you therefore assess ANY development plan when the CURRENT planned developments will already bring the town and surrounds to a standstill? We cannot get parked in Berkhamsted, I have to queue at the end of Shootersway for up to 15m at certain times of the day, my own road (which private and non-adopted) is used as a major cut-through, water pressure is a regular recurring problem, etc...so where is the infrastructure and traffic development requirements and assessment BEFORE you plan to build more houses.</p>	<p>The assessments of the Options considered the overall effects of growth at the different settlements.</p>
<p>The appraisal does not take account of the 600 homes already built in Berkhamsted since 2006, alongside which there has been little additional infrastructure. In my opinion, this is a significant flaw.</p>	<p>The SA has considered the effects against the current baseline, which includes houses built since 2006.</p>
<p>Individual respondent At the Options conclusion level we endorse Berkhamsted Town Council's (BTC) response. The result of applying the SA/SEA methodology in some instances is unnecessary as the validity of the Option is highly questionable. For example Option 3 is extreme with limited rationale and conclusions are not necessary. At least one other higher house building Option above the Current Plan (Urban capacity Option?) would have merited consideration. Option 1 and 2 subsets appear to be biased and inconsistent particularly with location distributions having misleading headings (see Options 1A, 1C and 2C). Option subsets appear to have</p>	<p>The SA provided an assessment of those options which the Council considered to be 'reasonable alternatives'.</p>

<p>been chosen based on developer's available Call for Sites rather than sound town planning reasons.</p>	
<p>Berkhamsted Schools Group</p> <p>We agree with a number of the general conclusions of the Sustainability Appraisal, but not all. Paragraph 5.1.3 states that only the larger developments could provide opportunities for environmental enhancements. The Sustainability Appraisal does not define what constitutes a 'larger development' and this should be clarified in the emerging Local Plan. In any case, the potential for environmental enhancements relates to the specific circumstances of a site rather than its size.</p> <p>In respect of the separate issue of housing numbers, we agree with the findings of the Sustainability Appraisal that the higher level of growth proposed by Option 3 performs the best in relation to the social dimension of sustainable development. We also agree with the finding that the highest level of growth would help to support the local economy.</p>	<p>In general terms, 'larger' developments have a greater potential for providing environmental enhancements given the greater site area that can be assigned to green infrastructure.</p>
<p>Crest Nicholson</p> <p>We consider that the level of analysis within this is commensurate with the early stage that the evidence base and local plan process are at and the recognition (LPIAO SA Working Note pg 22) that there are "current high levels of uncertainty."</p> <p>We are concerned that elements of the analysis are flawed in undertaking a too simplistic approach (for example a tick / cross box analysis) of complex issues and that the elements of the sub-options that they consider (e.g. the differing apportionment of housing growth to Dacorum) are inconsistent for the reasons set out in section 4.0 of our Land at Blegberry Gardens, Berkhamsted (Site Be-h6) - Representations to Dacorum's New Local Plan:</p>	<p>The SA reflects the high level nature of the Issues and Options consultation. See Q46 responses for detail relating to Be/h6).</p>

<p>Issues and Options (Nov 2017) document by Lichfields on behalf of Crest Nicholson Chiltern.</p>	
<p>BOVINGDON FOCUSED RESPONSES</p>	
<p>Individual respondent There is not enough weight given to the negative impact of further development in Bovingdon especially on existing infrastructure problems - traffic congestion in the high street and at peak times on Box Lane</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments.</p>
<p>Gleeson Developer The Sustainability Appraisal Working Note contains a very high level assessment of the broad differences between the 7 different Growth Options presented in the Issues and Options document. The report itself highlights its own limitations, noting for example in Section 5.1.3 that "... Undertaking the high level assessments on the multi-dimensional options means that there is a large amount of uncertainty relating to the prediction of the likely effects ..." and "...given the strategic nature of the assessment it was therefore difficult for the SA/SEA to differentiate the scoring provided between the sub-options ...". In many cases, individual conclusions from the report are subjective and arguable. For example, the report suggests that the higher levels of growth under Option 3 would have greater impact on landscape, but that is not necessarily the case, since it is not the scale of development per se that causes impact on landscape assets, but how development is accommodated. Similarly conclusions that higher scales of development cause greater traffic generation is not necessarily the case, since larger scale developments can offer opportunities for integrated transportation measures, such that in theory, the reverse effect could arise. The key issue therefore is not so much whether or not individual conclusions of the report are justified, because each individual conclusion is</p>	<p>Noted</p>

based on an assumed rather than demonstrable set of impacts, but whether or not at this level of assessment, the report should be providing conclusions at all. In essence, the analysis as presented in Table 2 of the report suggests that most options perform comparably against most SA objectives, with the only exception being an expectation that higher levels of development will generate greater impacts on soils and landscape, but at the same time offering greater potential to meet housing needs and economic objectives. Given the relatively little differentiation between the options, compared to the acknowledged high level of uncertainty over the ability of the assessment to make accurate findings, the main conclusion from the report should be that at this stage, there is insufficient differentiation between the options or certainty over the assessment for the report to make meaningful conclusions. This is not a criticism of the authors, or the Council, but is just a recognition that based on the analysis to date, there is insufficient evidence to draw any determinative findings, and as such, all of the options remain credible.

KINGS LANGLEY FOCUSED RESPONSES

Individual respondent

The report is obviously flawed, the addition of the proposed housing to Kings Langley would clearly completely ruin its village feel. When we looked at houses to buy in the area, we moved to Kings Langley to be far enough away from the unattractive housing estates of Hemel Hempstead and to be in a village where you can be in a tranquil countryside setting, just a short walk from our house, as is the area and walk around the Shendish estate. Not enough attention has been paid to the detrimental effect of the additional traffic. The village cannot afford an increase in traffic, there is already a long queue to get back in at night from Apsley and Hunton Bridge and the recent development at Nash

The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments

<p>Mills has shown how little attention would be paid to providing adequate parking for residents of new homes, as can be seen from the line of cars parked along Red Lion Lane that now block the road. Access to Rucklers Lane from another housing estate would make it extremely difficult to exit and enter the road at busy periods, the parking at the bottom of the road only allows two cars at a time to leave as it is. Not enough attention has been given to the effects of pollution and soil sealing on the environment, formaldehyde levels are already high at times in the area and further soil sealing will only increase the storm surges we already see from the building of the A41 down Rucklers Lane. The report seems to give the impression that traffic calming measures will stop people driving and force them to walk or cycle, it's only really safe to cycle down the canal in the borough and the cycle lanes that have been designed in the area are either inadequate, too short or disappear at the dangerous points.</p>	
<p>Individual respondent</p> <p>Many of the conclusions in the Sustainability Appraisal Working Notes suggest disagreement with issues raised in the policy approach currently embodied in the Issues and Options document. The report also contains mixed and confusing conclusions. In one example of the latter is a sentence spanning 8 lines of text and containing 113 words - and I'm still not sure what it is saying! I do agree with the conclusion that 'the option for the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc., that would result from an increased local population. The highest level of growth (Option 3) performs the worst against the environmental objectives for the opposite reasons'. The report also identifies 'that the high levels of growth under Option 3 could put strain on</p>	<p>Noted</p>

<p>existing services and infrastructure, to the detriment of all residents, both existing and new.' This latter point is of particular pertinence in the context of appropriation of green belt land within or peripheral to the larger villages in the borough. Of particular concern to me is Kings Langley and its' specific issues. Those objections are covered in greater detailed feedback provided to later questions.</p>	
<p>Individual respondent Comments are in context of Kings Langley as a Village 5.1.2 " The compatibility assessment found that generally the Local Plan objectives are either compatible or have no relationship with the SA/SEA objectives." My objection here is that the SA/SEA objectives do not appear to give sufficient weight to the aspect that Kings Langley is a separate village with its own identity. "The incompatibilities that were identified were between the Local Plan objective for 'homes' and the SA objectives for 'water' and 'soils', as new housing will inevitably result in increased demand for water resources and the loss of some soils" Again, no mention of what I argue is a vital aspect above; in particular Option 3 would destroy the separate identity of KL and coalesce Hemel with KL potentially all the way down to the M25. 5.1.3. " In general terms the option for the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc." I agree with this statement. "The highest level of growth (Option 3) performs the worst against the environmental objectives for the opposite reasons." -Agreed "The assessment did however identify some benefits of the higher level of growth against the environmental objectives as the larger developments that would be required to deliver the growth could provide</p>	<p>The SA/SEA objectives have been designed as broad objectives to assess the Local Plan. They are not settlement specific. The SA considers that larger strategic sites provide the best opportunities for infrastructure provision and planning gain opportunities, including biodiversity enhancements.</p>

<p>opportunities for environmental enhancements" - No, disagree. Any environmental enhancements would be small and would not offset the impact of removing Greenbelt that this option would entail, and would certainly not mitigate my main concern which is the coagulation of Hemel with Kings Langley into one continuous sprawl down to the M25 with any sense of Kings Langley as a separate village completely lost.</p>	
<p>Individual respondent</p> <p>I do not feel that the Sustainability Appraisal working note makes particularly clear conclusions regarding the sustainability and environmental impact of the development proposals (and is also excessively complicated and lengthy for non-planners to digest), however I do agree with several of the points made in the document. The report concludes that Option 1 performs best against environmental objectives as there would be less housebuilding on greenbelt, less water consumption and fewer additional cars on the road. I feel that Option 1A is the best of the options overall as it has the lowest level of green belt development and what there is, is focused around existing towns where new employment and housing could be located close to each other. I agree that Option 3 would lead to the most negative impacts on factors such as pollution, flooding, access to healthcare (spreading development through the Borough) due to the erosion of the Greenbelt. I also feel that this is the least sustainable option from an environmental and infrastructure point of view as it appears to focus a large amount of development on Green Belt in all areas, and particularly in the Kings Langley area. This would impact massively on the levels of traffic passing through the village (which is already gridlocked for much of the day) and the associated air pollution. Should large scale housing development occur in Kings Langley it would inevitably attract commuters due to proximity to motorways and mainline rail into</p>	<p>The SA analysis reflects the 'high-level' nature of the Issues and Options document. It identifies the effects which a likely to result from each of the seven options. It identifies issues relating to providing new development in the villages.</p> <p>A more detailed assessment will be provided in the SA Report.</p>

<p>London. Both of these transport options are already massively overcrowded so the road network would become even more overloaded. If jobs are to be created in Hemel Hempstead for the Borough, it makes sense to focus housing development on brownfield sites in both the town (so that more green travel options were available) and also in Tring and Berkhamsted as it wouldn't then add to the already congested traffic around the Two Waters/Apsley/Kings Langley area. There is no capacity for building additional roads in Kings Langley due to the valley location and canal. Building on green belt at Rectory Farm would also negatively affect the canal side environment and large scale building at Hill Farm, Wayside Farm and Shendish (which is included under Hemel Hempstead but is in fact part of Kings Langley) would inevitably affect the run off of rainwater and increase flooding problems already occurring at the bottom of the hill on roads leading onto Watford/Hempstead roads. School places and accessibility of Watford Hospital would also be negatively impacted. The document rejects significant expansion of a large village (p 28) for the reasons of directing development to less sustainable part of the Borough without key services and facilities and also substantial changes to the compact and rural character of villages. Option 3 entails large scale development of Kings Langley which would definitely classify as significant expansion of the village and should therefore be rejected on this basis.</p>	
<p>Individual respondent</p> <p>I live in Kings Langley and feel that you have not seriously looked at the Sustainable Appraisal factors with the infrastructure impact at all. The roads and schools are full at the moment with the recent Brownfield developments in the Apsley Lock and Kings Langley area. In addition all the proposals affecting Kings Langley are putting fictional proposals of schools, health, infrastructure</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>

<p>jobs etc. These have no substance and as far as I know unenforceable. I know of examples where when the Green belt is released then these offers disappear leaving existing facilities massively stretched and not fit for purpose.</p>	
<p>Individual respondent</p> <p>The council's sustainability plans are based on assumptions that a good proportion of new dwelling residents will commute to work either by walking or cycling. Clearly this is unrealistic for Kings Langley where there are very limited employment opportunities locally. Public transport at rush hours is beyond capacity (primarily trains to London). The entire character of the village will be fundamentally altered by these plans and we will effectively become an urban sprawl merging into Abbots and Hemel. In addition the local amenities and infrastructure are already stretched - roads, parking, schools, shops and doctors and these developments will only make a bad situation worse. Therefore the fundamental sustainability assumptions for the development plans are completely flawed. Finally it would appear to be Government Policy that there will be no building on Green Belt Land in London and the Home Counties. This would appear to be completely at odds with all of your options.</p>	<p>The provision of necessary Infrastructure to support new development will be addressed through the IDP supported by the plan wide and site specific viability assessments</p>
<p>Individual respondent</p> <p>No I do not agree with all the conclusions reached in the SA Working Notes however I do agree that the conclusion "In general terms the option for the lowest level of housing growth (Option 1) performs best against the environmental SA/SEA objectives as it would require less house-building on greenfield sites and less water consumption, fewer additional cars on the roads etc., that would result from an increased local population." is well founded. The site designation "HH-h3 Land at Shendish" is classified incorrectly as Hemel Hempstead, it is in fact Kings Langley.</p>	<p>Noted</p>

<p>Individual respondent</p> <p>I do not agree with the statement that only Option 3 would "put strain on existing services and infrastructure, to the detriment of all residents, both existing and new", and am in favour of Option 1, as the most sustainable option. The development plans put Kings Langley at risk of losing its village status, which would be irreversible, with unsustainable growth causing destroying the heritage of the village.</p>	<p>The assessments for Option 1c and 2c identified that new development in the villages could put pressure on existing services, but it would also provide opportunities for improvements to the existing infrastructure (e.g. schools, healthcare, open space).</p>
<p>Angle Property Limited</p> <p>The draft Plan is based upon multi-dimensional options. Seven growth options are set out in a table beneath paragraph 10.4.2, which reflect three different potential growth rates and three potential approaches to distribute such growth. The authors of the Sustainability Appraisal recognise that the high level assessments that they have undertaken on these multi-dimensional options, results in a large amount of uncertainty relating to the prediction of the likely effects of each option. This is reflected in the findings of the Sustainability Appraisals / Strategic Environmental Assessment. Accordingly, the weight given to the sustainability Appraisal should, at this stage, be very limited. For the reasons set out in other representations, APL support Option 2C which we consider provides a balanced approach to development, and is the most sustainable way to meet the housing needs of the district. The Sustainability Appraisal should be kept under review as the approach to the Plan, in terms of the seven options, becomes clearer.</p>	<p>The sustainability appraisal has been prepared to inform the preparation of the Local Plan and in itself does not carry 'weight'.</p> <p>The SA analysis reflects the 'high-level' nature of the Issues and Options document. A more detailed assessment will be provided in the SA Report. Cost analysis is not a requirement for SA/SEA.</p>
<p>MARKYATE FOCUSED RESPONSES</p>	
<p>D B Land and Planning</p> <p>In general, DBLP support the conclusions of the Sustainability Appraisal (SA) working notes as it provides sufficient consideration of the reasonable alternatives for accommodating</p>	<p>Noted</p>

<p>development across the Borough. Specifically, SA objectives 11, 12 and 13 shows that the Council has given appropriate consideration to the issue of housing need and the impacts associated with it In terms of the initial results of the SA process, there has to be a recognition that it is simply not possible to locate all of the Borough's development needs adjacent to Hemel Hempstead and that there is a need to accommodate development in a series of locations across the Borough to meet the needs of individual settlements. DBLP support the conclusion on B-17 that a concentration strategy is not realistic (Option 1C). This should lend significant weight to the Plan going forward that there is a need to release Green Belt sites for development</p>	
<p>TRING FOCUSED RESPONSES</p>	
<p>Individual respondent The Local Plan quite rightly states an intention to prioritise brownfield sites over greenfield, yet it goes on to make concrete proposals only for greenfield sites, with scant investigation of all potential brownfield sites. The SA document conclusions should make stronger criticism of the lack of detail on the Local plan</p>	<p>The Issues and Options document identified that c. 10,940 homes would be provided in the 'urban capacity' sites. These would include brownfield sites. It is not the role of the SA to criticise the level of detail provided at this early stage.</p>
<p>Individual respondent Green Belt is intended as a green corridor around both building developments and also around AONBs. There is a lack of adequate Green Belt provision between the Chiltern AONB and certain development plans including TR-H1, TR-H4, TR-H6. The SA document conclusions do not address these issues</p>	<p>Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies and will be further addressed in the Greenfield Site Assessment Study</p>
<p>Individual respondent The SA document conclusions make no reference to Sustainability Offsetting plans (ref Local Plan 8.1.10). Under offsetting plans, Developers are supposed to contribute to a fund to somehow compensate for the loss of biodiversity etc. At the</p>	<p>The SA provided a high level assessment of the Options within the Issues and Options document. A more detailed assessment will be undertaken at the next SA stage, where policy relating to Sustainability Offsetting will be assessed.</p>

<p>planning consultation meeting, we were advised by Dacorum planning officers that this scheme is not functioning as it should and Dacorum have no plans to address this.</p>	
<p>Individual respondent</p> <p>Tring is an attractive market town closely adjoining a national area of outstanding natural beauty. Tring relies on tourism brought in by the attractive surrounding area, the AONB, the National Trust sites, the Ridgeway path, the lovely high street, Tring Park, Wendover Wood and the Rothschild connection. Tring has one road, the former road to London, as a main high street. The bypass was built to take vast amounts of traffic. The high street is becoming congested again, even with the bypass and when the bypass is closed for any reason, the traffic stretches from Watford through Hemel, Berkhamsted to Tring in one continuous line. If all this development were to go ahead another bypass on the Infield way through to the M1 would be required to ease traffic. Traffic is not a feature of an attractive market town. Page 8 of the Dacorum Document produced by TRL seems to not mention that we are adjacent to a National Area of Outstanding Beauty and that any views from there have to be taken in to consideration. It also itself in terms of preserving and protecting our environment by admitting Dacorum are above regional levels of pollution. Our postcode area is already 12% over the national average for development according to Dr Alasdair Rae from the Urban Studies and Planning Department at the University of Sheffield.</p>	<p>Reference is made to the AONB on page 9 of the SA Working Note.</p> <p>The SA recognises that there are air quality issues in some parts of the Borough and has provided an assessment of the likely effects of the options on air quality.</p>
<p>Individual respondent</p> <p>The Sustainability Appraisal working note provides an assessment of the relative sustainability of the seven distributions of growth options being considered by the Council. It is accepted that there will inevitably be a need for new housing in Dacorum over the Plan period. However, we have a fundamental concern</p>	<p>The sustainability appraisal has been prepared to inform the development of the Local Plan – not to justify its approach.</p>

with the way that the Council has sought to distribute the proposed housing growth across the Borough. It is not considered that the Sustainability Appraisal provides justification for the Council's approach.

Our concern relates to the amount of development proposed to be allocated to Tring, which is disproportionate to the size of the settlement (see table below). Tring has a population of around 11,730, whereas Berkhamsted is significantly larger, as it has a population of around 18,500. Berkhamsted has a much larger range of shops and services than Tring, and is better able to accommodate a higher proportion of the housing growth. However, half of the growth options being considered by the Council (2A, 2B, 3) propose a higher level of housing at Tring than at Berkhamsted, despite the fact that Tring is a much smaller settlement and is less able to cope with the additional homes. Two of the growth options (1C and 2C) propose around the same level of homes in both settlements, which is again unacceptable as Tring is far smaller and should not be allocated the same level of growth.

The Sustainability Appraisal does not provide a robust assessment of whether the facilities available in Tring are sufficient to support the high level of housing growth proposed. This is a significant omission and means that the Sustainability Appraisal is of little use in deciding the distribution of growth in Dacorum.

The Sustainability Appraisal is also considered to be inadequate as it fails to provide any analysis of the benefits of allowing the smallest settlements in the Borough to grow, therefore, reducing pressure of housing on the larger settlements to accommodate growth. For example, five of the growth options proposed by the Council would not allocate any housing at all to the 'Rest of the

<p>Borough', which comprises of the thriving settlements of Marsworth, Wiggington, Aldbury, Cow Roast, Chipperfield, and Flamstead. Only two growth options propose to allocate housing to the 'Rest of the Borough ', but only 155 houses in respect of Option 2C and 608 houses in respect of Option 3.</p> <p>If the Council allocate sufficient housing to the many rural settlements in the 'Rest of the Borough', this would reduce the level of housing that needs to be allocated in places such as Tring.</p> <p>Finally, it is noted that the Sustainability Appraisal and the Council's consultation seek to deliver new housing through the allocation of a limited number of very large sites. The Council's consultation and the Sustainability Appraisal completely ignore the many smaller sites that have been put forward for development across the Borough, simply because of their small size. However, small sites can provide for future housing growth in a much more organic way, and are often the best way of delivering new housing growth. We question how decisions can be made in respect of the distribution of growth, if no analysis has been undertaken of the relative sustainability of the many small sites that have been put forward.</p>	
<p>Grove Fields Residents Association</p> <p>We consider that the approach to the working note is in principle suitable to form the basis of consideration for the Issues and Options paper. The approach to defining sustainable development, by way of the three arms of sustainability (Environment, Economy and Social Community) is consistent with Paragraph 7 of the National Planning Policy Framework 1 which is considered to be the most suitable and robust definition available to describe sustainable development. The consideration of strategic environmental assessment, together with habitats</p>	<p>Noted</p>

<p>regulation assessment is considered particularly pertinent given the expanse of protected green land that makes up the Borough and the approach that has been taken to these assessments, with regard to provision and identification of significant and likely effects is considered a responsible approach to underpin emerging policies, plans and allocations within the Local Plan to make sure they are robust to challenge.</p>	
<p>Castle Planning</p> <p>The Sustainability Appraisal (“SA”) Working Notes which form part of the consultation of this Issues and Options stage, are broadly supported. This work will need to be refined through the forthcoming stages of the Plan to reflect and assess the further detail at this stage. In the context of the high level at which the options and sites are currently being considered and assuming that the SEA/SA work and findings will need to be refined through the next stages of the Plan, to ensure that it best meets the requirements in this regard, the SA is supported at this stage.</p> <p>The analysis contained in the SA Working Notes document states that the issues identified in the SA and SEA are covered in the Local Plan through the specified policies. This will need to be further refined in the next stages of the Plan preparation.</p> <p>The proposed Local Plan Vision and Objectives are accepted as generally compatible with the SA/SEA objectives.</p> <p>The growth options put forward have been considered in the SA/SEA work, however there remains a significant amount of uncertainty as to the impact of these due to the current high level of the assessment which is possible at this stage. Inevitably, the lowest growth option performs best in sustainability terms, as it has the least impact in terms of development of greenfield sites, water consumption, vehicular movements etc. There are however other reasons why this level of growth is not appropriate, which is</p>	<p>The assessment against SA objective 13 (Housing) identifies that the higher levels of growth would have greater positive effects against that objective.</p> <p>Smaller sites will be considered and assessed as part of the detailed development of the plan. Smaller sites will be considered as part of the Greenfield Site Assessment and Urban Capacity Studies. Allowance for small sites that come forward as windfall proposals will also be addressed in the detailed policy framework and housing trajectory work.</p>

set out in our response to Question 16, in relation to the identified level of housing need, which this lowest growth level does not achieve. It therefore cannot be sustainable in this context and an option which has greater impact in terms of the SA/SEA appraisal will therefore need to be considered and the impact of this offset against the wider benefits of meeting housing needs.

By providing a higher number of homes, there can be improved sustainability through the range of homes which can be delivered to meet identified needs. Smaller sites can also deliver a range of unit types and this can be secured through individual planning permissions. The nature and scale of development sought through this Plan should therefore seek to balance the sustainability impact of development with the benefits which can be brought about by that development. This will require recognition that development may impact some aspects of sustainability to an extent, but that it can also improve social and economic factors, whilst environmental and infrastructure impact can be mitigated where improvements are made in this regard as part of new development. The extent and range of these mitigation measures and improvements should form an integral part of development at all scales and be negotiated in the context of planning applications which come forward as well as being sought at a strategic level.

Harrow Estates / Turley Associates

The SA does not consider the inherent sustainability of the growth options; in particular Option A which focuses development in the three largest and most sustainable settlements in the borough. As a consequence it fails to provide the Council with the appropriate evidence from which to select the optimum spatial strategy. Harrow Estates plc has commissioned Turley to prepare a Sustainability Appraisal for land east of Tring including potential

locations Tr-H1, Tr-H2 and further land to the north comprising a total of c. 100ha. That document also includes a review of the Sustainability Appraisal Note and provides a more detailed response to Question 1.

With regards to the SA assessment of the different growth options, the SA does not appear to have recognised the different sustainability performance of the different distribution options.

Fundamentally the assessment does not recognise the inherent sustainability benefits associated with those options that seek to locate the majority of housing within the most sustainable locations within the Borough.

As an example, Table 2 of the I&O SA Working note summarises the scoring for each of the seven growth options.

Options 1A, 2A and 3 distribute significant quantities of housing to Hemel Hempstead, Berkhamsted and Tring which are recognised by the Council as the three most sustainable settlements in Dacorum. SA Objective 11 (Sustainable Locations) reflects the importance of placing housing in the right location to provide residents with access to key services and facilities by sustainable modes of transportation.

Yet the SA assessment for SA Objective 11 results in the same score against all of the growth options except for Option 1c which does not locate any housing within Hemel Hempstead.

The SA assessment should acknowledge the significant sustainability benefits of those distribution options that locate housing within the three major towns within Dacorum and reflect that in the SA scoring.

Table 2 should therefore record significant positive effects against SA Objective 11 for Options 1A, 2A and Option 3. Such amendments would allow Dacorum Borough Council to make a

more balanced assessment of the most sustainable housing distribution option.

Furthermore it can be argued that those options that locate housing in the most sustainable locations are likely to have positive benefits with regards to a number of additional SA objectives such as:

- SA4: Climate Change and Air Quality: placing housing in the most sustainable locations will reduce the need for private car use and therefore greenhouse gas and vehicle emissions
- SA 10: Health and Wellbeing: there will be health and wellbeing benefits for new and existing residents through the support to and creation of new social and community facilities.

SA 14 and 15: Economy and Employment. Housing in the most sustainable settlements will be able to access the boroughs employment opportunities via sustainable modes of transportation.

Should Table 2 be amended in line with the scoring above then it is clear that the most sustainable distribution options are those which choose to locate the majority of the housing in the most sustainable locations of Tring, Hemel Hempstead and Berkhamsted.

Summary of a review of the I&O and Site Appraisal SA Working notes.

The I&O SA does not recognise the inherent sustainability benefits of those growth options (particularly Option A) that prioritises the location of new housing in the three most sustainable settlements within the Borough. Neither does it reflect the more detailed technical evidence that is available for this site. In the circumstances it does not provide Dacorum

<p>Borough Council with the correct evidence from which to select the most sustainable distribution option.</p> <p>Furthermore, Land East of Tring has been assessed within the Site Appraisals SA as a reasonable alternative to deliver new housing within Tring. The assessment has identified a range of negative, uncertain and positive effects however this assessment was undertaken on the smaller option of Land which is now contained within the large site, Land to the east of Tring which is the subject of these representations.</p> <p>To demonstrate the sustainability performance of Land to the east of Tring, section 6 of this SA appraises the site against the SA Objectives utilising the current technical evidence.</p>	
<p>Proponents of development at other settlements</p>	
<p>Individual respondent</p> <p>The Sustainability Appraisal working note provides an assessment of the relative sustainability of the 7 distribution of growth options being considered by the council. These options seek to distribute the majority of the growth to the largest settlements of Hemel Hempstead, Berkhamsted and Tring, but we do not consider that this should be at the expense of the smaller settlements which also have a need for new homes. Growth Options 1A, 1B, 1C, 2A, and 2C do not propose to distribute new homes to any of the settlements that exist in the 'Rest of the Borough'. This is unacceptable because these settlements, including Little Gaddesden, also have a need for new homes. Only Growth Options 2C and 3 propose to allocate some housing to the settlements in the 'Rest of the Borough', but the number of homes proposed is very low and would not address the needs of the settlements that exist in this area. The number of new homes distributed to the to the rest of the borough is insignificant, considering that this area contains several key</p>	<p>The role of the sustainability appraisal is to assess those options which the Council have identified as reasonable alternatives – not itself to determine what is considered to be a reasonable alternative.</p> <p>Smaller sites will be considered and assessed as part of the detailed development of the plan. Smaller sites will be considered as part of the Greenfield Site Assessment and Urban Capacity Studies. Allowance for small sites that come forward as windfall proposals will also be addressed in the detailed policy framework and housing trajectory work.</p>

settlements, including Marsworth, Wilstone, Wiggington, Aldbury, Cow Roast, Little Gaddesden, Potten End, Chipperfield, and Flamstead. These settlements are diverse and have different characteristics and needs. Paragraph 5.4.2 of the Sustainability Appraisal notes the Council's Reasons for rejecting alternative growth distributions, but does not provide a robust analysis of the alternative growth options. It simply states that they agree with the council, without any analysis or discussion, and we do not consider this to be reasonable. The Sustainability Appraisal should provide a robust analysis of all options for the distribution of growth, to properly inform the preparation of the emerging Local Plan. It should include an assessment of the sustainability of allowing a higher level of growth in the many settlements that exist in the Borough, including settlements Little Gaddesden. Depriving these settlements of reasonable housing growth cannot be sustainable. The Sustainability Appraisal working note is inadequate, as it fails to provide any analysis of the sustainability benefits of allowing small settlements such as Little Gaddesden to grow to meet the need that exists for homes in these locations. This is a really important issue for rural communities so should be examined in the Sustainability Appraisal. We are also concerned that the Sustainability Appraisal working note does not provide specific analysis of the merits of the proposed housing sites that have been put forward in the Rest of the Borough (except for one site at Potten End and one in Wilstone). How can decisions be made in respect of the distribution of growth, if no analysis has been undertaken of the relative sustainability of the sites that have been put forward? The table at paragraph 10.4.2 of the Issues and Options Consultation Document states that the 'Rest of the Borough' has identified housing capacity of 600 dwellings. We question how this figure has been calculated, as we understand that this is far below the capacity of the sites that have

been put forward. Finally, it is noted that the Sustainability Appraisal and the council's consultation seek to deliver new housing through the allocation of a limited number of very large sites. The Councils consultation and the Sustainability Appraisal completely ignore the many smaller sites that have been put forward for development across the Borough, simply because of their size. However, small sites can provide for future housing growth in a much more organic way, and are often the best way of delivering new housing growth. We question how decisions can be made in respect of the distribution of growth, if no analysis has been undertaken of the relative sustainability of the many small sites that have been put forward. Level of housing In respect of the separate issue of housing numbers, we agree with the findings of the Sustainability Appraisal that the higher level of growth proposed by Option 3 performs the best in relation to the social dimension of sustainable development. We also agree that the finding that the highest level of growth would help to support the local economy. We deal with the issue of growth later in this Statement.

Plato Property Investment

Distribution of Growth The Sustainability Appraisal working note provides an assessment of the relative sustainability of the 7 distribution of growth options being considered by the council. These options seek to distribute the majority of the growth to the largest settlements of Hemel Hempstead, Berkhamsted and Tring, but we do not consider that this should be at the expense of the smaller settlements which also have a need for new homes. Growth Options 1A, 1B, 1C, 2A, and 2C do not propose to distribute new homes to any of the settlements that exist in the 'Rest of the Borough'. This is unacceptable because these settlements, including Cow Roast, also have a need for new homes. Only Growth Options 2C and 3 propose to allocate

The role of the sustainability appraisal is to assess those options which the Council have identified as reasonable alternatives – not itself to determine what is considered to be a reasonable alternative.

The assessments for Options 2c and 3 identify that unlike the other options they would help to meet local housing needs across all areas of the Borough.

The SA Working Note for the Schedule of Site Appraisals provided an analysis of the sites included in the Schedule of Site Appraisals. This schedule included those sites with a capacity of 50 home or more and therefore smaller sites were not assessed at this early stage.

housing to the settlements in the 'Rest of the Borough', but the number of homes proposed is very low and would not address the needs of the settlements that exist in this area. The number of new homes distributed to the to the rest of the borough is insignificant, considering that this area contains several key settlements, including Marsworth, Wilstone, Wiggington, Aldbury, Cow Roast, Potten End, Chipperfield, and Flamstead. These settlements are diverse and have different characteristics and needs.

Paragraph 5.4.2 of the Sustainability Appraisal working note simply refers to the Council's Reasons for rejecting alternative growth distributions. We are concerned that the Sustainability Appraisal does not provide a robust analysis of the alternative growth options, and simply states that they agree with the council that the alternatives should not be considered further. We do not consider that this is reasonable. The Sustainability Appraisal should provide a robust analysis of all options for the distribution of growth, to properly inform the preparation of the emerging Local Plan. It should include an assessment of the sustainability of allowing a higher level of growth in the many settlements that exist in the Borough, including settlements like Cow Roast. Depriving these settlements of reasonable housing growth cannot be sustainable.

The Sustainability Appraisal working note is inadequate, as it fails to provide any analysis of the sustainability benefits of allowing small settlements to grow to meet the need that exists for homes in these locations. This is a really important issue for rural communities so should be examined in the Sustainability Appraisal. Cow Roast, whilst being one of the smallest settlements in the Rest of the Borough, is notably the only one located along the main A4251 London Road with easy access to the larger nearby settlements of both Tring & Berkhamsted and

Smaller sites will be considered and assessed as part of the detailed development of the plan. Smaller sites will be considered as part of the Greenfield Site Assessment and Urban Capacity Studies. Allowance for small sites that come forward as windfall proposals will also be addressed in the detailed policy framework and housing trajectory work.

those related public transport services nearby. It is inappropriate therefore, for it to be regarded in the same way as more remote villages served only by country lanes. We are also concerned that the Sustainability Appraisal working note does not provide specific analysis of the merits of the proposed housing sites that have been put forward in the Rest of the Borough (except for one site at Potten End and one in Wilstone). How can decisions be made in respect of the distribution of growth, if no analysis has been undertaken of the relative sustainability of the sites that have been put forward? Finally, table at paragraph 10.4.2 of the Issues and Options Consultation Document states that the 'Rest of the Borough' has identified housing capacity of 600 dwellings. We question how this figure has been calculated, as we understand that this is far below the capacity of the sites that have been put forward. Level of housing In respect of the separate issue of housing numbers, we agree with the findings of the Sustainability Appraisal that the higher level of growth proposed by Option 3 performs the best in relation to the social dimension of sustainable development. We also agree that the finding that the highest level of growth would help to support the local economy. We deal with the issue of growth later in this Statement.

Question Number 2	
Question Text: Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?	
NO	
<i>If no, please explain what we have missed and how they should be addressed in the plan.</i>	
Key points raised in representations	Officer response
1. Canal and Rivers Trust – Waterways can help with delivering a range of policy topics or themes and it is important to consider waterways as a cross cutting theme or topic in plans. Waterways can also provide links to neighbouring areas.	Points will be taken into account in detailed policy drafting and in developing site allocations.
2. Chilterns Conservation Board -Add reference to cross-boundary cooperation on the Chilterns AONB through the Chilterns Conservation Board	Cross boundary working will be addressed through the Duty to Cooperate (DtC) process and outcomes will be reported as part of the Local Plan Evidence Base

Question Number 2

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NO

If no, please explain what we have missed and how they should be addressed in the plan.

Key points raised in representations**Officer response**

3. Markyate Parish Council - Markyate is on the County boundary with Mid Bedfordshire and Luton Borough. The expansion of Luton airport, with the noise issues as well as the impact of the extra traffic on local roads are of great concern locally. The relocation of Luton town Football Club is also significant. Mid Bedfordshire are consulting on reducing traffic through central Dunstable and there are plans we believe for a huge housing development near Caddington. These plans will also affect Markyate. The Parish Council is not resourced adequately to keep up with all these plans. Dacorum has a long boundary with other counties, but at present would seem to be concentrating on joint working with St Albans City Council. Markyate is closer to Luton and Dunstable than it is to Hemel Hempstead and needs Dacorum Local Plan to address the many developments in Mid Bedfordshire and Luton Borough.

Cumulative impacts of development will be considered and addressed as part of the Local plan Evidence base and discussed through the DtC process to identify issues and solutions. Infrastructure issues will be covered by the emerging Infrastructure Plan (IDP) and DtC.

Question Number 2

Question Text: Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?

NO

If no, please explain what we have missed and how they should be addressed in the plan.

Key points raised in representations

Officer response

4. Tring Town Council Section 3.6 gives a commitment to the necessary engagement, but this should have been completed prior to the Issues & Options consultation to identify the issues in assessing the capacity of Tring’s infrastructure to absorb regional growth including proposals for Aylesbury Vale District Council due to the sheer scale of the development due to take place. Significant growth is already underway at Leighton Buzzard and north of Dunstable, and more homes in the Draft Central Bedfordshire Plan for land west of Luton; the scale of this development will put an exceptional strain on the infrastructure of the entire region. The transport implications are of particular concern. Hertfordshire County Council has issued its draft Local Transport Plan. As presented, this marks a sea-change in policy away from car dependence, unhealthy lifestyles and unsustainable travel behaviour. The defined South West Hertfordshire Functional Economic Market Area (FEMA) provides an immediate geographic grouping that has its purposes, but this is too restricted in light of the scale of growth across the region.

The Issues and Options consultation is the beginning of the Local plan Process and there will be further engagement as the plan evolves. There will also be a further opportunity for engagement at the Examination Stage.

Cumulative impacts of development will be considered and addressed as part of the Local plan Evidence base and discussed through the DtC process to identify issues and solutions. Infrastructure issues will be covered by the emerging Infrastructure Plan (IDP) and DtC.

Question Number 2	
Question Text: Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?	
NO	
<i>If no, please explain what we have missed and how they should be addressed in the plan.</i>	
Key points raised in representations	Officer response
5. Historic England - We would recommend that the conservation and enhancement of the historic environment is identified as a key cross boundary planning issue and a strategic duty-to-cooperate priority in line with paragraph 156 of the NPPF. We would also like to see Historic England is listed as a Duty to Co-operate partner	We will engage further with Historic England as part of the DtC process. Specific policies building on the guidance in the NPPF will be considered as part of the drafting of the Local Plan.
6. Northchurch Parish Council - DBC have reflected the issues but co-operation with St Albans was a key issue in the Core Strategy Inspection. DBC have tried to engage with St. Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. The significant developments in neighbouring parts of Bedfordshire and Buckinghamshire particularly in Aylesbury will impact on the environment and infrastructure in West Dacorum.	Cumulative impacts of development will be considered and addressed as part of the Local plan Evidence base and discussed through the DtC process to identify issues and solutions. Infrastructure issues will be covered by the emerging Infrastructure Plan (IDP) and DtC. DtC will includes engagement with SADC.
7. Inadequate highway and rail infrastructure to support further development, further development will require significant highway and rail improvements; new infrastructure should be provided ahead on new housing	Infrastructure issues will be covered by the emerging Infrastructure Plan (IDP) and DtC which will form part of the Evidence Base and inform policy development and site allocation.
8. Development in St Albans adjacent to the borough boundary is inappropriate and SADC have not cooperated with DBC to deliver joined up development	DtC will includes continued engagement with SADC.

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NO	
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Key points raised in representations	Officer response
9. Redevelopment in Three Rivers has not been carried out in a joined up manner with Dacorum and issues have not been properly addressed	DtC will includes continued engagement with TRDC.
10.Full consideration has not been given to the coalescence of settlements and the scale of development in neighbouring Council areas including brownfield redevelopments.	Impacts of development on the Green Belt and its purposes, including coalescence will be considered in detail as the plan develops including through the Site Assessment work
11.Lack of consultation with specialist services and infrastructure providers	DtC requires, and will include, liaison with infrastructure providers. The IDP work will also from part of the Evidence Base supporting the Local Plan
12. Impacts on wildlife and biodiversity have not been properly considered	Wildlife and biodiversity will be assessed in line with the NPPF and addressed through SA/SEA and HRA work

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YES	
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Key points raised in representations	Officer response
1. Chiltern and South Bucks District Council provide a detailed response on multiple points but welcome the opportunity to continue the DTC process with a view to agreeing and MoU with DBC.	DTC discussions will continue as part of the development of the Local Plan
2. Hertsmere Borough Council welcome the commitment to working in co-operation with neighbouring authorities in line with the Duty to Cooperate. The commissioning of joint technical studies to support the preparation of our Local Plans and on-going discussion between our authorities (including under the umbrella of the South West Herts grouping of authorities) is evidence of this commitment. Paragraph 4.2.2 lists a number of issues that you anticipate needing to be addressed on a cross-boundary basis; we would suggest that the provision of retail facilities and of transit provision for gypsies and travellers could also usefully be on this list.	DTC discussions will continue as part of the development of the Local Plan. We will continue to collaborate with HBC on joint pieces of work across SW Herts.

Question Number 2

Question Text: Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?

YES

If no, please explain what we have missed and how they should be addressed in the plan.

Key points raised in representations

Officer response

3. Berkhamsted Town Council - DBC have reflected the issues but co-operation with St Albans was a key issue in the Core Strategy Inspection. DBC have tried to engage with St Albans but that council's refusal to co-operate cannot be allowed to impact detrimentally on Dacorum. Contribution towards Dacorum's housing target from the Gorhambury development should be included in this plan. We also question the lack of consideration given to the significant housing developments in neighbouring parts of Bedfordshire and Buckinghamshire – particularly the substantial housing expansion of Aylesbury which will impact on the environment and infrastructure in West Dacorum.

We will continue to work with SADC and other neighbouring/nearby Local Planning Authorities

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Key points raised in representations	Officer response
4. Aylesbury Vale District Council -Duty to Co-operate Finally, we consider it will be important to maintain officer and Member level Duty to Co-operate dialogue to better understand the issues above and to inform the required monitoring of co-operation between the two Councils. We look forward to agreeing a formal Memorandum of Understanding between Councils to form part of the respective Local Plan evidence at the Submission stage. AVDC officers are currently at an advanced stage preparing a draft to be sent in the coming days to DBC officers for consideration.	DtC discussions with AVDC are continuing with a view to producing a SoCG.
5. Central Bedfordshire Council - CBC and Dacorum Borough Council have an established working relationship at both Officer and Member level and we look forward to continued cooperation between our two authorities as we both move towards the adoption of our respective local plans	DtC discussions with AVDC are continuing with a view to producing a SoCG.

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YES

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Key points raised in representations

Officer response

6. Watford borough Council - The Council supports progress on the new Local Plan and working collaboratively to meet the needs of the district and those which may affect the wider area of south west Hertfordshire. The cross boundary issues highlighted cover the strategic issues neighbouring authorities will need to confront as the Dacorum Local Plan and those of the respective local authority areas in south west Hertfordshire, are prepared. It will be important to recognise that each district will have different opportunities and limitations to address strategic issues in the long term as part of future collaborative discussions. Watford Borough Council looks forward to future collaboration as the respective local plans of both Councils move forward.

DtC discussions with WBC are continuing with a view to producing a SoCG.

7. St Albans City and District Council - Duty to Cooperate (DtC) context Given the South West Herts Group's approach to DtC at SADC's Strategic Local Plan (SLP) Examination in 2016, it is surprising that DBC's issues and options are being presented without further explanation of the strategic sub-regional planning context. There is only a very limited explanation of proposed DtC geography and arrangements and nothing about DBC's requirements relating to its Core Strategy adoption for consideration of wider than district planning

Requests for other LPAs to meet DBC housing need (Para 3.3.2) The consultation identifies a key issue as 'the role that effective cooperation with other councils could have in helping meet Dacorum's housing need'. It is acknowledged that this section is referring directly to DBC's adopted Core Strategy. However, it would be more balanced to somewhere to also acknowledge the reciprocal potential role for DBC in helping meet the needs of other LPAs – especially within the 5 LPA HMA.

Exporting growth to another council area / accommodating growth exported from other councils to DBC (Appendices B and C) These matters are touched on as rejected options / SA alternatives. This approach is supported. However there is an inconsistency with the references to 'Gorhambury' in SADC's area. Cross boundary development in SADC's area appears to still be being considered by DBC as an option for accommodation of DBC generated need. Additionally, it is considered potentially misleading to say that 'none of the other councils.(in the HMA) have indicated that they require Dacorum to accommodate any significant level of unmet need for their areas.' That is because the other Councils

DtC discussions with SADC are continuing with a view to producing a SoCG. The issues raised will be explored further through these meetings.

DBC has set out a comprehensive programme of DtC meetings with partners in line with the Regulations and guidance.

Any requests to neighbouring authority's to meeting housing need will be supported through the Local plan evidence base

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Key points raised in representations	Officer response
<p>in the 5 LPA HMA are all very early in their Plan-making processes. Further to various discussions, and as a context for these comments, SADC wishes to note that; following discussion regarding a report entitled “Housing Market Areas and Functional Economic Market Areas – Way Forward” at SADC’s Planning Policy Committee on 7 November 2017, an amended recommendation was unanimously voted through: “That the Council moves forward with joint work on a Statement of Common Ground with the South West Herts Group with a view to joining the Group. This work must take into appropriate account other important functional linkages such as with Welwyn and Hatfield.” We trust that the comments above will be of assistance as you continue with initial work on your Plan and future DtC arrangements.</p>	
<p>8. Greater London Authority - We would also encourage cooperation with St Albans Council to resolve cross-boundary matters on growth figures.</p>	<p>DtC discussions with SADC are continuing</p>
<p>9. HCC Minerals - The reference to the Minerals Local Plan for Hertfordshire in paragraph 3.6.2 and in 4.3.2 is welcomed</p>	<p>There will be further engagement under DtC</p>

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Key points raised in representations	Officer response
10.HCC Waste - The reference to the Waste Local Plan for Hertfordshire in paragraph 3.6.2 and in 4.3.2 is welcomed, as is the inclusion of reducing waste as an objective of the emerging Single Local Plan	There will be further engagement under DtC

11. HCC Planning - Reference to discussions with HCC as a key partner is welcomed and the undertaking of an initial Duty to Co-operate scoping consultation on potential cross-boundary matters is supported. Green Infrastructure - Planning practice guidance for GI was significantly updated in 2016, therefore neighbouring authorities, working collaboratively with other stakeholders including may wish to consider how wider strategies for their areas can help address cross-boundary issues and help meet the Duty to Cooperate.' Herts Planning Group have setup a GI task group that is currently reviewing the delivery of the Herts GI. In respect of the Issues and Options Consultation document: 3.6.1 The environment should also be included as a cross boundary issue given the presence of development in Buckinghamshire and the increasing impact the SAC and other environmental resources as a result, this should also specifically state the AONB Furthermore, there is a serious concern regarding the Suitability consideration included within the Dacorum Borough Council 2017 Call for Sites – Submission Form; however, there are no options listed for Other Constraints . It is considered that Landscape should have been a clear potential constraint as is Biodiversity / Ecology. This is particularly concerning given the European Site within the Borough, Nationally important sites, locally important sites, other features and ecosystem service issues of profound importance to the AONB. That biodiversity - one of the most profound drivers - and indeed test - of Sustainable Development - has not been properly considered at this early formal stage is of a serious concern to the soundness of the approach to identify sites The environment is one of the three core principles which underpins and defines

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Key points raised in representations

Officer response

Sustainable Development. This must include direct and indirect impacts of development within the site, locally and at distance where appropriate or necessary. The approach thus far is unacceptable and does not enable an adequate assessment of any site to be made.

12. Cumulative impacts of developments beyond the plan area need to be taken into account

Question Number 3

Question Text: Have we taken account of all relevant studies and reports as part of our Issues and options work?

NO

If no, please explain what the gaps in our evidence are and how they should be addressed.

Key points raised in representations

Officer response

<p>1. Concerns from the Chilterns Conservation Boards and other respondents that the report on the Cumulative impact of development on the Chilterns Area of Outstanding Natural Beauty (November, 2017) has not been given enough weighting. This mentioned that little reference of the management plan.</p>	<p>The Council acknowledge these comments; the Area of Outstanding Natural Beauty is given great weight within the National Planning Policy Framework, and is reflected within our Environmental Designations work in the Issues and Options document.</p> <p>The report produced by the Chilterns Conservation Board has been reviewed and considered. The Council acknowledge the potential to include a policy specifically on the protection of the Chilterns Area of Outstanding Natural Beauty and will be implemented if necessary. Currently any development that may concern the Chilterns AONB is considered through the management plan 2014-2019 which is adopted into our evidence base, and when the updated version is completed this will replace the existing document.</p> <p>Further consideration of the Chilterns AONB will be completed within our Sustainability Appraisal and Strategic Environmental Assessment to assess any issues that may arise and these would then be mitigated through Development Management policies on planning applications to ensure that this area is conserved.</p> <p>The Council is also considering the potential to introduce a policy into the new Local Plan that is specific to the Area of Outstanding Natural Beauty; however, this is still down to further discussion..</p>
<p>2. Berkhamsted Town Council, Berkhamsted Residents Action Group and Berkhamsted Citizens Association voice concerns that their review has not been given enough consideration regarding the Greenbelt review by SKM (November 2013), and that planning inspectors support</p>	<p>The Council acknowledge these comments and understand the issues raised within the BRAG report, however the SKM (November 2013) Greenbelt review provided an overview of potential land rather than specific allocations. The ARUP (January 2016) Greenbelt review was our more focused</p>

Question Number 3

Question Text: Have we taken account of all relevant studies and reports as part of our Issues and options work?

NO

If no, please explain what the gaps in our evidence are and how they should be addressed.

Key points raised in representations

this. Similarly, there is representation of greenbelt concerns on site KL-h3 Rectory Farm, and site D-S3 Shendish.

Officer response

greenbelt assessment for the Borough, although even this review will not form allocations.

The Greenbelt review serves as a starting point for allocations, which will be subject to further investigation and consultation with our stakeholders and the wider community. The Council takes the decision to release land from the Greenbelt as a last resort, and will be subject to meeting both National Planning Policy Framework and housing white paper guidance of Greenbelt removal.

The Council acknowledge that further work is needed regarding Green Belt release and understand that there may be potential for a further Green Belt review. Other work that will determine the need for Green Belt release will be conducted within our Urban Capacity work and site-specific assessments. Further consideration regarding the protection of biodiversity and landscape character will be considered through Development Management policies as part of the planning application process.

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Question Text: Have we taken account of all relevant studies and reports as part of our Issues and options work?	
NO	
<i>If no, please explain what the gaps in our evidence are and how they should be addressed.</i>	
Key points raised in representations	Officer response
3. Tring Town Council raise issues regarding the sustainability credentials of the consultation referring to a BEIS Clean growth strategy (October, 2017), and Committee for Climate Change 2012, and other general concerns regarding sustainability.	<p>The Council acknowledge these comments, however providing high efficient homes is not within the control of the Council and is determined by Building Regulations, which is in Government control.</p> <p>However the Council can push for climate change mitigation through other methods such as landscape massing, building orientation, and providing green infrastructure for biodiversity. This work will be carried out through the site assessments and consultation with the relevant bodies, and would subsequently be reviewed through the Development Management policies.</p>

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Key points raised in representations	Officer response
4. Concerns from Hertfordshire County Council that some matters have not been fully covered including the integration of the forthcoming Local Transport Plan, that the current documentation regarding historic environment only covers historic buildings, and that there should be reference to Hertfordshire environmental records.	<p>The Council acknowledge these comments. The Local Transport plan forms an important part of our evidence base, and will continue to inform our new Local Plan going forward.</p> <p>The documentation relating to the historic environment is lead by Hertfordshire County Council and so any amendments to documents will be reflected within the evidence base of the new Local Plan. Similarly, policies within our existing plans will be reviewed to ensure that they also reflect latest guidance from Government and Historic England.</p> <p>Reference to Hertfordshire Environmental records has been referred to within the documentation used within our evidence base.</p>
5. Northchurch Parish Council refers to the views of Berkhamsted Residents Action Group, Berkhamsted Town Council, the Chilterns Conservation Board and the Herts Valley Commissioning Group report.	The Council acknowledge this and have made representation to each of these views individually (See key points raised 1, 2 and 6)

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Key points raised in representations	Officer response
6. Concern from residents regarding healthcare provision. A 2016 study by Herts Valley Clinical Commissioning Group- West Hertfordshire Hospital Trust allocated a parcel of land to the south of Kings Langley for potential redevelopment.	<p>The Council acknowledge these comments and the report. The parcel of land examined within the Green Belt review (site KL-h3, Wayside Farm) would be subject to further site assessment work regarding its suitability for development. The decision to provide such facilities at this site is outside of the control of the Council, however should Herts Valley choose to go forward with this site the Council can allocate it for such use within the new Local Plan, subject to further consultation with the relevant bodies.</p> <p>The Council are to provide healthcare provisions within Dacorum through Proposal MU/2 which is included in the Sites Allocations DPD (June, 2017).</p>

Question Number 3

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NO

If no, please explain what the gaps in our evidence are and how they should be addressed.

Key points raised in representations

- 7. Grove Fields Residents Association voice concerns that the objectively assessed housing need in the Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment have not actively considered the brownfield strategy, or reassessing density levels.

Officer response

The Council acknowledge this and understand that further studies are needed in the Strategic Housing Market Assessment (January 2016) to address changes in Government standards, and are currently conducting another study to remedy this.

The Strategic Housing Land Availability Assessment (April, 2016) has only assessed brownfield sites that are capable of producing 5 or more homes, however this is not to say that more land will not come forward (These will be windfall sites that provide less than 5 homes, which are difficult to predict or anticipate).

It is in the Council's best interest to increase density were possible and conforms to Government guidance in the National Planning Policy Framework and Housing White Paper. The Council is currently working on its guidance for tall and taller building SPD to help provide greater density levels within the rural area. However, despite this support for brownfield and increasing density is not always possible if existing infrastructure cannot support it or if it would be harmful to existing settlements or heritage assets.

<p>8. Markyate Parish Council refer to some of the reports used and the issues they have with them. Do not believe this will improve rural bus services, the issue of water supply in the South East. They also question whether the housing numbers reflect commuters and if so these should be located near transport hubs. They would also like to see that wildlife and the environment are maintained and there is greater protection of chalk streams that stop pumping.</p>	<p>The Council acknowledge these comments and understand the issues raised. In relation to the improving rural bus services, this is not something that the Council can actively control. Should development come forward in the area that could support improved bus services then there would be consultation with service providers and Hertfordshire County Council, on how this could be provided.</p> <p>The Council appreciate the concerns raised regarding water availability, as part of our work the Council are conducting a water study to look at how this will be provided and will also be examined within our Infrastructure delivery plan. Similarly this will be reviewed through the Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulation Assessment.</p> <p>In terms of allocating housing sites it is in the Councils best interest to locate these where possible near transport hubs for the reasons raised in the representation and will be reviewed within our site assessment work. However, this is not always possible to do due to the land constraints and so the Council will consult with relevant stakeholders in how these issues would be addressed.</p> <p>The Council acknowledge this and agree that maintaining the environment and wildlife is important. The Council will consult with the relevant stakeholders to highlight and resolve any issues. The concerns raised about chalk streams will be considered with the upmost importance as identified in the Landscape Character Assessment. The Council are currently conducting numerous studies including updating our water study, and producing our Habitat Regulation Assessment,</p>
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Question Text: Have we taken account of all relevant studies and reports as part of our Issues and options work?	
NO	
<i>If no, please explain what the gaps in our evidence are and how they should be addressed.</i>	
Key points raised in representations	Officer response
	Sustainability Appraisal and Strategic Environmental Assessment all of which will inform our Local Plan going forward. The new Local Plan will update policies relating to biodiversity and be supported by Development Management policies as part of the planning application process.
9. Historic England would like to see the landscape character assessment and urban design guides updated.	The Council acknowledge this, these documents will be reviewed as part of our new Local Plan process and so will be examined to ensure that these documents are up-to-date and reflect current policy.
10. Consideration of the South West Hertfordshire Economic Study 2016. Respondents claim that employment land in Berkhamsted has been excluded from the study and that there should be compensatory employment land provided.	The Council acknowledge these comments and understand that retaining the necessary employment land within the borough is important in ensuring a resilient economy. The council monitor the amount of employment land available on an annual basis to ensure that this amount stays in alignment with our locally assessed needs.
11. Consideration for Canals and River Trust and their outcomes report- Waterways and Wellbeing.	The Council understand the importance of maintaining these, as both ecology and health assets for Dacorum. Rivers and Canals within the borough will be retained for such uses. Should any development come forward that may potentially encroach on these areas consultation with stakeholders and the wider community will be promoted, to ensure that these areas are protected and/or enhanced.

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NO	
<i>If no, please explain what the gaps in our evidence are and how they should be addressed.</i>	
Key points raised in representations	Officer response
12. Concern about air quality within proposed developments and its relation to the Air Quality Action Plan 2015- 2018.	<p>The Council acknowledge these comments, the Council is currently in the process of updating its Air Quality studies that will form part of the evidence base of the new Local Plan.</p> <p>Similarly, any concerns regarding air quality will be considered within the Habitat Regulation Assessment, Sustainability Appraisal and the Strategic Environmental Assessment, to accurately determine the potential impact of air quality. This will also be considered within our further site assessment work.</p>

Question Number 3

Question Text: Have we taken account of all relevant studies and reports as part of our Issues and options work?

YES

If no, please explain what the gaps in our evidence are and how they should be addressed.

Key points raised in representations

Officer response

Actions to be taken

<p>1. BRAG and other respondents raise concerns that the Green Belt review is flawed by looking at large land parcels and promoting whole areas for development where it may not be appropriate. They also raise concerns that their report of the Green Belt Stage 2 review has been ignored.</p>	<p>The Council acknowledge these comments and understand the concerns raised regarding Green Belt allocations, however the SKM (November 2013) Greenbelt review provided an overview of potential land rather than specific allocations. The ARUP (January 2016) Greenbelt review was our more focused greenbelt assessment for the Borough, although even this review will not form allocations.</p> <p>The issues raised within the BRAG report have been examined and noted. There is a need for sites to be reviewed on a more specific basis that can accurately consider the different issues of the land, which has not been reviewed within the more generalised reviews.</p> <p>These will be subject to further investigation and consultation with our stakeholders and the wider community. The Council takes the decision to release land from the Greenbelt as a last resort, and will be subject to meeting both National Planning Policy Framework and housing white paper guidance of Greenbelt removal.</p> <p>Once sites have been chosen for allocation it would still be necessary to retain green buffers in some instance especially if these allocations were to be located near woodland or busy/ noisy areas.</p>
<p>2. Concern raised that not enough land has been allocated from the Stage 2 Green Belt Review.</p>	<p>The Council acknowledge this. The Stage 2 Green Belt review served as a starting point, and so would be subject to further investigation regarding the amount of land necessary to provide housing. This is difficult to predict until more definitive housing numbers have been produced by Government. As part of our ongoing work the Council is currently undertaking an urban capacity study to determine how much development can be</p>

Question Number 3

Question Text: Have we taken account of all relevant studies and reports as part of our Issues and options work?

YES

If no, please explain what the gaps in our evidence are and how they should be addressed.

Key points raised in representations	Officer response	Actions to be taken
	provide within the existing settlement area. Once this has been completed only then will the Council further consider the need to release Green Belt land.	
3. South West Hertfordshire Economic Study (February, 2016) believe that a site has been excluded (Billet Lane). Should be plans for further employment growth in sustainable locations.	The Council acknowledge this. The amount of employment land available within the Borough is reviewed on an annual basis in our Employment land study. Similarly, we also have a consultant who helps us to identify whether there is any need for further employment land. Should there be an identified need for further land the Council will actively work with stakeholders and developers to provide this in sustainable locations which mitigate the possibility of transport related issues.	
4. Concern that the Green Belt review stage 2 and the Landscape Appraisal misinterpret the Green Belt purposes in the National Planning Policy Framework. Based on this site D-S3 should be removed	The Council acknowledge this. The Green Belt review served as a starting point to understand which generalised areas may be appropriate for Green Belt release. The Council are currently conducting a further review of sites through a consultant, which will help to inform which of these is most appropriate. Similarly, the Council is in the process of conducting an urban capacity study to determine the amount of development that can be provided within the settlement area. Once these steps have been taken the Council will be able to allocate sites provisionally which would then be put forward as our pre-submission document which can be publically reviewed.	

Question Number 4	
Question Text: Do you agree with the suggested vision for the Borough?	
YES	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
1. Sport England - supportive of the vision where it mentions healthy communities and open space. However, we would encourage the Local plan to also include sport and physical activity within the vision to promote a healthier community	Noted; health and wellbeing will be addressed as part of drafting of the Local Plan
2. Canal and River Trust - We are pleased to note that the Grand Union Canal is recognised as a special feature playing and active part in the heritage of the borough and that the wider historic environment is valued and protected. The Trust promote the canal as being a form of strategic and local infrastructure performing multiple functions. We believe the canal can transform places and enriches people's lives. The Trust will continue to work with the council.	Points will be taken into account in detailed policy drafting and in developing site allocations.
3. The vision should reflect the importance of protecting the Green Belt and protect it from development	Development options and scenarios will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

Question Number 4

Question Text: Do you agree with the suggested vision for the Borough?

YES

If no, please explain what changes you would like to see and why.

Key points raised in representations

Officer response

4. The vision should not be seeking to deliver significantly larger settlements

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

5. A holistic vision is required to deliver all types and tenures of housing including delivering genuinely affordable housing

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

Question Number 4	
Question Text: Do you agree with the suggested vision for the Borough?	
NO	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
1. Little Gaddesden Parish Council -It is good to have a vision but the content needs to be realistic and achievable. The growth options will put a strain on services and infrastructure meaning an increase in travelling times. It would interesting challenge to have an element of the Vision that says even with the growth options we will not make travel times any worse than they are now.	Comments and suggestions are noted. The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.
2. Chilterns Conservation Board - The vision refers to "The natural beauty of the Chiltern Hills", it would be better to refer to the "the outstanding natural beauty of the Chilterns Hills" or the "the natural beauty of the Chilterns AONB".	Noted; the vision update will take account of these comments and any appropriate amendments will be made.

Question Number 4

Question Text: Do you agree with the suggested vision for the Borough?

NO

If no, please explain what changes you would like to see and why.

Key points raised in representations

3. Berkhamsted Town Council - No, we have some concerns with the vision but believe that even as it stands it is undeliverable by any of the options being considered. For example, water supply, waste water management, power supply, health facilities, highway constraints, and secondary education are all major issues which can only be exacerbated by proposed development options. Health service provision within Dacorum should be improved, for this purpose we propose that part of site KL-h3 be reserved for possible future health purposes. Elderly care has been omitted from the vision. The 4th paragraph of the Vision should read: The market towns of Berkhamsted and Tring and the large villages should provide the necessary infrastructure and social, health and community services for their residents and surroundings.

Officer response

Comments and concerns noted.

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

The provision of infrastructure to support new development will be addressed through the IDP and DtC discussions.

Question Number 4

Question Text: Do you agree with the suggested vision for the Borough?

NO

If no, please explain what changes you would like to see and why.

Key points raised in representations

Officer response

4. Markyate Parish Council - The Borough needs to take a step back and see where the current Local Plan policies have failed or can be improved. We would like to see the needs of rural populations better understood and addressed. The quality of life in a rural community is very different from that in a town, but too much centralisation of services denies rural communities services that are taken for granted in towns.

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

The development of the Local plan will be informed by a reviews of existing/historic policies and developments to identify any lessons that can be learned.

The provision of infrastructure to support new development will be addressed through the IDP and DtC discussions.

5. Tring Town Council - The aspirations listed in the vision are all appropriate but as presented the vision lacks: Focus on the people of Dacorum A succinct expression of the plan's over-arching ambition Clarity – it is an unstructured collection of aims and implementation.

The comments are noted and will be taken into account in developing and refining the Local plan vision.

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

Question Number 4

Question Text: Do you agree with the suggested vision for the Borough?

NO

If no, please explain what changes you would like to see and why.

Key points raised in representations

Officer response

6. Historic England - The Plan's strategic policies will derive from the Vision and so there needs to be sufficient aspirations in the Vision for the maintenance and enhancement of the historic environment as a strand in the pursuit of sustainable development as defined by paragraph 14 of the NPPF. The Vision should be locally specific to Dacorum. It should reference the types of heritage assets which make up the stock of designated and non-designated assets within the Borough. The Vision should recognise the irreplaceable nature of the historic environment and heritage assets. It should convey the importance of the historic environment and how it helps create a sense of local distinctiveness and contributes towards the creation of high quality places that people want to live and work in. The need to conserve or enhance the historic environment should be referred to explicitly. Dacorum only has one property on the National Heritage at Risk Register. Even so it would be helpful to reference this along with any heritage assets which appear on any local at risk registers.

The comments are.

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

Question Number 4

Question Text: Do you agree with the suggested vision for the Borough?

NO

If no, please explain what changes you would like to see and why.

Key points raised in representations

7. Northchurch Parish Council - Is it possible for the Chilterns to remain admired and cherished with all the proposed developments that would encroach into this beautiful countryside? Can the borough supply enough fresh water to all the proposed sites when there are currently substantial supply problems and outages? Mains power outages are frequent in Northchurch, this can only deteriorate with future increased demand. Improvements in the Health Service in Dacorum are required. Will Social housing be affordable or even available in Northchurch and Berkhamsted? Concerns over air quality.

Officer response

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

The development of the Local plan will be informed by a reviews of existing/historic policies and developments to identify any lessons that can be learned.

The provision of infrastructure to support new development will be addressed through the IDP and DtC discussions.

Question Number 4

Question Text: Do you agree with the suggested vision for the Borough?

NO

If no, please explain what changes you would like to see and why.

Key points raised in representations

8. Public Health Service (HCC) - Vision, Objectives and Policy We would request that a new Local Plan should outline the need for an explicit Health and Wellbeing Policy hooks that can set expectations and shape healthy places. We are pleased to see that the proposed vision articulates a clear commitment to health and wellbeing, setting out many of the aspirations that support healthy places and healthy communities. This is also clearly supported in the Plan's objectives under Sustainable Development. Areas for improvement in the Vision, Objectives and Policy Having said that, it is not clear from the plan how the Vision and Objectives will ultimately be delivered through policy; the proposed policy coverage does not explicitly pick up on health and wellbeing. By building health into planning we seek to address some of the causes of poor health from the outset and in this context, a Local Plan should take an approach in its policy setting that balances provisions for a positive, healthy environment alongside the provision of healthcare facilities.

Officer response

Comments noted and will be taken into account in developing the vision.

Health and wellbeing will be further considered as the vision for the Plan is developed. The detailed development of policies from the high level issues and options assessment will address detailed proposals and principles to support health and wellbeing.

<p>9. Hertfordshire County Council (Planning) The vision includes reference to wider use of public transport, which we would support. We support the vision, in particular recognising the areas with most potential for sustainable growth and regeneration in Hemel Hempstead and the need to provide services in the towns and large villages which support sustainable lifestyles and reduced need to travel. We also welcome the desire for healthy and inclusive communities, which a better provision and environment for walking, cycling and public transport will help support. Effective and joined-up policy, planning, development and project implementation is fundamental to achieving this vision for transport. Although the Natural, Historic & Built Environment Advisory Team supports the vision to value the historic environment and to protect it and the desire to retain local distinctiveness, the historic environment should be conserved as well as protected. The historic environment should be properly recognised so that it can be enjoyed. In line with the National Planning Policy Framework and Planning Practice Guidance there is an opportunity to be even more aspirational and locally distinct. There is an opportunity for the vision to set out how the Boroughs natural environment, landscapes, and key green and blue infrastructure assets will be conserved and enhanced to create locally distinct and high quality places, be multifunctional, provide connectivity for people and wildlife, and deliver multiple environmental, social and economic benefits It should be noted that the term 'Watford Health Campus' is not being used anymore, so Watford General Hospital may be more meaningful. The vision – whilst including references to managed</p>	<p>The comments and recommendations are noted and will be taken into account in further developing the vision and the detailed policies and site allocations.</p> <p>The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.</p> <p>The vision and policies will have regard to balance the whole range of material planning considerations including weighing and balancing the complex, complimentary and conflicting issues.</p> <p>The provision of infrastructure to support new development will be addressed through the IDP and DtC discussions.</p>
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Question Number 4	
Question Text: Do you agree with the suggested vision for the Borough?	
NO	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
countryside – is clearly dominated from an urban perspective, possibly because that is the environment where most people will be living. However much of the borough remains rural (85%) and nearly half of high national landscape value as an AONB. This is a characteristic which Herts Ecology would expect to remain in 2036 underpinning the Borough and benefitting rural and urban communities alike, in addition to its intrinsic value for wildlife and ecosystem services.	
10. There should be a greater emphasis on protecting the countryside	The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.
11. There is inadequate highway capacity to support existing and proposed development and levels of congestion are unacceptable	The provision of infrastructure, including highway and transport facilities to support new development will be addressed through the IDP and DtC discussions.

Question Number 4	
Question Text: Do you agree with the suggested vision for the Borough?	
NO	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
12.Green spaces and attractive landscapes need to be protected from development	The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.
13.Green Belt land should be protected from new development	The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.
14.Elderly care has been omitted from the vision	The vision will be reviewed to ensure that it takes into account the housing and other needs of the whole community.
15.Lack of vision around creating walkable/cyclable communities where all facilities, infrastructure and employment can be easily reached.	The vision will be developed to promote sustainable development that gives realistic alternatives to travel by the private car. This will be supported by the evidence base including the IDP.
16.Better use should be made of brownfield sites before looking to develop on green field sites	The Urban Capacity Study will assess the potential for redevelopment within existing settlements including the reuse/redevelopment of previously developed land.
17.The market towns and large villages do not have the infrastructure to support new growth within them or in the surrounding area	The provision of infrastructure to support new development will be addressed through the IDP and DtC discussions.

Question Number 4	
Question Text: Do you agree with the suggested vision for the Borough?	
NO	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
18. Bekhamstead cannot support further development	<p>The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.</p> <p>The Urban Capacity Study will assess the potential for redevelopment within existing settlements including the reuse/redevelopment of previously developed land.</p>
19. Kings Langley cannot support further development	<p>The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.</p> <p>The Urban Capacity Study will assess the potential for redevelopment within existing settlements including the reuse/redevelopment of previously developed land.</p>

Question Number 4

Question Text: Do you agree with the suggested vision for the Borough?

NO

If no, please explain what changes you would like to see and why.

Key points raised in representations

Officer response

20. Tring cannot support further development

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

The Urban Capacity Study will assess the potential for redevelopment within existing settlements including the reuse/redevelopment of previously developed land.

21. Bovingdon cannot support further development

The vision will be developed further as the plan development progresses: it will be considered against the findings and recommendations of the Council's Green Belt review, the provisions of the NPPF, the OAN identified through the Standard methodology and the wider Local Plan evidence base including the Urban capacity Study.

The Urban Capacity Study will assess the potential for redevelopment within existing settlements including the reuse/redevelopment of previously developed land.

Question Number 5	
Question Text: Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovington, or the wider countryside?	
YES	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
1. Little Gaddesden Parish Council – confirm agreement but make no comments	Noted
2. Northchurch Parish Council - But we doubt that the new proposals will be able to deliver them.	Noted
3. The Core Strategy reflects the local aspirations but does not address issues around infrastructure and congestion	Noted; infrastructure and transport matters will be addressed as the plan is developed. The provision of infrastructure to support new development will be addressed through the IDP and DtC discussions.
4. Provision needs to be made for truly affordable housing for local people	The housing Market Needs Assessment will form part of the evidence base and inform the housing mix and tenure mix and advise on appropriate levels of rent to deliver affordable housing. This evidence will inform policy development and any housing specific supplementary planning document(s).
5. Cross boundary issues and impacts associated with development in neighbouring Council areas needs to be addressed and taken into account.	The cross boundary issues and impacts will be considered and addressed through DtC discussions.

Question Number 5	
Question Text: Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovington, or the wider countryside?	
NO	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
<p>1. Markyate Parish Council - The Place Strategy for Markyate is brief, but suggests a stable population. This has certainly not been the result of the implementation of the current Local Plan. The village has had more houses built than the target in that plan and seen a great increase in population, many of whom are commuters. By following the official guidelines, the new houses do not have adequate parking provision and the village is flooded with cars. The Parish Council would welcome a more stable population with any new houses being built to meet the needs of the existing community. We would like to see the promised new surgery and the empty new shops offering some of the services we currently lack. The congestion and parking issues must be resolved. We would like to see the current problems resolved and the needs and practicalities of rural living better appreciated in the new Local Plan</p>	<p>Population growth will be taken into account in policy development and site allocation taking account of historic and potential future changes arising from development proposals.</p> <p>The provision of car parking facilities, infrastructure (including health facilities) will be taken into account through the evidence base, policy development and site allocation.</p>

<p>2. Tring Town Council - Because of its geography, Tring has a strong sense of identity and a strong sense of community. Perpetuating that sense of community is the Town's priority. To achieve this the Town Council has identified five guiding principles to assess any plan for growth. The summary of Tring in the Core Strategy's 'Tring Place Strategy' is succinct and generally still applicable, but the statement * concerning the High Street and local employment is losing credibility. Many of the independent shops in the High Street have closed recently and are being replaced by service outlets. Tring's circumstances are not helped by the major supermarket being on the edge of town. Local employment is being lost as landlords exploit the change in planning legislation giving them permitted rights to change to residential use. This threatens the local economy and, therefore, puts the sense of community at risk. The vision ** for Tring in the Core Strategy is retrospective and needs to be changed to one that is forward looking. To remain successful: Local facilities have to be protected, increased to match changing needs, and delivered in a format that is accessible. Business activity that reflects local needs and skill sets must be encouraged. The vibrancy of the Town centre must be protected. Any new housing should promote a balanced community particularly through the provision of truly affordable housing and of the highest possible environmental standards. Sport and leisure facilities must be increased to match the growth in demand. Provide effective alternatives to car transport through footpaths, cycle ways and public transport.</p>	<p>The comments regarding the guiding principles are noted.</p> <p>Permitted development rights are granted under statutory powers that lie with Central Government rather than DBC. Notwithstanding this the Council has recently made a number of Article 4 directions to limit certain changes of use to residential in employment area within the Borough.</p> <p>Affordable housing will be addressed through the Market Housing Needs Assessment which will inform and support policy formulation.</p> <p>Provision of infrastructure and non-car based transport options and solutions will be addressed through the IDP and DtC and the transport related policies of HCC which will inform policy development and site allocation proposals.</p>
<p>3. HCC The NHBE Advisory Team - notes that chapter 17 in the Core Strategy refers to conserving the historic</p>	<p>Noted: this will be taken into account in developing the vision for the new Local Plan.</p>

Question Number 5

Question Text: Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovington, or the wider countryside?

NO

If no, please explain what changes you would like to see and why.

Key points raised in representations

Officer response

environment. This chapter contains useful information and a sound policy (CS27) which should be continued. The vision and policies for the wider countryside should seek to reflect the intentions of the European Landscape convention (ratified by UK Government in 2004) that states that “Landscape policy” reflects the public authorities’ awareness of the need to frame and implement a policy on landscape. The public is encouraged to take an active part in its protection, conserving and maintaining the heritage value of a particular landscape, in its management, helping to steer changes brought about by economic, social or environmental necessity, and in its planning, particularly for those areas most radically affected by change, such as peri-urban, industrial and coastal areas.’ Hemel Hempstead – the town The Vision needs to reflect the importance of maintaining wildlife corridors through the town to the open countryside, to ensure development within the town or on its periphery does not isolate existing sites or compromise existing corridors.

- 4. There should be an additional comment regarding creating healthy sustainable communities

Noted: this will be taken into account in developing the vision for the new Local Plan.

Question Number 5	
Question Text: Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovington, or the wider countryside?	
NO	
<i>If no, please explain what changes you would like to see and why.</i>	
Key points raised in representations	Officer response
5. All the villages appear to be merging into one another, no separate identity	Noted: this will be taken into account in developing the vision for the new Local Plan.
6. A large number of new houses will put local services under more pressure	Noted: this will be taken into account in developing the vision for the new Local Plan.
7. Green Belt land should be safeguarded from development	Noted: this will be taken into account in developing the vision for the new Local Plan.
8. Existing settlements should not be allowed to coalesce within the Borough or across the boundary into adjacent settlements	Noted: this will be taken into account in developing the vision for the new Local Plan.
9. No account is taken of impact on either the historic or natural environment	Noted: this will be taken into account in developing the vision for the new Local Plan.
10. There is inadequate infrastructure to support existing and proposed development and inadequate consideration has been given to how new infrastructure can be delivered.	Noted: this will be taken into account in developing the vision for the new Local Plan. Provision of infrastructure will be addressed through the IDP and DtC will inform policy development and site allocation proposals.
11. The current core strategy already proposes overdevelopment in the Borough and the new plan goes much further than this	Noted: this will be taken into account in developing the vision for the new Local Plan.

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
YES	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
1. Sport England - Sport England is encouraged that the emerging local plan includes options for Healthy communities and high quality design and would encourage design policies to advocate the use of Sport England's and Public Health England's established Active Design guidance: which encourages developments to be designed to promote active lifestyles through sport and physical activity such as walkable communities and connected footpath and cycle routes. Sport England also supports the inclusion of objective to protect and enhance open space and to provide social, community and leisure facilities and would request that sporting facilities be specified and included within this objective.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
2. Canal and River Trust - the range of topics also reflects the range of topics or themes over which the Canal & River Trust feel that waterways can have an influence.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
3. Little Gaddesden Parish Council – conform support but do not provide supporting comments	Noted

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
YES	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
4. Berkhamsted Town Council - We suggest some textual amendments The 6th bullet point of "Sustainable Development should read: To conserve and enhance the function and character of the towns, villages and countryside. The 2nd bullet point of Infrastructure and Delivery should read: To co-ordinate the delivery of adequate new infrastructure with development.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
5. Northchurch Parish Council - Major parking problems in Berkhamsted. How will the borough attract new business into Northchurch and Berkhamsted?	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan and followed through in the development of parking and transport policy.
6. Dacorum's distinctive landscape needs to be protected but do not see how the plan to build so many new houses in the area is compatible with this vision.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan. Impact on landscape will be addressed through the SA/SEA process and the assessment of individual sites proposed to be allocated for development.
7. Something should be added regarding water and chalk streams.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
8. The objectives reflects the local aspirations but do not address issues around infrastructure and congestion and associated funding of necessary improvements and additions to infrastructure	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan. Infrastructure provision will be addressed through the IDP and site specific conditions associated with individual allocations.

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
YES	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
9. Cross boundary issues and impacts associated with development in neighbouring Council areas needs to be addressed and taken into account.	Noted: this will be taken into account and addressed through the DtC process.
10. The document should be strengthened to protect the character of villages and other settlements	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
NO	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
1. Chilterns Conservation Board - Add an objective on conserving and enhancing the nationally protected landscape of the Chilterns AONB. Also conserving and enhancing the natural beauty of the AONB should be listed in para 4.2.2 as an issue that needs to be addressed on a cross-boundary basis. There is already an established structure for this joint work (the Chilterns Conservation Board) and the process of AONB Management Plan preparation and review to set policy and actions for the AONB.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan. Cross boundary issues will be addressed through the DtC process

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
NO	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
<p>2. Markyate Parish Council - No The Borough Council have not included Greater London among the areas where there is a need for housing provision for their workers. This consultation is essential for all the ring counties and Boroughs around London. There needs to be an acknowledgement that Dacorum is providing homes for many who do not work in the area, but commute, mainly into London; homes for these workers need to be located close to a transport hub, station, underground or bus, such that they can walk or cycle to that hub for their onward journey. Employment opportunities in rural areas, even bigger villages like Markyate are very limited, and bus services are inadequate to serve the needs of anyone working outside the village. Thus all housing in rural areas needs to be to be designed only to meet local needs. Further, social, leisure and community facilities and services need to be provided in the villages as the access to centralised facilities will be largely denied except should they use a car.</p>	<p>Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.</p> <p>Any impacts that may be identified as the Local Plan is developed associated with Greater London will be addressed through the DtC process.</p>

Question Number 6

Question Text: Do you agree with the suggested objectives for the new Local Plan?

NO

If no, please explain the changes you would like to see and why.

Key points raised in representations

Officer response

3. Tring Town Council - 4.2.3. Sustainable Development To promote the towns of Hemel Hempstead, Berkhamsted and Tring as the focus for homes , jobs and strategic services Inclusion of the word ‘homes’ pre-judges the consultation on the distribution of new housing. As already stated Tring is reaching its natural capacity and can only absorb a modest increase in housing. The single bullet point should be replaced with two: Hemel Hempstead retains its pre-eminent position as the Borough’s major population centre and centre for jobs and strategic services To maintain the historic role of Berkhamsted and Tring as market towns serving their surrounding villages as centres of employment and strategic services

Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

No decisions have been made on the nature, allocation or quantum of development. Decisions will be informed by the NPPF, The Local Plan evidence base and DtC discussions.

4. Historic England - We are pleased to see reference to the need to protect and enhance the historic environment within the environment section of the objectives. It is recommended however that the word “conserve” is used rather than “protect”. We also recommend that the historic environment is identified as a key strand in the pursuit of sustainable development within the sustainable development section of the objectives on page 18 of the consultation document.

Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
NO	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
5. St Albans City & District Council - 'Overarching Objectives' – Metropolitan Green Belt. Given the importance of Green Belt in the National Planning Policy Framework (NPPF), it is surprising that the MGB is not mentioned in 'Objectives'.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

Question Number 6

Question Text: Do you agree with the suggested objectives for the new Local Plan?

NO

If no, please explain the changes you would like to see and why.

Key points raised in representations

6. Public Health Service (HCC) - Vision, Objectives and Policy We would request that a new Local Plan should outline the need for an explicit Health and Wellbeing Policy hooks that can set expectations and shape healthy places. A Vision which supports such policy development would ensure that the Local Plan is positively prepared. We are pleased to see that the proposed vision articulates a clear commitment to health and wellbeing, setting out many of the aspirations that support healthy places and healthy communities. This is also clearly supported in the Plan's objectives under Sustainable Development. Areas for improvement in the Vision, Objectives and Policy Having said that, it is not clear from the plan how the Vision and Objectives will ultimately be delivered through policy; the proposed policy coverage does not explicitly pick up on health and wellbeing. By building health into planning we seek to address some of the causes of poor health from the outset and in this context, a Local Plan should take an approach in its policy setting that balances provisions for a positive, healthy environment alongside the provision of healthcare facilities.

Officer response

Noted: this will be taken into account in developing the vision and objectives for the new Local Plan. The specific issues raised will be addressed through policy development informed by the Local plan evidence base and DtC discussions.

Question Number 6

Question Text: Do you agree with the suggested objectives for the new Local Plan?

NO

If no, please explain the changes you would like to see and why.

Key points raised in representations

Officer response

7. HCC the Natural, Historic & Built Environment Advisory Team - support the proposal to include the protection and enhancement of the historic environment as an objective of the local plan as per NPPF paragraph 126. The reference to protecting and enhancing landscape character and delivering high quality design is fully supported. There should be reference to explicit reference to Green Infrastructure. Planning Practice Guidance confirms that it is important to the delivery of high quality sustainable development alongside other forms of infrastructure and identifies that it can help deliver a variety of planning policies relating to the environment, economy and health and wellbeing. Sustainable Development should also include an expectation to maintain and enhance ecosystem services. This issue is greater than just biodiversity itself; it relates to processes such as pollination, flood control, soil erosion, pollution, floodlighting, connectivity etc. Looking after the environment should include support for traditional land management practices which will enable the character of the natural and farmed environment to be maintained.

Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

8. Impacts on the character of existing settlements need to be recognised

Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
NO	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
9. There should be an additional comment regarding creating healthy sustainable communities	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
10. All the villages appear to be merging into one another, no separate identity	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
11. A large number of new houses will put local services under more pressure	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
12. There is too much development proposed across the Borough	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
13. Green Belt land should be safeguarded from development	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
14. Shendish should not be identified as part of Hemel Hempstead	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
15. No account is taken of impact on either the historic or natural environment	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
16. There is inadequate infrastructure to support existing and proposed development and inadequate consideration has been given to how new infrastructure can be delivered.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

Question Number 6	
Question Text: Do you agree with the suggested objectives for the new Local Plan?	
NO	
<i>If no, please explain the changes you would like to see and why.</i>	
Key points raised in representations	Officer response
17. Bekhamstead cannot support further development	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
18. Kings Langley cannot support further development	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
19. Tring cannot support further development	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
20. Bovingdon cannot support further development	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
21. The current Core Strategy recognises the differences and character of each settlement. The proposed new developments will destroy local character and replace hundreds of years of history with characterless developments.	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
22. The proposed objectives are contradicted by the proposed sites which include extensive areas of Green Belt	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.
23. The objectives are very much housing focussed and largely silent on other issues such as employment, retail and infrastructure, including transport and roads	Noted: this will be taken into account in developing the vision and objectives for the new Local Plan.

Question Number 7	
Question Text: Do you agree with proposed policy coverage of the new Local Plan?	
YES	
<i>If no, please set out what issues, topics or policies you think need to be included.</i>	
Key points raised in representations	Officer response
1. Pleased proposed vision shows a clear commitment to health and wellbeing setting out aspirations that support healthy places and healthy communities. (Public Health Services Herts CC)	Noted.
2. Sport England supports inclusion of objective to support and enhance open space and provide social and community facilities	Noted; this will be considered as part of the development of the Local Plan.
3. Support intention to include Development Management policies to replace older Local Plan and Site Allocations document (Hightown Housing Association). Also presents opportunity to update Development Management policies (Taylor Wimpey / Pegasus) – see also Q46	Noted: to be followed up in detailed policy and plan drafting
4. Agree with policies which should give powers to retain specific control with regard to Green Belt and defend it from speculative development.	Noted; any decisions in respect of Green Belt release will be informed by the Green Belt reviews and Site Assessment Study.
5. Policies proposed are fine but are in wrong order (provide jobs and infrastructure before housing) and need prioritising against each other	Noted: sequencing of policies will be reviewed as part of the drafting of the Plan, however, weight attached to a policy is not changed by sequencing in the Plan.

Question Number 7

Question Text: Do you agree with proposed policy coverage of the new Local Plan?

NO

If no, please set out what issues, topics or policies you think need to be included.

Key points raised in representations

Officer response

1. Should be a policy to retain character of settlements outside Hemel Hempstead with greater differentiation between types of settlement and not all “lumped” with Hemel Hempstead. Particularly strong feeling from Bovingdon and Kings Langley residents on this issue.

Settlement Hierarchy takes into account these issues and seeks to differentiate different types of settlement and levels of change. Place strategies in Core Strategy 2013, Site Allocation DPD’s including Site Allocations Statement 2017 address these points, recognising that Kings Langley and Bovingdon (and other settlements) have their own character and historic environment which is to be sympathetically treated if any land allocations are made and any future development proposals are received. Settlements will need to accept a proportionate level of new development taking into account the character of the settlement and existing and future infrastructure capacity. When levels of growth has been settled then the Council can take into account local issues within the Place Strategies.

2. Residents express strong concern that Green Belt and AONB land should be afforded greater protection. Chilterns Conservation Board believes that a standalone policy for the AONB based on the model policy for the Chilterns AONB is best practice.

The Council acknowledges these comments. The Green Belt and AONB are given great weighting in NPPF2 and any release of land and development in these areas would be most carefully considered. The Chilterns Conservation Board’s Management Plan 2014 – 19 has been adopted into the Council’s evidence base.

<p>3. Residents and some parish councils (notably Markyate) raised concerns on infrastructure issues, particularly parking, road congestion, bus and rail provision, and health care are not properly addressed. Frequent reference made to these issues being at breaking point</p>	<p>The Council appreciates the increased pressure on infrastructure that new development brings. SPD being developed for parking provision. Numerous transport and Infrastructure Development Plans set out vision and plans to address extra demands, including Hemel Hempstead Urban Transport Plan 2009, Hertfordshire Transport Plan 2011 – 2031(LTP3), TNBUTP 2013, Infrastructure Delivery Plan 2017 and the SW Herts Growth and Transport Plan is in development. Proposed land allocations seek to recognise locations where these matters are likely to be more suitably addressed. Healthcare provision for Dacorum area will be provided through proposal MU/2 in the Site Allocations DPD.</p>
<p>4. More social and affordable housing needed. Concern expressed regarding high rents and prices in the area. Residents concerned as to how developers will be held to commit to providing more social and affordable homes?</p>	<p>The Council acknowledges that property prices and rents in the area are high. NPPF2 acknowledges the need to provide more affordable homes as well as more homes generally and provides a framework requiring their provision and delivery.</p>
<p>5. Does not give enough sufficient recognition to increased flood risk.</p>	<p>Existing (saved) local plan and Core Strategies do contain provision on this point. Water Cycle Study and SFRA level 1 are nearing completion.</p>
<p>6. Lacking mention of environmental concerns including pollution, climate change mitigation, flooding and water resource</p>	<p>Existing (saved) local plan and Core Strategies do contain provision on these matters. Core Strategy Policies CS28 – 30 make provision for mitigating climate change. AQMA Action plan is being updated to include impact of future development. Water Cycle study and SFRA Level have been undertaken and nearing completion and will inform the new Local Plan.</p>

<p>7. Not enough emphasis on county wide and national infrastructure and cross boundary development and issues.</p>	<p>The Council acknowledges that cross boundary considerations are very important. There is ongoing DtC activity and evidenced by SW Herts JSP, East Hemel development and joint projects such as FRSA and Water Cycle studies.</p>
<p>8. Lacking a coherent policy to strengthen economic prosperity, including the rural economy</p>	<p>Retaining necessary and affordable employment land within DBC area is important in ensuring a successful economy. The Council monitors the amount of employment land available and takes proactive measures to ensure retention of employment land where appropriate.</p>
<p>9. Shendish stated to be part of Kings Langley and Kings Langley should be covered in its own right and not as part of Hemel Hempstead</p>	<p>Most of this is covered in point 1 above</p>

Question Number 8	
Question Text: “Do you agree with the proposed broad approach to distributing new development?”	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Chiltern & South Bucks District Council support the principle/overall approach. Full response found Question 46.	Noted
2. Central Bedfordshire Council suggest that DBC must ensure that the current strategy within the adopted plan is fit for purpose. Current approach is supported.	Noted; the new Local Plan will have its own strategy informed by the evidence base.
3. HCC Development services, Property, Resources; Growth options 1A & 1B would require new educational facilities (additional secondary school capacity). Capability for Dunsley Farm to provide additional secondary school capacity has been found deliverable at a high level in highways terms. Further discussions are welcome relating to the contribution which could be made by the site towards meeting the aspirations of the LP.	Education and other infrastructure needs will be addressed through the IDP and DtC process.
4. Northchurch Parish Council share concerns upon the lack of infrastructure in Northchurch prohibits planned growth. Parking is constantly at capacity near the small shopping facilities on the High Street.	Infrastructure needs will be addressed through the IDP and DtC process.

Question Number 8

Question Text: “Do you agree with the proposed broad approach to distributing new development?”

YES

If no, please explain what alternative approach or changes to our proposed approach you would like and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

5. **Luton Airport** are supportive of ‘settlement hierarchy’ approach. LA to focus new growth on areas that reduce the need to travel, strongly advocating a transport-led approach to development. New growth to be supported by infrastructure requirements. Infrastructure improvements to be expected to concentrate on public transport and road improvements is key. Transport corridors to increase the adaptive capacity to accommodate changes in travel behaviour and growth.

Noted: this will be taken into account in implementing the vision and objectives for the new Local Plan and developing strategic and detailed policies.

Infrastructure needs will be addressed through the IDP and DtC process.

Provision of transport infrastructure and non-car based transport options and solutions will be addressed through the IDP and DtC and the transport related policies of HCC which will inform policy development and site allocation proposals.

6. Various organisations supported the settlement hierarchy approach in principle, however suggested different approaches to distributing growth across the Borough.

Noted: this will be taken into account in implementing the vision and objectives for the new Local Plan and developing strategic and detailed policies.

Question Number 8	
Question Text: “Do you agree with the proposed broad approach to distributing new development?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Little Gaddesden Parish Council share concerns that Little Gaddesden village is suggested to change to being considered as a small village rather than an undesignated village. The lack of services/infrastructure in the area means it is not suitable for development. Growth should be directed at areas where travel can be minimalised between schools and jobs. Little Gaddesden fails to meet the criteria for the settlement hierarchy.	Noted; the comments will be reviewed and taken into account as policy around settlement hierarchy is developed. General infrastructure provision will be addressed through the IDP
2. Chilterns Conservation Board state that levels of growth need to take into account encroachment on the AONB. Refers to NPPF paragraph 115.	Noted; Impacts on the AONB and setting of the AONB will be taken into account in the Site Assessment Study and any further work to assess the suitability or otherwise of sites for development and the form and quantum of development that may be appropriate. Such assessment will include LVIA for sensitive sites.

Question Number 8

Question Text: “Do you agree with the proposed broad approach to distributing new development?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

3. **Berkhamsted Town Council** suggest that the current approach does not conserve the character of existing market towns with growth to date unsupported by improvements to infrastructure in growth areas. Building rates in Berkhamsted and Northchurch higher than in Hemel Hempstead between 2006 & 2016. Current allocation ignores ‘spill over affects’ from new growth on neighbouring settlements, e.g. LA3 in HH affecting Berkhamsted. Planning for development should not be an arithmetic exercise when distributing growth numbers.

Noted; The cumulative impacts of development will be taken into account in the Site Assessment Study and the Infrastructure Delivery Plan and the assessment of the visual impact of any development proposal. Such assessment will include LVIA for sensitive sites.

4. **Markyate Parish Council** states that the Markyate settlement has accepted levels of growth beyond the targets set. The Parish Council also raise concerns that new infrastructure in Markyate has still not been delivered despite new growth in the area, with particular issues regarding parking in the evenings. Markyate village is suggested to be unsuitable to meet the needs of commuters.

Noted; The cumulative impacts of development will be taken into account in the Site Assessment Study and the Infrastructure Delivery Plan and the assessment of the visual impact of any development proposal. Such assessment will include LVIA for sensitive sites.

The transport and highways impacts of new development will be addressed through the IDP and traffic/transport modelling (such as the COMET model) to identify capacity and impact issues.

Question Number 8

Question Text: “Do you agree with the proposed broad approach to distributing new development?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

5. **Tring Town Council** raise concerns over capacities in each settlement within the Borough to support new growth. The option of new settlements should be considered. A variety of clear options need to be explored. Constraints such as Green Belt and Chiltern’s AONB prevents Dacorum from delivering certain levels of growth.

Noted; The cumulative impacts of development will be taken into account in the Site Assessment Study and the Infrastructure Delivery Plan and the assessment of the visual impact of any development proposal. Such assessment will include LVIA for sensitive sites; to include potential impacts on the AONB.

No options for delivering development (including) a new settlement have been ruled out at this time.

6. **Historic England** state that DBC must maintain historic assets when considering new growth. Opportunities for enhancements on existing neighbourhoods should be a priority. Densities should also be considered and the impact this has on local character/historic assets. Conservation Area Appraisals should be used to help assess suitability for development.

Noted: all of the issues will be taken into account, assessed and weighed in the assessment of new development proposals and allocation of sites.

7. **St Albans Diocesan Board of Finance** raise issues regarding the clarity of options for growth in the Borough. DBC must be clear on what growth options are sustainable and therefore deliverable. The Council’s main focus should be making efficient use of land. Larger settlements are most sustainable locations for supporting new growth.

The sustainability of the plan (including any sites proposed for development) will be addressed through the whole plan SA/SEA.

Question Number 8	
Question Text: “Do you agree with the proposed broad approach to distributing new development?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
8. BRAG alongside other organisations support the settlement hierarchy approach however suggest alternative methods to distribute growth across the Borough. Concerns over loss of character of market towns due to growth were raised. A consensus that new growth to areas should encourage economic vibrancy of the area and be supported by necessary infrastructure requirements.	Noted: no decisions have been made at this time regarding the distribution of development and alternative scenarios will be considered. The plan will seek to deliver sustainable development in accordance with the principles set out in the NPPF balancing economic, social and environmental objectives.
9. The Local Plan should address the potential loss to local biodiversity in the face of new growth. Development sites within Kings Langley and Hemel Hempstead were raised, and were suggested to be adding to the loss of flora and fauna in the Borough.	The impact on biodiversity will be addressed through the SA/SEA process and any impacts on designated or protected sites will be addressed through the HRA and AA where necessary.

Question Number 9	
Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Objecting	
Key points raised in representations	Officer response
1. Buckinghamshire County Council would like to see that the Green Belt is protected in accordance with the National Planning Policy Framework and guidance notes.	Green Belt will be safeguarded in accordance with the NPPF and other material planning considerations. Any decisions on proposals for development in the Green Belt will be informed by the Part 1 and 2 Green Belt Studies. Further finer grain Green Belt Study will be commissioned should smaller sites be proposed for release in the Green Belt.
2. Berkhamsted Town Council believe that this underplays the major role of the Green Belt in preventing urban sprawl and maintaining open space, and that both stages of the Green Belt review are flawed. They are in strong agreement that there needs to be consideration regarding the sustainability of the proposed sites in terms of infrastructure availability, accessibility, health and well-being purposes. These should also consider settlement character and that some settlements are much more constrained such as their proximity to the Chilterns AONB	Green Belt will be safeguarded in accordance with the NPPF and other material planning considerations. Any decisions on proposals for development in the Green Belt will be informed by the Part 1 and 2 Green Belt Studies. Further finer grain Green Belt Study will be commissioned should smaller sites be proposed for release in the Green Belt. The plan will be subject to a comprehensive SA/SEA and significant sites proposed for development in proximity to the AONB will be subject to LVIA.

Question Number 9	
Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Objecting	
Key points raised in representations	Officer response
3. Markyate Parish Council are in general agreement with policy, however they are concerned about the Green Belt surrounding the village and urban sprawl with concern about other neighbouring authorities and encroachment towards the village. Development within Markyate itself is difficult due to issues of flooding and hillside development is impractical and that active travel options into the village centre need to be promoted.	Noted: these comments will be taken into account. The detailed points will be addressed through the Local Plan Evidence base; flood risk will be considered through the SFRA level 1 and level 2.
4. Tring Town Council do not support the proposal that land does not meet all 5 NPPF principles should warrant the removal of its designation, other qualities such as conserving settlement character should be considered specifically at sites Tr-h1 and Tr-h6	Noted: these comments will be taken into account and weighed along with other material planning considerations as the Local Plan is developed.
5. Aylesbury Vale District Council believe that another Green Belt Review should be undertaken in light of the higher than anticipated growth levels. They also mention whether Green Belt release in Kings Langley can be justified in alignment with NPPF Green Belt policy.	A stage 1 and 2 Green Belt Review has been carried out for the whole of Dacorum. A stage 3 review may be commissioned should it be proposed to allocate/release smaller sites for development in the Green Belt.

Question Number 9	
Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Objecting	
Key points raised in representations	Officer response
6. Historic England believe that the historic value of land should be a consideration of the Green Belt review in accordance with the NPPF. The value of the land and historic settlements need to be considered together in conserving these special qualities and open character. They also raise the point that parcels of land need to be considered collectively in protecting character.	Noted; the Green Belt Reviews have been carried out in line with best practice and have had full regard to the policy and guidance set out in the NPPF. A stage 3 review may be commissioned should it be proposed to allocate/release smaller sites for development in the Green Belt.
7. Central Bedfordshire Council support the retention of Green Belt land, however it needs to consider the higher than anticipated growth levels and that this will mean that further Green Belt release will be needed further across the Borough.	Noted; decisions on releasing Green Belt land will be informed by the OAN housing figures and the wider provisions of the NPPF.
8. Northchurch Parish Council feel that Green Belt should prevent urban sprawl and retain open space	Noted: this reflects the purposes of Green Belt set out in the NPPF
9. St Albans City and District Council feel that the relationship between this and the Green Belt review process is not clear. The role of Green Belt restraint is to encourage urban regeneration and development beyond the Green Belt, which does not appear to have been considered.	The Local Plan evidence base will include a thorough assessment of Urban Capacity and this will inform any proposed Green Belt release in addition to the Green Belt Study. All development options will be assessed for their levels of sustainability as part of the SA/SEA process.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Objecting

Key points raised in representations

10. **Berkhamsted Residents Action Group** believe that this underplays the importance of Green Belt land in protecting against urban sprawl and settlement merger and that the Green Belt Reviews are flawed. They feel that the chosen sites should be large and self-supporting and the decision on village boundaries should be revisited. Similarly, they believe there should be consideration regarding the sustainability of each site such as infrastructure, accessibility and its health benefits before any allocations are made, and as such more weight should be given to developments around Hemel Hempstead where development can be better supported. Other points raised were that sites should not be grouped together but assessed individually, that major developed site should be situated away from existing settlements and any proposals will need to have consideration of the settlement character

Officer response

No decisions have been made at this time; the consultation was on issues and options and did not propose any specific policies or allocations. All comments received will be considered in the development of Local Plan policies and site allocations.

The Green Belt reviews have been carried out in accordance with best practice by experienced specialist consultants.

Sustainability of the plan and individual sites will be addressed through the SA/SEA process.

The site assessment study is looking at both the individual and cumulative impacts of potential development sites.

The allocation of any sites will be made having regard to all material planning considerations and the weighing of those considerations in light of the NPPF, the Local Plan Evidence base and other material documents.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Objecting

Key points raised in representations

11. **Grove Fields Residents Association** and other respondents feel that the Council have not complied with Government guidance in the Housing White Paper in that there has been sufficient evidence that brownfield sites have been used and/or exhausted before Green Belt can be released. They also feel that the Green Belt review is flawed in its methodology approach using the NPPF principles as a starting point and has not considered that the sites in Tring are more sensitive to maintaining the openness of Green Belt and are not suitable due to them being agricultural land and forming important wildlife corridors as well as other factors that should be considered such as their proximity to AONB and reservoirs.

Officer response

The Local Plan evidence base will include a thorough assessment of Urban Capacity and this will inform any proposed Green Belt release in addition to the Green Belt Study.

Sustainability of the plan and individual sites will be addressed through the SA/SEA process.

The allocation of any sites will be made having regard to all material planning considerations and the weighing of those considerations in light of the NPPF, the Local Plan Evidence base and other material documents.

Impacts on the AONB and setting of the AONB will be taken into account in the Site Assessment Study and any further work to assess the suitability or otherwise of sites for development and the form and quantum of development that may be appropriate. Such assessment will include LVIA for sensitive sites.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Objecting

Key points raised in representations

12. **Kings Langley & District Residents Association** do not feel that there has been any guidance on what should constitute exceptional circumstances for Green Belt release and therefore do not agree with the outcomes of the Green Belt review on parcel GB14B. They feel that there is no case for its release and does not consider that this would result in the merger of Hemel Hempstead and Kings Langley or the issues of infrastructure or settlement character, and that development should be focused on the main towns to assist with urban regeneration. They also feel that there should be duty to co-operate with Three Rivers about any housing and how this could contribute to Dacorums housing numbers.

Officer response

The Green Belt reviews have been carried out in accordance with best practice by experienced specialist consultants.

The Local Plan evidence base will include a thorough assessment of Urban Capacity and this will inform any proposed Green Belt release in addition to the Green Belt Study.

Sustainability of the plan and individual sites will be addressed through the SA/SEA process.

The allocation of any sites will be made having regard to all material planning considerations and the weighing of those considerations in light of the NPPF, the Local Plan Evidence base and other material documents.

The allocation of any sites will be made having regard to all material planning considerations and the weighing of those considerations in light of the NPPF, the Local Plan Evidence base and other material documents.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Objecting

Key points raised in representations

Officer response

13. Many respondents feel that the Green Belt has to be protected and that this designation should not be able to be removed as it prevents urban sprawl and is important in tackling the issues of pollution and providing space for biodiversity and wildlife. It retains a buffer for the Chilterns Area of Outstanding Natural Beauty and is a useful community asset for health and well-being.

The Green Belt reviews have been carried out in accordance with best practice by experienced specialist consultants.

The NPPF allows for Green Belt release in exceptional circumstances; release of green belt is not, therefore, contrary to policy in principle but any proposals must be fully and carefully weighed against the green belt purposes set out in the NPPF and other material planning considerations.

14. Many respondents feel that infrastructure (physical, social, and green), accessibility and employment issues or the sustainability of sites should also be considered as part of the Green Belt allocation process. They believe that this should then focus on providing large sites that can accommodate these needs rather than on small Green Belt sites. It was suggested that this could be met by the large towns or establishing entirely new settlements.

Infrastructure provision will be addressed through the IDP.

The sustainability of any policies or site allocations will be addressed through the SA/SEA.

The development strategy will be informed by a range of evidence including the Site Assessment Study and Urban Capacity Study.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Objecting

Key points raised in representations

Officer response

15. Some respondents believe that if Green Belt development has to come forward this should be used as a way to ensure greater levels of affordable housing asking that at least 50% of units built in the Green Belt should be affordable and over half of this should be social housing, which would provide for those most in need in the community (young, elderly, those working in care/services).

The mix of house types and tenures (including affordable) will be informed by the LHNA. The viability assessment of the whole plan and site typologies will address the quantum and mix of affordable tenure types that can be provided on allocated sites.

The provision of affordable homes will be balanced against other needs such as infrastructure requirements identified in the IDP to support developments which will also be taken into account in the viability assessment work.

16. Respondents feel that there should be consideration of how this will effect existing settlements not only in infrastructure and transport issues, but also in how Green Belt release would openness, settlement character and quality of life particularly in the more rural and/or historic settlements (Kings Langley, Bovington, Berkhamsted and Tring).

Individual impacts will be looked at through specific evidence such as IDP, LVIA and Green Belt Studies. The Cumulative impact of developments will be assessed through the SA/SEA.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Objecting

Key points raised in representations

Officer response

17. Respondents feel that what constitutes exceptional circumstances for Green Belt release is confusing as there is no evidences or justified examples of what this would be. However they are in strong disagreement that housing numbers should be considered an exceptional circumstance.

Noted; any Green Belt release will be supported by evidence and will take full account of the policy in the NPPF, the Local Plan evidence base and be addressed in the SA/SEA.

18. A number of developers feel that the Green Belt reviews are flawed in their assessment of Green Belt sites, either in that they do not correctly interpret the policies in the NPPF, or put greater weight or use justification for Green belt retention that is inconsistent with the national policy.

The Green Belt reviews have been carried out in accordance with best practice by experienced specialist consultants.

19. Consideration of Borough not being able to meet need, due to constraints of Green Belt and other designations, believe that the Housing White Paper allows for this or how this could be meet by other authorities. Similarly, respondents also feel that the Housing White Paper specifies that the views of local people should be given greater weight in the plan making process.

The NPPF sets out how LPAs should assess their OAN using the Standard Methodology. The guidance in the NPPF also addresses the release of Green Belt land.

Question Number 9	
Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Supporting	
Key points raised in representations	Officer response
1. Sports England and Tring hockey club suggest that Green Belt policy should take a more positive approach to changing the Green Belt land into outdoor sport land, which would help communities provide new and enhanced facilities to meet needs identified by the Council, current policy requires exceptional circumstances to amend Green Belt to justify change to outdoor sport land.	Noted: The NPPF contains specific advice on outdoor sport and recreation use in the Green Belt and this will be given full weight in the allocation of sites and setting of policy.
2. Chilterns & South Bucks District Council would like to have greater involvement in the future proposals for Bovingdon prison in case there are any infrastructure issues that may affect the Chiltern District.	Noted: This will be addressed through the DtC process
3. Hertfordshire County Council- Development services , property, resources support the approach of the Green Belt review but believe that there should be further integration of the Stage 2 Green Belt and landscape review to ensure its conclusions are robust and whether these sites are sustainable and able to provide the necessary infrastructure to support development.	Noted: All relevant evidence will be assimilated and weighed, including identifying common themes and linkages. Infrastructure needs will be addressed through the IDP. The overall sustainability of the plan and of individual policies and proposals will be assessed through the SA/SEA

Question Number 9	
Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Supporting	
Key points raised in representations	Officer response
4. Hertfordshire County Council believe that Green Belt release will need to take into account how accessible and sustainable these locations would be. They support the idea of using Green Belt for multiple uses, and the Landscape institutes proposal to include Green Belt as part of the wider green infrastructure framework.	The overall sustainability of the plan and of individual policies and proposals will be assessed through the SA/SEA
5. Many developers and land owners agree with the principles proposed by the Council that land that performs poorly in relation to the 5 NPPF principles can be removed from the Green Belt. However the Crown estate also believes that more emphasis should be placed on the sustainability of sites even if this is in areas of stronger performing Green Belt land.	Noted; any Green Belt release will be supported by evidence, including the Green Belt studies and will take full account of the policy in the NPPF, the Local Plan evidence base and be addressed in the SA/SEA. The overall sustainability of the plan and of individual policies and proposals will be assessed through the SA/SEA
6. Some respondents feel that some development in the Green Belt is acceptable particularly around villages, which would help with settlement viability and meeting the housing need of these communities.	Noted: the merits of different sites will be weighed against material planning considerations. The merits of any proposals and potential benefits will be assessed against the principles of sustainable development set out in the NPPF.

Question Number 9	
Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Supporting	
Key points raised in representations	Officer response
7. Many respondents feel that current policy should be retained as this would have an impact on the openness of the countryside and settlements leading to settlement merger, and is important in helping to protect biodiversity and environmental designations.	Current policy, in the Saved Local Plan policies, the Core Strategy and Site allocations has to be reviewed in the context of changing circumstances including the latest iteration of the NPPF and particularly the Standard Housing Methodology. Existing policies will be reviewed for compliance with the current NPPF and may be retained or updated. LPAs are under a statutory duty to refer their Local Plans every five years.
8. Concerns were raised about the availability of infrastructure for any development that would take place on the Green Belt. A key issue was the accessibility of the sites in terms of transport and road capacity.	The IDP will assess the needs for new or additional infrastructure to support any development that may be allocated in the Green Belt (or elsewhere within the Borough).
9. Some respondents raise concerns about how sustainable growth will be particularly with the issues of building on Green Belt land and balancing these needs	The sustainability of development (or otherwise) against the principles of sustainable development set out in the NPPF will be addressed through the SA/SEA

Question Number 10	
Question Text: Do you agree with the proposed approach to the Rural Area summarised above?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
<p>1. Little Gaddesden Parish Council wish to remain as an undesignated village, due to the issues they face with infrastructure availability, and the limited possibility of providing local employment.</p>	<p>The Council acknowledge these comments and understand the concerns raised. The purpose of the Issues and Options document was to identify the areas that were of most concern to the community.</p> <p>The Council has produced an Infrastructure Delivery Plan, which will determine the levels of infrastructure provision required for a development. However, this would be subject to further site assessment work being carried out to ensure that the level of growth can be accommodated. While the Council can allocate some land for local employment it is unlikely that it would fulfil this use and would go against many of the principles of sustainable development. The Council will consult with the relevant bodies to address the concerns raised should development in this area come forward.</p>

Question Number 10	
Question Text: Do you agree with the proposed approach to the Rural Area summarised above?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
2. Berkhamsted Town Council and Northchurch Parish Council would like specific policy within the Local Plan that relates to the Chiltern Area of Outstanding Natural Beauty.	<p>The Council acknowledge this and appreciate the importance of the Chilterns Area of Outstanding Natural Beauty for the Borough.</p> <p>Policy relating to valued landscapes and more specifically the Chilterns Area of Outstanding Natural Beauty will be reviewed as part of the Local Plan process and amended as necessary to ensure these areas are protected.</p> <p>Currently the Council use policies within the 2004 Local Plan and the AONB management plan 2014-2019 for any development near these designations. These will continue to be used as they are updated to ensure the AONB is protected. The Council acknowledge that there may be need to include a specific policy for the protection of the Chilterns AONB and will be considered if there is an identified need.</p>
3. Markyate Parish Council request that the same principles applied to the Green Belt are also applied to the Rural Area	The Council acknowledge these comments. It is within the Councils interest to treat the Rural Area in a similar way to the Green Belt, as it does not perform well in providing sustainable locations for development.

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations	Officer response
4. Hertfordshire County Council suggest that the Rural Area outside of the Green Belt and Chilterns Area of Outstanding Natural Beauty would not provide sustainable location for development and so should be treated in the same way as the Green Belt.	The Council acknowledge these comments. The proposed approach is to retain the Rural Area in a similar way to the Green Belt for the reasons described in the response.
5. Berkhamsted Residents Action Group and Berkhamsted Citizens Association would like to see strengthened policy on Chilterns Area of Outstanding Natural Beauty.	The Council acknowledge this, there are currently policies in place that protect the Area of Outstanding Natural Beauty such as the AONB management plan 2014-2019 which has been adopted into our evidence base. The current policies being used are to be reviewed to ensure they reflect this and ensure that the AONB is protected. The Council acknowledge that there may be a need to introduce a policy specifically on the Chilterns AONB and will be subject to further discussion.

Question Number 10**Question Text: Do you agree with the proposed approach to the Rural Area summarised above?****YES**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

6. Villages Foundation believe that the Rural Area should not have the same level of protection as Green Belt

Officer response

The Council acknowledge this and appreciate the need for development in smaller settlements to retain viability in relation to the National Planning Policy Framework principles. There will likely be a need to include limited development within these village locations to provide for their locally assessed housing needs, this will be reviewed as part of the Strategic Housing Market Assessment, which the Council is in the process of updating.

However, it also needs to be considered that extensive development in these areas would be inappropriate in that it would fail to retain settlement character, and whether infrastructure would be able to support development. These issues will be considered through our urban capacity work and infrastructure delivery plan.

The Issues and Options consultation will help to determine where and how development should be distributed in relation to the future growth options proposed.

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

7. Respondents believe that these areas should be protected as they prevent urban sprawl

The Council acknowledge this and aim to protect these areas for the purpose mentioned within responses.

It has already been determined that the Rural Area would only be able to provide a limited number of housing as it would perform poorly in sustainability principles. However, some development maybe necessary in village locations to meet their housing needs. This will be informed by the Strategic Housing Market Assessment, which the Council is in the process of updating.

8. There should be protection of agricultural land

The Council acknowledge these comments and aim to protect these areas of land as is most appropriate.

Should areas of agricultural land come forward for development the Council would aim to offset the impact that this would have through financial contributions from the developer, or try to replace this land where possible.

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

9. Consideration of a new village to meet housing need as there is the argument that many of the settlements within the Borough would be unable to support proposed growth levels.

The Council acknowledge these comments, however due to the various land constraints within the Borough it would prove difficult to find such a site outside of the existing settlements. As part of the site assessment work, it will be considered whether settlements could support this growth through the infrastructure delivery plan. The Council will also consult with the relevant stakeholders regarding the sites promoted.

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Chilterns Conservation Board** state that there should be policy relating specifically to the Chilterns Area of Outstanding Natural Beauty and that this should be given greater weighting than Green Belt.

The Council acknowledge these comments, and appreciate the importance of the Chilterns Area of Outstanding Natural Beauty for the Borough. The AONB is considered an environmental designation and so is protected by existing policy within the Councils documents and this will continue to be the case in the new Local Plan.

The Council is unable to designate areas of land at different weights as ultimately this is down to National Government guidance as to how this is protected. However, the AONBs status as a national designation means that it has a great weight that would restrict any development. This would also be subject to the AONB management plan 2014-2019 that has been adopted into the Councils evidence base.

The Council acknowledge that there may be an identified need for a specific policy on the Chilterns AONB and will be subject to further discussion.

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

2. **Tring Town Council** raise the possibility of a new village, and argue that housing needs cannot be met within existing settlements.

The Council acknowledge this comment. The proposal to provide a new village to satisfy housing needs would be difficult to implement due to the amount of land necessary and the many land constraints that exist within the Borough. This would require consultation with neighbouring authorities, Hertfordshire County Council and utility providers to determine whether such a scheme would be feasible.

In relation to the housing need within existing settlements. The Council would aim to further assess the capacity of the settlements within the Borough to determine whether housing numbers can be accommodated which will be done through our urban capacity study, and our infrastructure delivery plan.

Question Number 10		
Question Text: Do you agree with the proposed approach to the Rural Area summarised above?		
NO		
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>		
Key points raised in representations	Officer response	
3. Historic England suggest that a policy is needed to protect the historic environment in the Rural Area.	<p>The Council acknowledge this and understand the importance of protecting the historic environment. The Council plan to carry across all policy relating to the historic environment into the new Local Plan and update this to cover as many designations as possible. It is therefore not necessary to produce a specific policy for the rural area, as this policy will cover the entire Borough. Further consideration of this would be given through our site assessment work through the development management policies used in the planning application process.</p> <p>Historic England as a statutory consultee will be referred to through the allocation process, when there is potential of historic assets being identified.</p>	
4. St Albans City & District Council do not believe that the Rural Area should be treated in the same way as Green Belt as it could provide future developable land.	<p>The Council acknowledge this, however the Rural Area performs poorly in relation to the sustainability objectives and so is not a favourable location for future development. Some Green Belt land on the edge of existing settlements performs better and this is likely where housing would be promoted.</p> <p>The Council will further consult with its statutory consultees to address the concerns raised within representations, to better inform any development going forward.</p>	

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

5. **Berkhamsted Residents Action Group, Berkhamsted Citizens Association and Grove Fields Residents Association** state that the Rural Area should be assessed in a similar way to Green Belt land. This would better inform the potential harm development could have on the surrounding area.

The Council acknowledge this, although the Rural Area is not formally assessed in the same way as Green Belt the policies that would relate to it would very much be the same.

The potential harm of development would be assessed through development management policies in the planning application stage were plans in these areas to go forward.

<p>6. Kings Langley & District Residents Association state that there should be limited development in villages and this should be based on settlement character rather than settlement size. They also state that there has not been sufficient justification to release Green Belt land where brown field sites have not been properly considered.</p>	<p>The Council acknowledge this, the proposed approach to site allocations was to follow the Settlement hierarchy and the Locational Principles detailed in the Issues and Options consultation. This is on the presumption that these larger settlements will be able to better manage growth because of the availability of infrastructure and the services and facilities to support it.</p> <p>The Council appreciate that further consultation would be required to understand the issues presented by development within the individual settlements and would be addressed accordingly with all of the relevant stakeholders. There would also be consideration of the implications development would have on settlement character and would aim to preserve these special qualities for the settlements. The Council is currently conducting a urban capacity study to review this and will be reflected within the new Local Plan.</p> <p>The need to release Green Belt land is due to the difficulty of predicting when these windfall (Brownfield) sites would become available. These sites would be favoured for development, however there would still likely be a need to release Green Belt land, because it may be inappropriate in retaining settlement character, or lack the infrastructure to support development.</p>
<p>7. Respondents claim that considering the Rural Area in a similar way to Green Belt goes against NPPF principles and that the Green Belt should only be extended in exceptional circumstances.</p>	<p>The Council acknowledge these comments, although the Rural Area is to be treated in the same way as the Green Belt this is only due to the impracticalities of the land, such as its limited ability to provide sustainable locations for development. The land has not been designated in the same way, as Green Belt is allocated through National Government guidance.</p>

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

	This means that the Rural Area does not follow the principles of the Green Belt in the National Planning Policy Framework, and therefore does not constitute as an extension of the Green Belt.
8. Responses from BRAG that policies on the AONB must be strengthened.	The Council acknowledge these comments and plan to replicate and update all policy relating to AONB so that it is consistent with the latest AONB management plan which has been adopted into our evidence base.
9. Responses from residents claiming that Berkhamsted and Tring have been subject to substantial growth whereas Hemel Hempstead has not.	<p>The Council acknowledge these comments. The development of these sites has been the result of as and when developable land has become available, and so by nature of these windfall sites it is difficult to actively plan where development should take place.</p> <p>It is anticipated that the new Local Plan will respect the settlement hierarchy and so further development in Hemel Hempstead will come forward, however this is subject to the decisions that come forward from the Issues and Options consultation which will help to inform decision for allocations coming forward.</p>

Question Number 11

Question Text: Do you agree with the proposed approach to selecting sites?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. The Council needs to actively consider larger strategic sites and sites of above 3,000 homes as they provide the opportunity to secure future high levels of new homes and necessary infrastructure, and avoid piecemeal change to settlements. A number of respondents have referred to the latter option as part of comments made by the Berkhamsted Residents Action Group (BRAG).

The site assessment Study is looking at sites of many different sizes including larger sites that individually or collectively can accommodate several hundred, or in one case several thousand dwellings.

All development will be assessed against sustainability principles and the individual sites will be subject to SA/SEA. This should ensure that development is properly planned and does not represent a piecemeal approach.

2. The Green Belt should be safeguarded against development to protect the character/identity/urban sprawl of the towns and villages, their surrounding countryside, farmland and wildlife, and to prevent their merger/coalescence with other settlements. Consequently, a number of detailed objections have been raised to a variety of sites in the towns and villages currently being promoted through the Issues and Options stage.

Green Belt will be safeguarded in accordance with the NPPF and other material planning considerations. Any decisions on proposals for development in the Green Belt will be informed by the Part 1 and 2 Green Belt Studies. Further finer grain Green Belt Study will be commissioned should smaller sites be proposed for release in the Green Belt.

The plan will be subject to a comprehensive SA/SEA and significant sites proposed for development in proximity to the AONB will be subject to LVIA.

Question Number 11	
Question Text: Do you agree with the proposed approach to selecting sites?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
3. Wide support for prioritising and maximising the contribution from brownfield sites including permitting more changes of use, higher densities and taller buildings (particularly in Hemel Hempstead), the reuse of empty buildings, re-occupation of vacant homes, development of surplus public-sector land and conversion of properties to housing.	The Urban Capacity Assessment will identify and quantify the potential for accommodating the OAN within existing settlement boundaries.
4. The Council needs to take account of the cumulative impact of small sites and windfalls on local infrastructure, particularly in Berkhamsted and Tring.	Individual impacts will be looked at through specific evidence such as IDP, LVIA and Green Belt Studies. The Cumulative impact of developments will be assessed through the SA/SEA.
5. Development of garden land should be discouraged.	The Urban Capacity Study will assess the suitability of sites for development. The NPPF does not support a blanket ban on the development of garden land but does highlight its importance and recommends policy be developed to objectively assess any proposals for development.
6. Minor support for exploring the contribution from a new settlement (including Garden Towns), rather than overloading existing settlements.	Noted; this is an option that can be considered in setting the growth strategy.
7. Infrastructure (roads, schooling, health facilities, etc.) needs urgently addressing and before new development is allocated / comes forward.	The infrastructure needs arising from new development will be addressed through the IDP.

Question Number 11	
Question Text: Do you agree with the proposed approach to selecting sites?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
8. Priority should be given to expanding the towns before the villages.	Noted; this is an option that can be considered in setting the growth strategy.
9. The CAONB and Rural Area should also be protected from new development.	Noted: This will be addressed in the development of the Local Plan and will be informed by the evidence base including LVIA and Green Belt studies.
10. Reference has been made to a number of alternative brownfield sites within and outside the Borough that should be considered.	Noted: The Urban Capacity Study will look at possible development sites that constitute brownfield or previously developed land; this process will also be informed by the Council's published Brownfield Register.
11. Minor support for the selection approach and greenfield development (often seen as a last resort), but the latter needs to be properly planned for away from sensitive areas and in sustainable/accessible locations.	Noted: Any Green Belt allocations will be informed by the Green Belt Studies and the need to meet the OAN that cannot be addressed through sites identified in the Urban Capacity Study.
12. The selection process is not rigorous, requires more detailed criteria, and seems to omit mention of anything related to the ability of the area to support new development through infrastructure and resources, a detailed cost analysis of sites, an assessment of optimal locations, and their suitability/quality.	The Site Assessment Study will comprise a detailed site by site assessment against a range of criteria and will provide a rigorous and consistent review of site suitability. Any sites chosen for further consideration will be subject to further detailed site specific review and testing.
13. The Council should explore the option of other authorities meeting Dacorum's housing requirements ahead of Green Belt development.	This will be addressed through the DtC process but must be supported by evidence to demonstrate that DBC cannot meet its OAN.

Question Number 11

Question Text: Do you agree with the proposed approach to selecting sites?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations	Officer response
14.A number of landowners have made representations in support of the release of their land from the Green Belt for a variety of reasons, including their overall suitability and contribution to meeting growth.	The Site Assessment Study will comprise a detailed site by site assessment against a range of criteria and will provide a rigorous and consistent review of site suitability. Any sites chosen for further consideration will be subject to further detailed site specific review and testing.
15.Small windfall sites of fewer than 10 dwellings should not be discounted.	All potential sites will be taken into account in setting the housing trajectory to demonstrate how the OAN will be met and the delivery profile for new homes. This will take account of all sizes of site and an allowance for smaller windfall sites of less than 10 dwellings.
16. The Chilterns Conservation Board Support the approach to maximise use of brownfield sites, and identifying the AONB as a very important factor in assessing where development should be located. It recommends the Council undertakes further detailed work on the impacts of developing sites (both individually and cumulatively) on the Chilterns AONB. They would be willing to assist with the scope and brief for such work, which should include landscape and visual impact assessment as well as coverage of effects on tranquillity, ecology, water abstraction from chalk streams, air quality, dark skies etc.	Noted: This will be addressed through the DtC process; the importance of the AONB and the need to maximise the use of brownfield sites is acknowledged. The Urban Capacity Study will look to maximise the potential of such sites before Green Belt sites are considered, in line with the principles set out in the NPPF.

Question Number 11

Question Text: Do you agree with the proposed approach to selecting sites?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

17. Brownfield sites should not be at the expense of the loss of existing small businesses and their important local contributions.

Noted: the Local Plan will be formulated having full regard to the NPPF and the definition of sustainable development contained therein including the balancing three strands of Social, Economic and Environmental.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response
1. Sport England would encourage the inclusion of a design policy which encourages developments to promote active travel through sport and activity such as walking and cycle routes	The council acknowledges these comments and supports the principles of active travel via various means. We would seek to take these forward as appropriate in preparing the Local Plan and in identifying future development proposals and potentially through working with other agencies.
2. Canal & River Trust consider the Grand Union Canal and its arms as important aspects to provide local accessibility, ie Cycle routes and walking routes along towpaths and routes to town centres	The Council acknowledges the direction provided by Canal & River Trust and support the principles of active travel connected to the Grand Union Canal and its arm via various means. We would seek to take these forward as appropriate in preparing the Local Plan and in identifying future development proposals and potentially through working with other agencies.
3. Transport for London note the transport issues in relation to capacity of mainline west coast rail service. HS2 project and decisions made by Department for Transport and Network Rail and rail operators on how the HS2 Capacity is best used to intermediate stations.	The Council through the Local Plan process continue to discuss the rail capacity issues in Dacorum with the relevant agencies and organisations.
4. Chiltern & South Bucks District Council – are supportive but want to be kept informed on the findings of the traffic modelling on the transport network and the potential mitigation which could be secured in terms of highways infrastructure especially in relation to links through Chesham to Berkhamsted and Bovingdon	Noted: This will be covered in the ongoing DtC discussions.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response
5. Public Health Service (HCC) support the Plans approach to transport but request development prioritises active and sustainable travel and connectivity, urban permeability. Local Plan policy should establish expectations from the start of new development is sustainably located with appropriate densities and that provision for walking cycling and bus services are part of the first phase.	Noted: The transport user hierarchy will be considered as part of the plan development and opportunities for modal shift away from car based journeys to deliver a high non-car modal share will be explored. The Local Plan will be informed by the IDP which will address transport needs and appropriate weight will be given to LTP\$ policies and associated HCC policy.
6. Respondents raise concerns of where development is located, and that it should be in places where it is accessible and reduces the need for car use.	Noted: The transport user hierarchy will be considered as part of the plan development and opportunities for modal shift away from car based journeys to deliver a high non-car modal share will be explored. The Local Plan will be informed by the IDP which will address transport needs and appropriate weight will be given to LTP\$ policies and associated HCC policy.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response
7. Respondents raise issues with the availability of transport infrastructure including the limited services and the provision of infrastructure around these sites such as parking	Noted: The transport user hierarchy will be considered as part of the plan development and opportunities for modal shift away from car based journeys to deliver a high non-car modal share will be explored. The Local Plan will be informed by the IDP which will address transport needs and appropriate weight will be given to LTP\$ policies and associated HCC policy.
8. Issues regarding road congestion and the potential impacts of new development on this. In particular this were of great concern in the Kings Langley and Apsley areas	The highway impacts of new development will be taken into account and modelled using the COMET model to identify high level impacts and issues with more detailed site or junction specific modelling being carried out as necessary. The transport user hierarchy will be considered as part of the plan development and opportunities for modal shift away from car based journeys to deliver a high non-car modal share will be explored.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response
9. Believe that parking standards need to be reviewed for new developments and that these should be increased	There is an ongoing review of Car Parking Standards taking place with a view to adopting revised requirements. It may be appropriate to further review these once the growth strategy has been set and sites identified. Any revised standards will be subject to consultation in accordance with the Council's SCI.
10. Berkhamsted is not able to promote active travel due to its topography	Noted: options to deliver non-car based transport/travel opportunities throughout the Borough will be addressed as part of the plan development.
11. Infrastructure needs should be based on up-to-date housing numbers and employment	The IDP will be based on supporting the proposed levels of housing, employment and other development.
12. Traffic modelling will not accurately predict traffic movements and cannot be used to assess this.	Traffic modelling will be carried out using the HCC COMET model which is a recognised and established tool that is regularly updated with up to date information on travel patterns and vehicle numbers.

Question Number 12	
Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response Actions to be taken
1. Chiltern Conservation Board stated the need to add coverage for air quality and the impact Nitrogen from vehicles causes to plant life and specifically the proximity of Chiltern Beechwoods area of special Conservation and AONB to Dacorum road network such that only limited growth should be considered until “cleaner vehicles” are used.	The Council acknowledges the comments from Chiltern Conservation Board, air quality and environmental issue will be considered as part of the Local Plan work.
2. Buckinghamshire County Council do not support and note that Tring Railway station is used by Buckinghamshire residents as well and that the car park is already at capacity and creates issues with local community with on-street parking. Any future development around Tring needs to benefit from sustainable transport links to the station in order to reduce the level of car use. Suggest the BCC, HCC, DBC, AVDC joint representation to franchise holders on development plans and improve accessibility to Tring Station including a Herts CC proposed cycle route from Pitstone to Tring Station	The Council acknowledges the comments from Buckinghamshire County Council in relation to its concerns regarding accessibility and parking at Tring Station considering the proposed growth in the Tring and surrounding areas cross boundary. We would seek to take these forward and discuss these with all the appropriate agencies. This will also be addressed through ongoing DtC meetings.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

**Officer response
Actions to be taken**

3. **Buckinghamshire County Council** are concerned in relation to growth in Tring and surrounding areas cross borders and the A41 North and Southbound corridor and concerns over the increase in traffic levels on the surrounding rural roads through the Herts & Bucks villages including freight from Hemel Hempstead through to Pitstone

The Council acknowledges the comments from Buckinghamshire County Council in relation to its concerns regarding the A41 corridor and considering the proposed growth in the Tring and surrounding areas cross boundary. We would seek to take these forward and discuss these with all the appropriate agencies.

This will also be addressed through ongoing DtC meetings.

4. **Buckinghamshire County Council** are supportive of Grand Union Canal Towpath renovation project and upgrades from Aylesbury to Tring – pedestrian and cycle –

The Council acknowledges the comments from Buckinghamshire County Council in relation to Grand Union Canal Towpath. We would seek to take these forward and discuss these with all the appropriate agencies.

This will also be addressed through ongoing DtC meetings.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response Actions to be taken
5. Aldbury Parish Council are concerned with increase traffic in the area from developments from neighbouring areas in AVDC - Aylesbury Garden Town 3000 homes – RAF Halton 1000 homes as well as smaller developments (Pitstone 200 – Aston Clinton 600 homes) – and the subsequent increase in commuter journeys to Milton Keynes, Watford, London Euston from Tring Station – car park issues - already at capacity	The Council acknowledges the comments from Aldbury Parish Council in relation to its concerns regarding the proposed growth in the surrounding area and cross boundary. We would seek to take these forward and discuss these with all the appropriate agencies. DtC meetings will play an important part in addressing these and other cross boundary impacts and issues.
6. Aldbury Parish Council are also concerned with the Oxford Cambridge expressway and the anticipated increase in development in Aylesbury Vale and Central Beds increased housing demand from people from London into the area and the resultant increase in traffic in the area AONB , Conservation area	The Council acknowledges the comments from Aldbury Parish Council, cross border co-operation with all the relevant agencies will continue as we work through the Local Plan. DtC meetings will play an important part in addressing these and other cross boundary impacts and issues.
7. Berkhamsted Town Council comment that section 5.5.1 states policy requires plans to direct growth to sustainable location which enable maximum use to be made of public transport, cycling and walking – but few of the proposed sites in Berkhamsted meet this criteria as topography of Berkhamsted and absence of public transport that residents use cars rather than walk or cycle.	The Council acknowledges the comments from Berkhamsted Town Council noting their concerns. The appropriateness of sites will be assessed through the Local Plan work and initially the Site Assessment Study

Question Number 12	
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NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response Actions to be taken
8. Markyate Parish Council do not support DBC approach as their location is such that effects of Luton Airport expansion , M1 junction 9 and its general locality to not being near to any towns – it is a commuter location. They are awaiting the Herts CC review of parking standards and Herts CC transport strategy	The Council acknowledges the comments from Markyate Parish Council, cross border co-operation with all the relevant agencies will continue as we work through the Local Plan. DtC meetings will play an important part in addressing these and other cross boundary impacts and issues.
9. Markyate Parish Council also request any further development be located near to railway station or suitable transport hub so as to not increase car travel.	The Council acknowledges the comments from Markyate Parish Council, growth and development needs along with proposed sites will be assessed as appropriate through the Local Plan.
10. Tring Town Council are supportive of the majority of DBC approach – but would like to see commitment to improving air quality and to mitigate climate change and also full review of parking standards and Herts CC to emphasise viable alternative to car transport	The Council acknowledges the comments from Tring Town Council, air quality and environmental issue will be considered as appropriate as part of the Local Plan work, as will a revision to the current Parking Standards. DtC meetings will play an important part in addressing these and other cross boundary impacts and issues.

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Key points raised in representations	Officer response Actions to be taken
11. Aylesbury Vale DC – Issue 5 – how will people get around – A41 / M25 including Aylesbury section should be considered in traffic modelling work as the plan progresses to take account of the committed growth and the potential from both authorities Local Plans. Does Herts CC Comet modelling – does it utilise neighbouring districts growth and Bucks CC use a different trafficking model	The Council acknowledges the comments from Aylesbury Vale DC, committed and proposed growth will be assessed as appropriate through the Local Plan along with supportive traffic modelling evidence. Both authorities within the Duty to Co-operate meetings will be able to share, compare and further assess the results.
12. Welwyn Hatfield Borough Council – wanted this section to recognise and reference to the A414 consortium (which DBC is part of along with WHBC & other authorities) which are undertaking a study to this strategic route – the cumulative impact of growth along this corridor needs to be addressed in DBC transport strategy and could have implications to Dacorum Local Plan and its Duty to Co-operate with other authorities	The Council acknowledges the comments from Welwyn Hatfield Borough Council, the impact of growth along the A414 corridor will be considered through the Local Plan work and Duty to Co-operate with the other relevant authorities and agencies.

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NO	
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Key points raised in representations	Officer response Actions to be taken
13. Historic England refer to proposed transport infrastructure schemes and route options should consider any impact on heritage assets and their settings alongside archaeological potential. Referring also to NPPF paragraph 132 that significance can be harmed or lost through development within the setting of a heritage asset. These matters will material to further drafting of transport policy	The Council acknowledges the comments from Historic England, the Heritage Assets will be assessed as appropriate through the Local Plan evidence work.
14. Central Bedfordshire Council consider future growth in decorum and neighbouring authorities must be fully assessed in relation to transport impacts within and outside the Borough and as such transport modelling must take account to growth proposals within emerging local plans of neighbouring authorities.	The Council acknowledges the comments from Central Bedfordshire Council, committed and proposed growth and the impacts to transport cross border will continue as we work through the Local Plan, and with the relevant authorities and agencies. DtC meetings will play an important part in addressing these and other cross boundary impacts and issues.
15. Northchurch Parish Council consider the proposed sites do not take into account accessibility, suitability to any other forms of transport other than car – the topography of Northchurch / Berkhamsted is not suitable to walking , cycling.	The Council acknowledges the comments from Northchurch Parish Council noting their concerns. The appropriateness of sites will be accessed through the Local Plan work

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NO	
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Key points raised in representations	Officer response Actions to be taken
16. Luton Airport states DBC should review future growth forecasts and air travel trends to understand the impacts to be able to inform any mitigation measures. Issue is to consider new settlements and transport connectivity to the airport to achieve sustainable growth and the impact on travellers and employees to the airport. Clarity is requested as to how the impact would be measured and assessed and welcomes the opportunity for the London Luton Airport Consultative Committee to work with DBC	The Council acknowledges the comments from Luton Airport Authority, the potential impacts of cross boundary development will be fully considered and possible traffic and transport impacts modelled in conjunction with HCC, including use of the COMET model.
17. Greater London Authority are aware of the Herts CC emerging Growth and Transport Plan for South West Herts which will inform this plan. It acknowledges the draft Plan identified capacity of the west coast mainline, and that relevant decisions regarding HS2 capacity are yet to be released. Transport for London will have particular interest to intermediate London stations.	The Council acknowledges the comments from Greater London Authority. Rail capacity and impacts on stations outside the Borough will be addressed through the IDP, discussions under DtC and potentially direct discussion with Network Rail and service providers.
18. Watford Borough Council believe that there needs to be better provision of cycling and walking infrastructure to local destinations to reduce local traffic.	Noted: the Local Plan will look to support non-car based transport options and deliver development with a high non-car based mode share.

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NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response Actions to be taken
19. Hertfordshire County Council- Transport and Highways seek to ensure that Dacorum will continue to work with other authorities regarding the cumulative impacts. Joint infrastructure plan as part of the East and North Hemel Hempstead development, consideration of the Requirements of Local plan document (August, 2016), and that these should be located around transport hubs and interchanges.	Noted: this will be addressed through DtC. The Local Plan will look to support non-car based transport options and deliver development with a high non-car based mode share.
20. Berkhamsted Residents Action Group and Berkhamsted Citizens Association believe that the proposed sites within Berkhamsted will not encourage active travel due to the topography of the town and the lack of public transport to these areas will make them car dependent and worsen traffic congestion in the town centre.	Noted: options to deliver non-car based transport/travel opportunities throughout the Borough will be addressed as part of the plan development.

Question Number 12

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NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response Actions to be taken
21. Grove Fields Residents Association do not believe that the key issues have been addressed and that there needs to be an assessment of infrastructure deficit within Berkhamsted and Tring and how this would be delivered before any sites are allocated. There are issues with road capacity within Tring town centre and the commuting roads and limited parking availability with the town and at Tring Station. GFRA are in disagreement with HCC in that little infrastructure provision is required.	The IDP will address the infrastructure (including transport) needs arising from any proposed site allocations.
22. Respondents raise concerns that traffic modelling cannot accurately predict traffic movements as it does not take into consideration all routes used, nor does it consider traffic impacts from other authorities.	Traffic modelling will be carried out using the HCC COMET model which is a recognised and established tool that is regularly updated with up to date information on travel patterns and vehicle numbers.
23. Numerous respondents believe that there is limited consideration of improving infrastructure specifically that to encourage walking/cycling and the adoption of public transport (such as the frequency and reliability of bus services) or electric vehicles.	The IDP will address the infrastructure (including transport) needs arising from any proposed site allocations. The transport user hierarchy will be given full weight in setting general and specific development parameters and full regard, and full weight, will be given to HCC policies which seek to promote non-car based means of transport and movement.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response Actions to be taken
24. A number of respondents raise concerns regarding road capacity. Areas that were of particular concern were Kings Langley, Apsley and roads leading to the M25, Bovingdon and other smaller settlements in the Borough as well as the concern of capacity on country lanes near promoted sites.	The IDP will address the infrastructure (including transport) needs arising from any proposed site allocations. The transport user hierarchy will be given full weight in setting general and specific development parameters and full regard, and full weight, will be given to HCC policies which seek to promote non-car based means of transport and movement.
25. Respondents raise concerns about the capacity and availability of trains in the Borough, given that a number of stations are not frequently stopped at. Similarly, they also raise issues about the provisions at these stations such as parking availability. This was of particular concern for Kings Langley, and Tring station.	Rail capacity and impacts on stations outside the Borough will be addressed through the IDP, discussions under DtC and potentially direct discussion with Network Rail and service providers.
26. Concerns that the parking standards need to be amended to reflect car use. Concern that these developments will worsen parking problems as seen in some existing developments. Fear that this will worsen congestion with cars parked on the road, and blocking pavements for pedestrians.	There is an ongoing review of Car Parking Standards taking place with a view to adopting revised requirements. It may be appropriate to further review these once the growth strategy has been set and sites identified. Any revised standards will be subject to consultation in accordance with the Council's SCI.

Question Number 13	
Question Text: Do you agree with the proposed approach to ensuring good quality design within Dacorum.	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
<p>1. Sport England are encouraged that the council is recognising the role good quality design plays on making better places for people. Sport England and Public Health England established Active Design guidance to encourage developments to be designed to promote active lifestyles through sport and physical activity. (http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/). They recommend the inclusion of designing to promote active lifestyles as a consideration in the list of considerations that the Council's design approach is guided by.</p>	<p>The Council acknowledge these comments made by Sport England, and agrees that maximising design quality goes beyond improving the visual appearance of an area.</p> <p>The Council will seek to ensure that design quality goes beyond architectural detail and extends to placemaking, place shaping, health and wellbeing, biodiversity and ease of movement.</p>
<p>2. Chilterns Conservation Board When planning any development in the Chilterns AONB, the Chilterns Buildings Design Guide should be the most important influence on design, more so than wider generic documents and advice.</p>	<p>Noted: the formulation of planning policies and any SPD will have full regard to the Chilterns Buildings Design Guide and consideration will be given to including its principles into relevant policies, site allocations and other documents.</p>
<p>3. Little Gaddesden Parish Council are very keen to encourage the commencement by DBC of the Conservation Area Character Appraisals for Little Gaddesden and Ringshall and is happy to provide support on history through various Village groups.</p>	<p>Noted: Conservation Area Character Appraisals are not part of the Local Plan process but can provide important support to policy formulation and implementation as well as site allocation and associated SPD or other documents.</p>

Question Number 13

Question Text: Do you agree with the proposed approach to ensuring good quality design within Dacorum.

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

4. **Berkhamsted TC** design must be in keeping with the character of the town or village. Ridge-top developments are particularly intrusive and exacerbate negative factors. Design needs to take into account the new CCB report already referred to.

Noted: the impact of development on the setting of the wider area and its visual prominence will form part of the Site Assessment Study and any further detailed assessment carried out on specific site allocation proposals.

5. **Central Bedfordshire Council** considers that the quality of new development is an essential component in ensuring the successful delivery of growth and communities.

Noted: this view is supported and will be reflected in the Local Plan design policies and detailed site allocations.

Question Number 13

Question Text: Do you agree with the proposed approach to ensuring good quality design within Dacorum.

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Markyate Parish Council** – AGAINST - On occasions plans submitted do not take on board the local topography, much of Markyate is built on hillsides so the slope of the plot is often an important consideration and we would urge the Borough to include a need for an adequate standard of plan to be submitted. There is an urgent need for more car parking space and control. Markyate Parish Council would urge that the Borough look at developments, which have taken place, and were, designed under the Core Strategy policies and learn the lessons.

Noted: this will be taken account in the formulation of policies and site specific requirements.

2. **Tring TC** – AGAINST - There is a danger with the proposed approach as stated that the opportunity to promote standards above the minimum necessary to comply with legislation will be missed. The principles of good design listed should be extended to include energy efficiency, ecologically friendliness, and minimising the environmental impact.

Noted: this will be taken account in the formulation of policies and site specific requirements.

Question Number 13

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NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

3. **Historic England** – AGAINST - Strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. They seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character. The mass, scale, siting, position and detailed design of development should be appropriate for its location. Any decision regarding higher densities should be informed by an analysis of the likely historic environment impacts for any given location.

Noted: this will be addressed in the development of specific policies, allocations and the whole plan. Good design will be fundamental to delivering the plan.

4. **St Albans Diocesan Board of Finance** – AGAINST - SADBDF support the principles of good design sought by Dacorum, and seek a high level of design in all developments they undertake. The Plan sets out a very high-level approach on design matters: clear guidance should be noted on the requirements for masterplans of key development sites, and to ensure that developers are aware of the requirements for each site at an early stage in site assessments and preparation.

Noted: The high level principles will be developed to specific policies and site allocations to build on the strategic principles stated in the I+O document.

Question Number 13

Question Text: Do you agree with the proposed approach to ensuring good quality design within Dacorum.

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

5. Public Health Service (HCC) – AGAINST - Physical health and mental wellbeing can be positively influenced by well-designed developments with consideration of the location, density and mix of land uses that offer services to the community (NPPF, para 70).

Noted: it is acknowledged that good design has a positive impact on Physical health and mental wellbeing and consideration will be given to how this can be made explicit in the policies and site allocations.

6. NHBE – AGAINST - the list of guidance in paragraph 5.6.4 does not include any transport related documents. There should be explicit reference to landscape design, and taking a landscape/Green Infrastructure approach to master planning. Landscape Character Assessments should also guide this approach.

Noted: these aspects are acknowledged as key aspects and elements of good, integrated, design and will be addressed in detailed policy drafting and site allocation.

7. Hemel Hempstead Constituency Labour – AGAINST - An unacceptable amount of the existing more modern publicly-built housing stock in Hemel Hempstead appears in poor condition and somewhat run down, with some seemingly built of cheaper materials. We must ensure that this building for the short term does not persist in the future. Also all new build must conform to latest standards and knowledge on fire and other safety risks. Although this is allowed under regulations, it is not a satisfactory outcome for residents or the drive for better housing.

Noted: the Local Plan cannot address historic issues and detailed construction is addressed through the Building Regulations. The Local Plan will seek to promote high quality design irrespective of the tenure or purpose of proposed development.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

YES

If no, please explain what we have missed and why it should be included.

Key points raised in representations

Officer response

1. **Berkhamsted Town Council** asks DBC to consider the Chilterns AONB report with regards to producing new policies.

The Council acknowledge this statement and recognises the significance of the new report on Cumulative Impacts of Development on the Chilterns AONB.

As the Chilterns Conservation Board is a statutory consultee, the Council will be referring to the Chilterns Conservation Board through the Local Plan process, in which comments raised by the board will be considered in future Local Plan policy.

2. **Historic England** require historic monuments across the borough to be explicitly mentioned in the policy title, alongside archaeological remains.

The Council acknowledge this and understand the importance of protecting historic monuments and archaeological remains across the Borough. The inclusion of historic monuments and archeologically remains in a policy title can be considered further when producing the Regulation 19 Local Plan Policy documentation.

Historic England as a statutory consultee will be referred to through the allocation process, when there is potential of historic assets being identified.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

YES

If no, please explain what we have missed and why it should be included.

Key points raised in representations

Officer response

3. **Berkhamsted Citizens and BRAG** both require much more detail regarding each policy prior to making further comments.

The Council recognises that Appendix A only provides a list of policy titles proposed for the new Local Plan.

The Council through the planning process, will consult with statutory consultees when producing a detailed policy document which will be released for public consultation in the Regulation 19 stage of the Local Plan period. The Council will also consider the revised National Planning Policy Framework guidance when producing policies for the new Local Plan.

4. **GFRA & The Little Cloth Rabbit** both agree with the policies being suitable for the new Local Plan providing they are applied correctly.

The Council acknowledges these concerns and will consider them further through the Regulation 19 stage of the new Local Plan.

5. **Canal and River Trust** are willing to work with DBC to form policies that consider all issues regarding growth along the Grand Union Canal. The policies must address multi-functionality and cross boundary nature of the Canal. Specific policies are listed hereⁱ.

The Council acknowledges the comments raised and the policies suggested.

The Council has a responsibility under Duty to Co-operate to consult with statutory consultees and all relevant stakeholders when producing planning policy for the new Local Plan. Therefore, Dacorum Borough Council will seek further input from key stakeholders in preparation for the Regulation 19 stage during the Local Plan.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

YES

If no, please explain what we have missed and why it should be included.

Key points raised in representations

Officer response

6. Policies should address future proofing Hemel Hempstead, with particular regard to providing sufficient digital infrastructure. Policies such as those above were suitable for the previous Local Plan however not the upcoming one, meaning the current policies are well founded however are out of date and lack vision.

The Council recognises the need to future proof the Borough, with due regard for new technologies that can have a significant impact on improving both urban and rural areas within the local area.

The Council will continue to work with statutory consultees and engage with key stakeholders under Duty to Operate obligations to help inform the new Local Plan policies.

7. All policies should consider the local character/heritage/community feel of the area. Concerns were raised over growth in certain areas, predominantly, Tring, Berkhamsted and Kings Langley, and what type of growth will be brought to the area. This must be carefully considered during policy making for the new Local Plan.

The Council recognises the importance of protecting local heritage and relevant character of the Borough’s villages and towns.

The Council recognises the concerns raised and will consider them through the next stage of Local Plan work, continuing to engage with local residents to see how the Council can consider character assessments of areas where new growth is proposed.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

1. **Tring Town Council** would like the following changes; Add starter homes policy to ‘Affordable Housing’. Add quality of homes and various tenure types to ‘Housing and Community Facilities’ policy. Ensure that reducing carbon emissions is included in policy making for new developments, to ensure sustainable development.

Officer response

The Council acknowledge the suggested changes to the Local Plan policies and recognises the need for changes on all policies mentioned.

The Council must follow the criteria for all policies given by National Government. The Ministry of Housing, Communities and Local Government (MHCLG) defines affordable housing in the recent National Planning Policy Framework (NPPF), released July 2018. The Council is under obligation to MHCLG to follow definition and calculation procedure as set by National Government. The Council will review its current policies and ensure it is up to date with the new NPPF guidance.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

2. **Chilterns Conservation Board** suggest changes to the following policies; ‘Water environment, lakes, reservoirs, ponds and canals’ should refer to rivers + sustainable levels of water abstraction. Rivers; Gade, Bulbourne & Ver are chalk streams (a rare habitat). Currently failing EU Water Framework Directive due majorly to low flows due to over abstraction. This must be assessed and addressed

The Council acknowledge this and appreciate the importance of the Chilterns Area of Outstanding Natural Beauty for the Borough.

Policy relating to valued landscapes and more specifically the Chilterns Area of Outstanding Natural Beauty will be reviewed as part of the Local Plan process and amended as necessary to ensure these areas are protected.

Currently the Council use policies within the 2004 Local Plan and the AONB management plan 2014-2019 for any development near these designations. These will continue to be used as they are updated to ensure the AONB is protected.

3. **Markyate Parish Council** suggests DBC consider the impacts of the Hicks Road development when creating new policies alongside Markyate Parish Plan.

The Council acknowledges the impacts relative to the development regarding the Hicks Road area.

The Council recognises the need to consider the Markyate Parish Plan when considering new policies, particularly policies that relate to the specific area of Markyate.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

4. **Thames Water** has concerns over sewage policy, suggested a new policy DBC should not to underestimate the delivery of new infrastructure; Sewage Treatment Works can take 3-5 years to install, major treatment works up to 10 years. Welcome developments that consider SUDs and water efficiency. Tring in Transition refers to this also.

The Council recognises the impact existing and proposed communities may have on the utility provision in the area, including water facilities.

The Council also recognises the length of time it takes to deliver significant utility provision to support existing communities and future growth. These time scales will be considered in future Local Plan policy making when considering the delivery of new growth sites.

The Council will endeavour to consult with all utility providers for the Borough and take their views forward in future Local Plan policy making.

5. Character of areas should be considered in policy making. The use of brick, slate, wooden sash windows and chimneys in the design of new homes, to in-keep with the character of the residential areas particularly in the villages of the borough.

The Council recognises the importance of protecting local heritage and relevant character of the Borough’s villages and towns.

The Council recognises the concerns raised and will consider them through the next stage of Local Plan work, continuing to engage with local residents to see how the Council can consider character assessments of areas where new growth is proposed.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

6. Majesticare ltd & **BRAG** both raise concerns over lack of content and more is needed in further consultation.

The Council recognises these comments and will endeavour to consider this when producing its Regulation 19 Local Plan Consultation documentation.

7. Policies on carbon emissions should be in place as per the NPPF guidance. S106/CIL contributions could help with implementing zero carbon schemes.

The Council recognises the importance of sustainable development in relation to the mitigation of climate change, particularly when bringing forward new growth for the Borough.

The Council will endeavour to consider the guidance within the National Planning Policy Framework further during the Regulation 19 Local Plan Consultation documentation.

The consideration of a new scheme to achieve zero carbon emissions across the Borough will be considered later in the planning stages for the Council. If the Council were to approve a scheme such as this one then S106 contributions can be considered as a funding stream subject to approval.

Question Number 14	
Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
<p>8. Affordable housing policy should explicitly mention self build, different types & tenures alongside starter homes. These homes should be of appropriate size, avoiding ‘rabbit hutches’. Elderly homes with wheelchair access also a necessity through a ‘Community Care’ policy. The use of sustainable materials/methods should also be considered in the policy. Affordable homes must be brought forward regardless of developer viability issues, consider making the policies less generic to avoid developers finding ‘loop holes’. Affordable work spaces for local businesses should also be considered in new employment space.</p>	<p>The Council acknowledge the suggested changes to the Local Plan policies and recognises the need for changes on all policies mentioned.</p> <p>The Council must follow the criteria for all policies given by National Government. The Ministry of Housing, Communities and Local Government (MHCLG) defines affordable housing in the recent National Planning Policy Framework (NPPF), released July 2018. The Council is under obligation to MHCLG to follow definition and calculation procedure as set by National Government. The Council will review its current policies and ensure it is up to date with the new NPPF guidance.</p>
<p>9. Need for new mooring basins for both residents & tourists apparent for proposed land south east of London Road. Opportunity to deliver this site as mixed use if brought forward.</p>	<p>The Council acknowledge the suggested changes to the Local Plan policies and recognises the need for sufficient mix of use residential sites in the Borough.</p> <p>The Council will undertake further, in depth site assessments in preparation for the Regulation 19 stage in the Local Plan. The Council will exercise Duty to Co-operate obligations with statutory consultees and relevant stakeholders and consider all site brought forward.</p>

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

10. Police should approve affordable and social homes design, with ‘secured by design’ in mind to reduce risk of burglary’s by 50-75% and therefore reducing the demand on the police.

The Council acknowledges the need for secure homes across the Borough. The Council recognises the need for all types of new homes, including affordable and social housing, to be secure as a minimum requirement.

The Council will continue to work with statutory consultees and engage with key stakeholders under Duty to Operate obligations to help inform the new Local Plan policies.

11. Evidence required to support the mix of use and tenure in housing policies.

The Council acknowledges this comment.

Further evidence to support local plan policies will be produced and published for consultation during the Regulation 19 stage of the new Local Plan.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

12. Brownfield sites should be optimised across the borough before building on green belt land.

The Council acknowledges the need to make sufficient use of brownfield land across the Borough when considering new growth proposals.

The Council has considered Green Belt land within its proposals to meet the entirety of housing need for the Borough. As part of this process, it is difficult for the Council to predict when windfall Brownfield sites would become available to accommodate new growth. These sites would be favoured for development, however there would still likely be a need to release Green Belt land, because it may be inappropriate in retaining settlement character, or lack the infrastructure to support development.

13. A transport plan has not been produced for Bovingdon.

The Council acknowledges this comment and will consider this further in the Regulation 19 planning stage for the new Local Plan.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

14. Particular concern over Transport policies being very out of date, and not future proofed or advanced enough to support future growth.

The Council recognises the need to produce policies which are shaped on the basis of current issues that the Borough faces. This includes transport and mobility across Dacorum.

The Council will continue to work with statutory consultees and engage with key stakeholders under Duty to Operate obligations to help inform the new Local Plan policies.

Further evidence base will be produced to help inform new Local Plan policies, and will be consulted on during the Regulation 19 stage of the new Local Plan.

15. Integration & improvements of public footpaths and byways should be considered in policies considering new developments.

The Council acknowledge this statement and understands the importance of improving sustainable travel methods and integrating new communities with existing communities through public footpaths and byways.

The Council will consider the inclusion of improving public footpaths and byways in the Local Plan planning process moving forward. The Council will continue to consult with statutory consultees and developers to ensure that the concerns raised within representations, to better inform any development moving forward.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

16. Residents should be consulted on what local amenities are needed in the area to truly understand what is required to be introduced/improved in the light of new development. Recommended that the NHS should be involved when considering impacts on existing health services and the introduction of new services.

The Council acknowledges these comments and understands the importance of consulting local residents upon the issues Dacorum face and may face in the future. The Council believes community engagement is invaluable and absolutely necessary, and welcomes engagement and consultation throughout the planning stages in the new Local Plan and beyond.

The Council recognises the impact new growth can have on existing healthcare infrastructure. Under Duty to Co-operate obligations, the Council continues to work with all Statutory consultees and key stakeholders, including the Clinical Commissioning Group, who help inform the new Local Plan policies moving forward.

17. Air and light pollution should be considered in new policy making.

The Council acknowledges this comment. Listed within Appendix A of the Issues and Options consultation document is a policy titled as ‘Environmental Protection’ under heading ‘Looking after the environment’. This policy includes the consideration of lighting, noise and air quality.

The Council will make use of the National Planning Policy Framework guidance to further develop this policy for the Borough.

Question Number 14	
Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
18. Parking policies not considered. Electrical charging points should be considered in policies regarding sustainable transport and parking policies.	<p>The Council acknowledges this comment. Listed within Appendix A of the Issues and Options consultation document is a policy titled as ‘Parking’ under heading ‘Sustainable Development’. This policy includes the consideration of both on-street and public parking.</p> <p>The Council will make use of the National Planning Policy Framework guidance to further develop this policy for the Borough.</p> <p>The Council recognises the importance of providing sustainable transport means for the Borough, alongside providing sufficient access to Electrical Charging points for hybrid and electric vehicles. While a policy does not explicitly exist in Appendix A of the Issues and Options document, The Council do have a policy titled ‘Sustainable Transport’ under the heading ‘Sustainable Development’. The Council will make considerations to further advance this policy to consider advancements in transport technology, and ensure that all policies are robust enough and have the scope to accommodate further change in transport technologies in the future. This adheres to the guidance available to the Council within the National Planning Policy Framework.</p>

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

19. Waste Policies not considered.

The Council recognises that there is not a singular policy relating to waste in its entirety for the new Local Plan.

The Council is under obligation to follow the County Council Waste policies as indicated in Hertfordshire County Council’s Waste Local Plan. This is the reasoning behind there being no singular waste policy identified for consideration in the Local Plan for Dacorum.

20. Shared equity policy to be removed, ensuring that affordable homes are based upon local affordability rather than market value.

The Council acknowledge this and understand that affordable homes must be ‘genuinely’ affordable for the Borough. The Council acknowledges the relative impacts of providing the Borough with a policy relating to Shared Equity.

The Council must follow the definition and thus calculation of affordable housing need as set by National Government. The Ministry of Housing, Communities and Local Government (MHCLG) defines affordable housing in the recent National Planning Policy Document (NPPF), released July 2018. This definition bases affordable housing off of local housing market rates. The Council is under obligation to MHCLG to follow definition and calculation procedure as set by National Government.

<p>21. DBC to ensure policies support Herts LTP and SWHG&T Plan objectives. Natural, Historic & Built environment advisory team recommends policies including on conservation and historic environment inclusive of historic landscapes. Mineral safeguarding should also be considered in new policies.</p>	<p>The Council acknowledges the points raised.</p> <p>The Council regularly engages with Hertfordshire County Council concerning, in particular, the South West Hertfordshire Growth and Transport Plan. The Council advises the County Council on the proposed growth for the Borough and current Transport related issues for the area.</p> <p>With regards to environmental and historical impacts as a consequence of new growth in the Borough, the Council notes raised issues by local environmental and historic groups as well as Country wide organisations such as Natural England and Historic England. This engagement helps to inform the Council's planning process moving forward.</p> <p>The Council notes that a mineral safeguarding policy is not considered as a singular policy in the Local Plan. While this is the case, the Council does take into account County Council guidance on minerals. This is because the responsibility of mineral safeguarding lies with the County Council. Please note that the County Council is currently publishing the Proposed Submission Minerals Local Plan until 22nd March 2019. Adoption of the Minerals Local Plan by the County Council is scheduled to take place in Summer 2020.</p>
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Question Number 15

Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?

YES

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations	Officer response
1. Agree, but take into account links with areas beyond South West Herts, as follows: <ul style="list-style-type: none">• London and the London Arc (Berkhamsted TC and Markyate and Northchurch PCs and others)• Links between Tring and Aylesbury Vale (Tring TC and Markyate PC)• Links between Markyate and Central Bedfordshire/Luton (Markyate PC)• Links between Bovingdon and Chiltern District (Markyate PC)• Proposed new housing nearby in Bedfordshire and Buckinghamshire (Berkhamsted TC)	Paragraph 6.1.7 in the consultation document recognises that South West Hertfordshire’s housing market area is influenced by close connections to nearby areas.
2. Hertsmere Borough Council: Agree.	Noted
3. Agree that St Albans should be included (Berkhamsted Town Council and others).	Noted

Question Number 15	
Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?	
YES	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
4. Agree, but a more regionalised approach involving Housing Market Areas (HMAs) for Oxfordshire, Buckinghamshire and Bedfordshire would minimise impacts on the wider Green Belt and AONB.	See response to point 1 above. Also, the definition of housing market areas is based on Government guidance (paragraph 010 in the Planning Practice Guidance on ‘Plan-making’) – see also paragraph 6.1.4 of the consultation document. The impact on the wider Green Belt and AONB are not relevant in defining such areas.

Question Number 15	
Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Housing markets do not follow council boundaries. In particular, Tring and Berkhamsted have a much closer relationship with Aylesbury Vale than with most of South West Hertfordshire (Tring Town Council and others).	Appendix 1 in the South West Hertfordshire Strategic Housing Market Assessment (SHMA) stated that: "Housing Market Areas should be based on the 'best fit' to local authority boundaries; albeit that SHMAs can (and should) recognise cross-boundary influences and interactions." This approach is supported by the Planning Advisory Service Technical Advice note on 'Objectively Assessed Need and Housing Targets'.
2. It would be better to plan over a wider area, for example including parts of Buckinghamshire and Bedfordshire, where there is more potential for growth (Chilterns Conservation Board and others).	The definition of housing market areas is based on Government guidance (paragraph 010 in the Planning Practice Guidance on 'Plan-making') – see also paragraph 6.1.4 of the consultation document. The analysis in Appendix 1 of the SHMA provides clear evidence for defining South West Herts as an HMA, because the area has similar characteristics in terms of migration and commuting patterns, and house prices. The potential for growth is not a relevant factor when defining HMAs.

Question Number 15

Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

3. There are strong relationships between part of the South West Herts HMA and Welwyn Hatfield. Certain areas also fall within the Welwyn Hatfield HMA. The Welwyn Hatfield Local Plan Inspector has indicated that the Welwyn Hatfield HMA is the appropriate area for considering whether the full local housing need is being met.

Whilst there may be a strong relationship between part of the South West Hertfordshire and Welwyn Hatfield, the relationship between Dacorum and Welwyn Hatfield is not very strong. Indeed, although the Welwyn Hatfield HMA extends into South West Hertfordshire, it does not cover any part of Dacorum.

Dialogue between Welwyn Hatfield and the South West Herts authorities (including Dacorum) on local housing need and housing land supply should continue. Dacorum should consider if it can meet some of Welwyn Hatfield's housing shortfall in its Local Plan (within the context of the SW Herts HMA). (Welwyn Hatfield Borough Council)

Therefore, and given the Green Belt, AONB and other constraints in Dacorum, it is concluded that Dacorum is not an appropriate location to accommodate any of Welwyn Hatfield's unmet housing need.

4. Dacorum should fully consider meeting its full local housing need within its boundaries, taking account of the Government's finalised standardised methodology for calculating need. (Central Bedfordshire Council)

The Council will take the Government's methodology into account, but this is point relates to Questions 16 and 33-35, rather than Question 15.

Question Number 15	
Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. What consideration has been given to the potential for any unmet need arising from the Borough and if this were to arise, where would it be met? (Central Bedfordshire Council)	This point relates to Questions 16 and 33-35, rather than Question 15. The Council's approach will be consistent with the NPPF (particularly paragraphs 35 and 137) and the PPGs. We have not yet decided whether Dacorum can reasonably accommodate all its local housing need and, if not, where any unmet need should be met. If it is concluded that some of the need cannot reasonably be met, we will hold duty to co-operate discussions with neighbouring authorities. The Council's representations on the pre-submission St Albans Local Plan state that a substantial amount of the proposed housing at East and North Hemel Hempstead in St Albans District should count towards meeting Dacorum's local housing need.
6. It is essential that St Albans are involved when considering how the HMA will meet its housing needs. If St Albans continue to prepare a separate evidence base, it will be important to ensure that their evidence aligns with the South West Herts SHMA. If not, there is the very real concern of the authorities across the HMA failing in their duty to co-operate.	This problem has already been addressed, as St Albans has joined with the other South West Hertfordshire authorities in commissioning a replacement of the South West Hertfordshire SHMA. The new study (called the South West Herts Local Housing Need Assessment) will review the HMA boundaries and assess local housing need across the whole area.

Question Number 15

Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

11. Green Belt land and the Chilterns Area of Outstanding Natural Beauty should be excluded from the HMA (Chilterns Conservation Board and others).

Officer response

These are not factors to be taken into account when defining HMAs. However, they will be relevant when the Council considers whether it can reasonably accommodate its local housing need.

The definition of HMAs is based on Government guidance (paragraph 010 in the Planning Practice Guidance on 'Plan-making') – see also paragraph 6.1.4 of the consultation document.

Setting this aside, the Council will follow Government guidance in the NPPF when reaching conclusions on any proposals affecting the Green Belt and AONB in the new Local Plan.

Question Number 15	
Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
12. Object, because it allows other South West Herts councils to meet some of their housing need in Dacorum. This will mean loss of Green Belt land, increased pressure on local services and the need for infrastructure improvements.	<p>These are not factors to be taken into account when defining HMAs. The definition of HMAs is based on Government guidance (paragraph 010 in the Planning Practice Guidance on 'Plan-making') – see also paragraph 6.1.4 of the consultation document.</p> <p>Setting this aside, the point made by the objectors is incorrect. The NPPF and PPGs require each Council to accommodate its own local housing need, unless it can demonstrate that it cannot reasonably do so. We are not obliged to accede to requests from other South West Herts authority to accommodate some of their unmet housing need. The Council will give careful consideration to any such requests, before deciding whether to agree to them. In reaching a decision, the Council will take account of the Green Belt, AONB and other constraints in Dacorum.</p>

Question Number 15

Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

13. St Albans should not be allowed to build houses at East Hemel Hempstead, which will require its infrastructure to be provided in Dacorum. Nevertheless, any housing built there should count towards Dacorum’s local housing need.

Officer response

These are not factors to be taken into account when defining HMAs. The definition of HMAs is based on Government guidance (paragraph 010 in the Planning Practice Guidance on ‘Plan-making’) – see also paragraph 6.1.4 of the consultation document.

Setting this aside, these are matters to be decided through the St Albans Local Plan, not the Dacorum Plan. Dacorum’s representations on the pre-submission St Albans Local Plan state that a substantial amount of the proposed housing at East and North Hemel Hempstead in St Albans District should count towards meeting Dacorum’s local housing need.

Question Number 15

Question Text: Do you agree with the definition of the Housing Market Area, as shown in the South West Hertfordshire Strategic Housing Market assessment?

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations	Officer response
14. Shendish is in Kings Langley Parish and is part of the Rucklers Lane community). It should not be treated as being within Hemel Hempstead.	This is not a factor to be taken into account when defining HMAs. The definition of HMAs is based on Government guidance (paragraph 010 in the Planning Practice Guidance on 'Plan-making') – see also paragraph 6.1.4 of the consultation document. Setting this aside, the objection relates to site HH-h3 in the draft Schedule of Site Appraisals document. This site is in Kings Langley parish, but if it is taken out of the Green Belt it will form a physical extension to the town of Hemel Hempstead, not the village of Kings Langley.
15. Priority should be given to housing in existing urban areas and on brownfield (previously developed).	These are not factors to be taken into account when defining HMAs. The definition of HMAs is based on Government guidance (paragraph 010 in the Planning Practice Guidance on 'Plan-making') – see also paragraph 6.1.4 of the consultation document. Setting this aside, in line with the NPPF (paragraph 137), the Council will make as much use as possible of suitable brownfield sites and underutilised land, and optimise the density of development.

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? A) The Government's draft figure of 602 homes a year	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
<p>1. Chilterns Conservation Board believe that the housing figures should be reduced if its impact will have significant impacts on the Area of Outstanding Natural Beauty. The plans do not consider the many issues of land designations within the Borough. Housing numbers should reflect these and be considered appropriately, and currently there is no evidence to support this. In agreement with the Sustainability Appraisal in that higher growth levels would have adverse effects on the environment.</p>	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>The Site Assessment Study will look provide an overview of all sites including any designations or potential impacts on the setting of the AONB. The SA/SEA will also address this issue.</p>
<p>2. Berkhamsted Town Council believe that this figure should be the upper limit of housing numbers as there needs to be a realistic assessment of the capacity and suitability of the sites to provide infrastructure and the land constraints. There also needs to be consideration of St Albans development on East Hemel and how these will contribute to Dacorum's housing numbers. They also argue that it is not necessary to go to the higher housing numbers as the consultation document gives planning authorities a 2-year grace period before this takes effect.</p>	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>The cumulative impacts of development inside the Borough boundary and beyond the boundary will be taken into account in developing the plan.</p>

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? A) The Government's draft figure of 602 homes a year	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
3. Northchurch Parish Council are concerned about the numbers that are achievable within the Borough. They feel that the lack of infrastructure available within Northchurch and Berkhamsted area and that Berkhamsted has taken twice its targeted growth, which has affected Northchurch.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure. Infrastructure requirements will be identified through the IDP.
4. Chilterns Society believe that based on the recent 'Planning the right homes in the right places' document release that the Council should be arguing for lower figures due to the many land constraints of the Borough and that more housing need does not warrant exceptional circumstances for Green Belt release. They also raise concerns about the possible housing demand increase once the Core Strategy is 5 years old and the implications that this would have on infrastructure capacity/availability.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? A) The Government's draft figure of 602 homes a year	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. Grove Fields Residents Association also feel that there has been no consideration of the land constraints in the Borough and the concern of having to take additional housing numbers from other authorities. The Strategic Housing Market Assessment does not give weight to the issues of the Borough and only after these issues have been considered should a housing figure be produced. There will likely need to be the application of the Sedgefield test due to the under delivery of housing supply in previous plan periods.	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>The SHMA seeks to quantify the housing need within the Borough rather than assessing the ability of the Borough to accommodate a particular level of development having regard to planning constraints.</p>
6. A number of respondents raise concerns about the political uncertainties and how this would affect housing numbers going forward	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>Political uncertainty is not a material planning consideration although it may be that this can influence Government Policy on housing delivery.</p>

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? A) The Government's draft figure of 602 homes a year	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
7. Many respondents were in agreement with this figure as it will meeting the proposed housing need without having significant impact on the Green Belt, however there is still concern raised about other environmental impacts such as increased pollution levels and loss of biodiversity and wildlife.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.
8. Numerous respondents raise concerns about Infrastructure capacity within the Borough particularly road and rail links as these are already at capacity as well as other physical, social and green infrastructure needs	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure. Infrastructure requirements will be identified through the IDP.

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? A) The Government's draft figure of 602 homes a year	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
<p>9. Respondents do not agree with meeting the need of neighbouring authorities, due to the issues of Dacorum meeting its own housing need. They believe that they should only meet local needs and not be forced to take additional housing demand from London. Similarly, they believe that there should be more consideration regarding the East Hemel development and how this will contribute to Dacorum's housing numbers.</p>	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>Any requests to take the housing need from other LPA areas would need to be supported by compelling evidence that they could not meet their own need and/or had exhausted opportunities to secure assistance from immediately neighbouring areas.</p>
<p>10. Many respondents believe that high levels of development will have a significant impact on the character of settlements. They also believe that data should more accurately reflect the individual settlements as highlighted in the settlement hierarchy, particularly the housing need for each settlement and the levels of development already produced so that housing numbers are distributed more fairly.</p>	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>The detailed issues raised will be addressed as the plan is developed and a finer grain of detail is applied to site selection and assessment.</p>

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? B) The figure of 756 homes a year	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Chilterns and South Bucks District Council- Support the approach to use the SHMA and Objectively Assessed Housing needs as this provides the most up-to-date evidenced figures.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.
2. Markyate Parish Council and other respondents support and understand the need for new homes in Dacorum and that this is a reasonable figure, however they believe that the Government approach 'right homes in the right places' is flawed as it does not consider that many people within the Borough commute into London. They also raise concerns about water availability in the South East region and how these issues will be addressed.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure. It is not the place of the Local Plan process to challenge or seek to redefine Government Policy. Availability of water to support new development is addressed through other legislation (the right to connect); however, this matter will also be addressed through the IDP and DtC process to ensure that capacity is available at the right time to support new development.

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? B) The figure of 756 homes a year	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
3. Many developers/ planning consultants believe that this figure is an appropriate starting point based on evidence needs, however there is also an understanding that changes to Governments housing calculation may mean that higher figures will be sought and so the plan and housing land supply should have enough flexibility to meet this higher number.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.
4. Some respondents feel that allocating housing numbers of this level is unnecessary at the moment as this figure may reduce due to political uncertainties	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.
5. Respondents believe that there needs to be greater consideration of the type of housing that is produced to ensure that it meets the needs of local people.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure. The mix and tenure of the proposed housing will be addressed through the LHNA.

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? B) The figure of 756 homes a year

Please explain your answer with reference to any evidence.

Key points raised in representations

- 6. Believe that building in Dacorum will worsen infrastructure issues and will not be able to accommodate the growth proposed.

Officer response

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

The IDP will identify the infrastructure needed to support new development.

Question Number 16		
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? C) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula		
<i>Please explain your answer with reference to any evidence.</i>		
Key points raised in representations	Officer response	Actions to be taken
1. Many of the respondents feel that this is the correct growth figure to go for as it complies with Governments standardised methodology approach and feel that this more accurately meets housing need of the Borough.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.	
2. Believe this is most appropriate to ensure that the Plan can be found sound, as the Core Strategy is over 5 years old and will mean that the government methodology will take effect.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.	

Question Number 16		
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? C) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula		
<i>Please explain your answer with reference to any evidence.</i>		
Key points raised in representations	Officer response	Actions to be taken
3. There needs to be consideration of the amount of development each settlement can take based on these housing numbers	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure. This will be addressed through the Site Assessment Study and detailed analysis and assessment of sites proposed for allocation.	
4. These levels need to be provided to ensure that property prices can decline or provide enough affordable housing for the community	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.	

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? C) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula

Please explain your answer with reference to any evidence.

Key points raised in representations

- 5. There needs to be duty to cooperate with other authorities in determining how housing number are met for example between Hemel Hempstead and St Albans.

Officer response

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

Actions to be taken

The DtC process has commenced and is ongoing.

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
<p>1. Hertfordshire County Council- Development services, property, resources- believe that land release should be based on the Sustainability note and choosing sustainable locations. There needs to be emphasis on selecting sites that can meet infrastructure needs with little or no change, and the potential to share infrastructure between settlements such as a new secondary school for Berkhamsted and Tring. They feel that site Tr-h5 Dunsley Farm would be appropriate for providing this from a highways perspective. They also request that they are consulted on the contributions, which could be made towards this site.</p>	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>Infrastructure needs will be addressed through the IDP. The Site Assessment Study will look at the suitability of individual sites and explore opportunities for creating larger sites and/or clustering collocated sites in whole or in part.</p>
<p>2. Hertsmeire Borough Council- Want a statement of common ground on the approaches and choice of housing targets because of close links within the Housing Market Area</p>	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>It is intended to develop a SoCG through the ongoing DtC process.</p>

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)

Please explain your answer with reference to any evidence.

Key points raised in representations

Officer response

3. Tring Town Council- believe that the figure of 756 does not take into account the land constraints that exist within the Borough and that a figure should be produced which reflects this whilst also aiming for Government figures, this could be done by working out the urban capacity of each settlement and closer community engagement.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

The Urban Capacity Study will identify potential for accommodating development within existing settlements.

4. Welwyn Hatfield Council- request further consultation with neighbouring authorities in the South West Herts area and whether they would be able to meet any of their housing numbers. They also believe that housing numbers will be produced by the NPPF and standard methodology, however if SHMA figures are used these should be updated to reflect household and population projections.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

Sharing of housing numbers can be addressed through the DtC process.

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)

Please explain your answer with reference to any evidence.

Key points raised in representations

Officer response

5. St Albans City and District Council- Do not believe that Dacorum's initial analysis of housing numbers is not robust and that a higher level of 1056 homes would be needed if the plan was not submitted before 2018.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

6. Watford Borough Council- Wish to consult with neighbouring authorities once their housing and employment land availability assessment has been completed and whether neighbouring authorities could meet this need.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

Further discussion on numbers and support will be facilitated through the DtC process.

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)

Please explain your answer with reference to any evidence.

Key points raised in representations

7. Berkhamsted Residents Action Group do not believe that it is reasonable to set a housing figure above 476 as this is the figure determined to be the urban capacity of the borough, however they believe that this under estimates what can actually be achieved as it is already 11% higher than this without Green Belt release and that there should be consideration of taller building to increase capacity further. They also state that these figures should not determine housing need as there are many constraints within the Borough and was confirmed in the planning for the right homes in the right places consultation. Growth needs to be realistic, the SHMA is flawed on the basis of people per household. There also needs to be consideration of St Albans extension to Hemel Hempstead and that the standard methodology allows a 2 year grace period before plans have to meet these higher targets all of which would affect housing targets.

Officer response

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

This will be addressed through the Site Assessment Study and detailed analysis and assessment of sites proposed for allocation.

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)

Please explain your answer with reference to any evidence.

Key points raised in representations

Officer response

8. Grove Field Residents Association feel that there has been no consideration of the land constraints within the Borough or the possible need to take numbers from other authorities. A figure of 602 should be used until a higher value can be proven necessary. The SHMA does not give sufficient weight to the issues raised and only after this should a starting point be determined.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

This will be addressed through the Site Assessment Study and detailed analysis and assessment of sites proposed for allocation.

9. A number of developers believe that the higher value should be sought, as this will be required by the Government standard methodology when the plan is adopted.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)

Please explain your answer with reference to any evidence.

Key points raised in representations

Officer response

10. A number of respondents are in favour of figures lower than those proposed in the consultation because of the need to protect Green Belt land and other land designations as well as wildlife; they also believe that this has been reflected in the planning for the right homes in the right places consultation.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

This will be addressed through the Site Assessment Study and detailed analysis and assessment of sites proposed for allocation.

The SA/SEA will assess the over sustainability of the Local Plan

11. Respondents feel that lower values should be sought due to infrastructure issues including transport links and other physical and social infrastructure capacity issues.

Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

The IDP will address the infrastructure requirements necessary to support development.

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
12. Believe that lower figures will help to protect settlement character and that large scale developments would be inappropriate.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure. The SA/SEA will assess the over sustainability of the Local Plan
13. Housing figures should be based on local needs rather than Government set values, would be more appropriate to do this on a local level and should not have to take further growth levels from London.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

Question Number 16	
Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)	
<i>Please explain your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
14. Should consider neighbouring authorities and how this will contribute or effect Dacorum's housing numbers particularly the St Albans site at Hemel Hempstead	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure. The needs and impacts of development in other Boroughs will be addressed under DtC.
15. There needs to be greater consideration of political changes and how this will effect housing numbers going forward and whether these higher values would be appropriate.	Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.

Question Number 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Little Gaddesden Parish Council and Berkhamsted Town Council** both share the view that affordable housing cannot then be bought and sold on at market value. It is recognised that this regularly occurs with property developers.

The Council acknowledges this comment and understands the importance of ensuring sufficient supply of affordable housing is made available through new growth schemes.

The Council cannot oversee upon which properties are bought after any development is completed unless the Council act as the housing developer for a particular site. As such, the Council has proposed increasing the percentage level of affordable housing for all new growth sites, to ensure a large amount of affordable housing is still provided through new developments. The Council recognises that whilst this does not solve the issue stated, it does allow a higher provision of affordable housing in the Borough than previously delivered.

2. **Tring Town Council** would like to see socially rented affordable homes, starter homes and shared ownership schemes be embedded in the affordable housing policy for the new Local Plan.

The Council acknowledges the comments raised and understands the importance of bring forward shared ownership, starter homes and socially rented schemes to the Borough.

The Council follows the National Planning Policy Framework guidance when forming policies for the new Local Plan. The Council will continue to use this guidance to inform future policy making for the new Local Plan, including more recent guidance released July 2018.

Question Number 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

3. **Northchurch Parish Council** suggest the Maylands Avenue affordable homes are to be used as an exemplar development to be followed in the future. The Parish Council share concerns over affordable homes being compromised of their size.

Officer response

The Council acknowledges the comments raised and are pleased that Kylna Court and other housing developments are of approval of some statutory consultees.

The Council acknowledges the comments raised on affordable housing sizes and understands that a fair mix of types and tenures should also apply to affordable housing allocation.

The Council will continue to follow National Planning Policy Framework guidance to inform future policies within the new Local Plan. Guidance on types and tenures of housing may also assist in determining sizing of affordable housing for upcoming site allocations.

Question Number 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

4. **Markyate Parish Council** suggests all affordable housing built in rural areas should be allocated to local residents only. Market value housing should be strategically located to suit commuters, while affordable housing should be located nearby local transport links.

The Council acknowledges the comments raised and understands the importance of ensuring existing residents have the opportunity to abide in new affordable housing.

The Council frequently engage with relevant developers to assist in the master planning of major site allocations alongside statutory consultees and key stakeholders. This helps us inform the strategic location of all new housing for the Borough across the development sites.

The Council are unfortunately not able to have influence over which person(s) are able to purchase an affordable housing property. However, the Council will continue to engage with residents of the Borough to inform and update local people on the delivery of new housing in the Borough.

5. **St Alban’s Board of Finance** suggests to maintain flexibility for affordable housing allocation at 35 – 40%. Affordable housing allocations should be located in the most appropriate locations.

The Council acknowledges these comments and will consider these points further when determining affordable housing allocation percentage for the new Local Plan.

The Council will continue to frequently engage with developers to assist the master planning of major site allocations, consulting with statutory consultees and key stakeholders to strategically locate affordable housing across the Borough.

Question Number 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

6. An emphasis on Starter Homes should be embedded in new Local Plan Affordable Housing policy. 1-2 bedroom properties should also be available as housing and not just flats, providing a garden which is particularly attractive for young families.

The Council acknowledges these comments and understands the needs to provide affordable housing for all types of residents across the Borough.

The Council will continue to carry out site assessments and needs assessments to determine the particular housing need for residents in the Borough.

7. Affordable Housing should be made available in rural settlements, specifically Berkhamsted and Tring, as well as urban settlements such as Hemel Hempstead.

The Council acknowledges these comments and understands the importance of providing affordable housing in all areas across the Borough.

The Council, as per National Planning Policy Framework guidance, is advised to ensure developers of all major sites, consisting of 10 houses or more, must provide an affordable housing percentage determined in Local Plan policy. This ensures affordable housing is delivered across the Borough on all major sites allocations.

Question Number 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

- 8. DBC should act as a developer more, ensuring affordable housing of mixed type and tenure is delivered for the Borough.

Officer response

The Council acknowledges these comments and recognises the importance of providing social and affordable housing for the Borough.

The Council has an active role in constructing and responding to the demand for social housing across the Borough, and has been a very active developer to bring social housing forward. For example, The Council expects a total of 203 social housing properties to be delivered during 2019 alone.

The Council values the importance of relationships with the Borough’s landowners and local developers, and recognises the need to allow developers to deliver some of the housing need for the Borough. The Council faces a substantial amount of growth and is expected to deliver this growth under obligation of the national government. Although the Council does indeed deliver a percentage of the housing need for the Borough, the Council is simply unable to deliver substantial amounts of growth due to financial and resource constraints faced widely by local governments across the country.

The Council will continue to engage with land owners across the Borough and developers to ensure that affordable housing at the appropriate level is delivered across the Borough. The Council will also ensure that all affordable housing delivers a variety of types and tenures to provide for all types of residents across the Borough.

Question Number - 17	
Question Text: “Do you agree with the proposed approach to affordable housing?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Chilterns Conservation Board asks DBC to consider aligning DBC affordable housing policy with South Oxfordshire District Council’s affordable housing policy of 40% affordable housing on 11 sites or more. This policy is subject to viability of affordable housing provision on each site.	The affordable housing policy will be based on the evidence from the LHNA which has been carried out for the South West Hertfordshire HMA. It may be that the evidence suggests a similar level of provision but it may be that the evidence points to a different level being appropriate to DBC. Any affordable housing levels and mix will be set having full regard to the viability evidence prepared to support the plan.
2. Central Bedfordshire Council recommend DBC produce a SHMA that provides for a range of housing types and tenure.	This is addressed through the LHNA which fulfils the role of a SHMA.
3. Public Health Service within Hertfordshire County Council states that the quality and affordability of housing can determine the health status of residents.	Noted; this will be addressed through the plans approach to health and wellbeing.
4. BRAG recommend DBC to not allow developers flexibility in the percentage of affordable housing that can be delivered. DBC must ensure that viability arguments do not undermine the affordable housing policy and thus how many affordable dwellings are delivered. Affordable housing must also be easily accessible to all public services.	The levels of affordable housing will be set through the Local Plan and any supporting SPD. Departures will only be considered where this is supported by compelling evidence in line with the NPPF and supporting PPG.

Question Number - 17	
Question Text: “Do you agree with the proposed approach to affordable housing?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. GFRA support 35% affordable housing. Affordable housing subject to review of density and height standards. More flexibility for developers on provision of policy if they are delivering a large housing site on brownfield land.	Noted: policy will be developed having regard to the NPPF, PPG, LHNA and viability assessment.
6. Dacorum Patients Group wish to see homelessness rates and manual worker wages form part of the affordable housing assessment need for the Borough.	These factors will be assessed in the LHNA which will inform the Local Plan Policy development
7. Clear definitions of affordable housing need to be presented in the new Local Plan. This should include those earning under the national average wage of £27,000 given priority to purchase/rent affordable properties.	This will be derived from the LHNA evidence and followed through in the Local Plan policy(ies) and any supporting SPD.
8. Set percentage needs to be agreed and further evidence needs to be collected to support determined figures and predominantly the need for affordable housing in the Borough.	This will be derived from the LHNA evidence and followed through in the Local Plan policy(ies) and any supporting SPD.
9. Affordable housing in DBC low and can cause issues when recruiting staff locally.	Noted: the Local Plan will look to deliver affordable housing at appropriate cost.
10. Highest growth level figures for the Borough would allow developers to be able to deliver up to 33.3% of affordable housing, the closest figure to the current 35%.	The required level of affordable housing will be derived from the LHNA evidence and followed through in the Local Plan policy(ies) and any supporting SPD.

Question Number - 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

11. Viability concerns per site could mean affordable housing could not be delivered. Developers should aim for 35%, but the policy should not apply if viability assessments consider the site unviable. Further research is needed into the types and tenure of housing need in borough as this impacts site viability further.

The NPPF and supporting PPG sets clear guidance on how viability should be addressed in assessing levels of affordable housing and other infrastructure to be provided. The guidance makes it clear that developers should carry out valuations based on schemes that comply with Local Plan policy.

12. An increase to 40% affordable housing provision should be made compulsory for any development on greenbelt land. A penalty fee should be introduced if the affordable housing provisions is not met.

The required level of affordable housing will be derived from the LHNA evidence and followed through in the Local Plan policy(ies) and any supporting SPD. Planning legislation does not allow for the setting of punitive fees.

13. Housing charities to act more as a developer.

Noted; this is an operational matter for the providers rather than policy matter for the Council.

Question Number 18	
Question Text: Do you agree with the proposed approach to planning for specific types of housing?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Chiltern and South Bucks District Council are supportive of Dacorum’s continuous engagement regarding Local Plan matters, but would like to be kept informed of the outcome of the gypsy and travellers needs assessment work, particularly in order to explore whether there are opportunities for Dacorum to meet the needs from Chiltern/South Bucks.	The DtC dialogue will continue and gypsy and traveller issues can be addressed as part of this interaction.
2. Berkhamsted Town Council, Berkhamsted Residents Action Group (BRAG) and Berkhamsted Citizens agree with the planned approach to specific housing, however suggest that there is a need for more sheltered one-person elderly accommodation in low relief areas in the centre of Berkhamsted with good accessibility to local facilities along public transport routes. The current shortfall in residential and nursing care beds, the loss of ‘step down’ beds and the constraints of bed blocking at West Herts Hospital needs to be taken into consideration within the SHMA. Furthermore, DBC should set proportional targets for specific types of	Noted; the needs for specialist accommodation will be addressed in the LHNA which will inform the housing mix sought through the Local Plan policies and allocations.

accommodation, such as the South West Hertfordshire housing mix figures in the SHMA.	
3. Little Gaddesden Parish Council support Dacorum's proposed approach to planning for specific housing types, but made no further comment.	Noted
4. Markyate Parish Council agree with the planned approach, however suggest that specific types of housing should be carefully and appropriately located to prevent elderly individuals from becoming isolated from the local community.	Noted: accessibility is one of the factors that will be taken into account when identifying, assessing and allocating sites for residential development.
5. Northchurch Parish Council support the prospective approach to the delivery of specific types of housing, but view that there needs to be a residential care home in central Northchurch or Berkhamsted. The proposed site, Be-h8, has poor accessibility and connectivity to the town centre, isolating elderly residents that do not have access to a car.	Noted; the needs for specialist accommodation will be addressed in the LHNA which will inform the housing mix sought through the Local Plan policies and allocations. Accessibility is one of the factors that will be taken into account when identifying, assessing and allocating sites for residential development.
6. Grovefields Residents Association agree with the proposed approach to planning specific types of housing, provided that the accommodation is delivered in an efficient and timely manner in line with the availability of Brownfield sites.	Noted: the housing trajectory will be developed to support allocations and ensure that delivery is planned and coordinated.

Question Number 18

Question Text: Do you agree with the proposed approach to planning for specific types of housing?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **St Albans City and District Council** suggest that the implications of paragraph 6.3.5 needs to be appropriately considered. They state that a wide range of housing sizes and tenures will be required on strategic sites; while housing density should be high in order to maximise the potential of Greenbelt land and provide the appropriate mix of housing. The provision of two and three bedroom housing units is favourable as it meets the assessed need and increases the affordability of housing in Dacorum. Moreover, housing size and tenure is an important issue to be considered when planning for cross-boundary development in East Hemel Hempstead.

The SW Herts wide LHNA will be used to identify the appropriate mix of housing types and tenures.

DBC and SADC already have a close working relationship in respect of proposed cross border development and this will be maintained and developed.

The location and density of housing will be addressed through the Local Plan evidence base including the Site Assessment Study, Urban Capacity Study and Green Belt Studies.

2. **Aylesbury Vale District Council** would like to be informed of the findings from the latest Gypsy and Traveller Accommodation Assessment. AVDC question how the threshold of 35-40% affordable housing fits with the definition of affordable housing outlined in the 2016 Housing White Paper and the Housing and Planning Act 2016 – DBC should consider including starter homes in the definition of affordable housing.

The DtC dialogue will ensure that gypsy and traveller study information and issues can be addressed.

The LHNA will provide evidence in respect of affordable housing including advice on mix/tenure including the current definitions in the NPPF.

Question Number 18

Question Text: Do you agree with the proposed approach to planning for specific types of housing?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

3. **Welwyn Hatfield Borough Council** state that it is not realistically possible to meet the Gypsy and traveller requirements on standalone sites only. There is no mention of Transit provision in the new Local Plan – WHBC would like Dacorum to consider providing a new pitch in the Borough as they have done. Additionally, WHBC would welcome a continuous country-wide dialogue between local authorities regarding Gypsy and Traveller accommodation.

The Council's Gypsy and Traveller Accommodation Assessment will provide the evidence to guide the Local Plan approach to delivering sites. Cross boundary and wider issues can be explored through the DtC process.

4. **Tring Town Council** view that existing CS22 Policy on Gypsy and Traveller sites in the Core Strategy is too simplistic and should not be continued. The supply of pitches is not aligned with the demand in Dacorum.

The Council's Gypsy and Traveller Accommodation Assessment will provide the evidence to guide the Local Plan approach to delivering sites.

5. Consideration should be given to the inclusion of a specific policy in the Local Plan that supports the provision of accommodation for older people.

The need for policies to cover particular housing needs will be informed by the LHNA.

6. Accommodation is needed for elderly people in Dacorum who wish to downsize from their larger family homes and do not require nursing care.

Noted: the need for policies to cover particular housing needs will be informed by the LHNA.

7. There needs to be a greater provision of affordable homes for young people and families, not additional care homes for the elderly.

Noted: the need for policies to cover particular housing needs will be informed by the LHNA.

Question Number 18

Question Text: Do you agree with the proposed approach to planning for specific types of housing?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

8. In order to ensure integration within the local community, specialist accommodation for older people needs to be in close proximity and well connected to regular public transport (bus) routes and social infrastructure such as a doctors surgery.

Noted: the need for policies to cover particular housing needs will be informed by the LHNA.

Wider principles set out in the NPPF and the wider Local Plan evidence base will inform decisions in respect of site allocations.

Question Number 19

Question Text: Do you agree with the proposed approach to the timing of site delivery?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Hertfordshire County Council** supports the potential capacity for Green Belt sites to deliver key infrastructure in Dacorum, provided that the infrastructure requirements and sustainable objectives are fully incorporated into the site masterplans and the Sustainability Note.

Noted: The provision of infrastructure will be guided by the IDP. Release of Green Belt sites will be informed by the evidence base including: Green Belt Studies, Site Assessment Study, Urban Capacity Study.

The plan will be subject to SA/SEA to confirm that the strategy is sustainable in line with NPPF policy and guidance.

2. **Tring Town Council** state that it is a priority to deliver infrastructure as development takes place; while employment land should be provisioned prior to new housing development. Moreover, TTC view that local residents should be consulted before the phasing of development is determined.

Noted: The provision of infrastructure will be guided by the IDP.

The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.

	There will be further consultation with all before the plan is submitted for examination. Such consultation will be carried out in accordance with the adopted SCI.
3. Northchurch Parish Council supports the release and development of Brownfield sites prior to Greenfield sites, but disagrees with the prospective Green Belt sites allocated for development.	<p>Noted: at this time no sites in the Green Belt have been proposed for development. Any sites proposed will be put forward in line with the evidence collected to support the Local Plan, including IDP, Site Assessment Study and Green Belt Studies.</p> <p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p>
4. The Chiltern Conservation Board and The Chiltern Society support the delivery of housing sites in phases, strongly prioritising the release of Brownfield sites. Strict controls on the release of Green Belt land must remain in place to protect the ecological character of the Chilterns AONB.	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p> <p>Proposals likely to impact the setting of the CAONB will be considered for LVIA and the whole plan will be subject to SA/SEA supported by HRA (and AA if necessary) to address identified sites of biodiversity/ecological value.</p>
5. Berkhamsted Schools Group supports DBC's proposed approach to housing delivery, but ask DBC to clearly define what constitutes a 'large Green Belt site'. Sites such as Be-h2 Halsam Fields should be released without delay to ensure the housing demand is met.	The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.
6. Large sites should be released early in a proportionate and controlled manner to secure the provision of infrastructure to mitigate development and set a precedent for the greater delivery of housing.	The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.

Question Number 19**Question Text: Do you agree with the proposed approach to the timing of site delivery?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations**Officer response**

1. **St Albans District Council** assert the need for significant investment in infrastructure in line with the increase in housing development. The delivery of infrastructure must be considered in the phasing plan – likely requirement for a stepped land supply to ensure compliance with the Five Year Housing Land Supply.

The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.

The need for a stepped trajectory for delivery will be considered to ensure that development is delivered in a coordinated and sustainable manner.

2. **Berkhamsted Town Council** (BTC), Berkhamsted Residents Action Group (BRAG) and Berkhamsted Citizens Association share the same views. Confirmation is required that paragraph 6.4.2 relates to ‘Urban’ sites and not Green Belt land. In reference to 6.4.4, Brownfield sites should be released prior to Greenfield sites in line with Government guidance, and the ‘good reasons’ in the Core Strategy must be adhered to. Prospective housing development in towns and villages, such as Berkhamsted, should be phased and the detrimental impact of the cumulative delivery of small and medium sites must be considered. While, the delivery of smaller land parcels should be promoted to reduce dependence on larger sites coming forward.

Noted; points of detail will be clarified as the plan is drafted to ensure the strategy and priorities for development are clear.

Policy and site allocation development will have full regard to current national planning guidance in the NPPF, supporting PPG and any relevant case law.

Existing policies will be reviewed for compliance with the NPPF, supporting PPG and any relevant case law and revised, updated or replaced as appropriate.

The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.

<p>3. Markyate Parish Council is concerned that developers proposing housing development on Green Belt land do not take into account the infrastructure needs of the local area; resulting in insufficient infrastructure provision e.g. Hicks Road development.</p>	<p>The infrastructure needs arising from development proposals will be addressed through the IDP and the wider Local plan evidence base.</p> <p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p>
<p>4. Grove Field Residents Association view that the 'exceptional circumstances' warranting the release of large Green Belt sites is yet to be proven by Dacorum. Additional evidence and examination are required to demonstrate the need for Green Belt housing sites to be in Tring. Priority should be given to securing the continuous delivery of Brownfield sites across the Plan Period by increasing the regularity of strategic site appraisals and housing land availability assessments.</p>	<p>Noted: at this time no sites in the Green Belt have been proposed for development. Any sites proposed will be put forward in line with the evidence collected to support the Local Plan, including IDP, Site Assessment Study and Green Belt Studies.</p> <p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p>
<p>5. St Albans Diocesan Board of Finance support a phased approach to housing delivery and the use of the planning consent route 'Permission in Principle' to facilitate sites coming forward. Additionally, they view that sites requiring less infrastructure to support the development should be brought forward early on in the Plan Period and the implications of the Housing Delivery Test should be taken into account.</p>	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p> <p>The use of Permission in Principle will be considered as part of the development plan as a possible option to speed up delivery of development of all types.</p>
<p>6. Taylor Wimpy Strategic Land suggest that large Green Belt sites should be released early on in the Plan Period to secure the delivery of crucial infrastructure and encourage Brownfield sites to come forward.</p>	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p>

<p>7. Tring in Transition view that phased site development should be accompanied by the provision of play space for children early on in the development process.</p>	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p> <p>The phasing of sites will address the delivery of all aspects needed to deliver sustainable development; this will include the provision of children's play space.</p>
<p>8. It is unclear whether a phasing plan for housing delivery and sites is going to be introduced in the Local Plan.</p>	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p>
<p>9. The staggered and phased release of housing sites artificially restricts the delivery of large Green Belt sites that are highly deliverable (i.e. lacking the constraints faced by Brownfield sites) early on in the Plan period. Large Green Belt sites should be released early on in the Plan period to ensure that the delivery of housing is maintained in line with the 5-year land supply.</p>	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p> <p>The deliverability of sites will be considered on a site by site basis and will have regard to available evidence on delivery patterns. Such evidence will include that specifically gathered to support the Local Plan and other robust research prepared at a wider level such as regional or national.</p>
<p>10. Brownfield sites should not be prioritised for delivery, as they are subject to natural delays in the house building process, notably ownership, contamination, land assembly and viability issues, which hinder development.</p>	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p> <p>Any evidence that suggests delivery on brownfield sites is slow will be taken into account.</p>
<p>11. Green Belt land should not be built on at all. They are a physical buffer to conurbation and urban sprawl and</p>	<p>National policy on Green Belt contained in the NPPF does not preclude the release of Green Belt land for development. Any</p>

<p>makes up the natural heritage of towns and villages. Green Belt land must be protected in line with Government Policy.</p>	<p>release should, however, only take place in exceptional circumstances.</p> <p>Any release of Green Belt sites will be informed by the evidence base including: Green Belt Studies, Site Assessment Study, and Urban Capacity Study.</p>
<p>12. The infrastructure in towns and villages is at capacity and insufficient to support the delivery of housing proposed in Dacorum. The infrastructure must be delivered before development occurs; while developers should be responsible for delivering infrastructure items.</p>	<p>The phasing of development will be addressed through the detailed policies of the plan and individual sites to deliver a balance between new homes, new employment and supporting infrastructure.</p>

Question Number 20	
Question Text: “Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?”	
YES	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Hertsmere Borough Council, Berkhamsted Town Council & Markyate Parish Council all agree with definition with no further comments.	Noted.
2. Watford Borough Council supports overall approach. Asks DBC to consider infrastructure within, between areas and nearby settlements, considering benefits employment areas in surrounding areas.	Noted: Infrastructure delivery will be key to delivering sustainable development and will be addressed through the IDP
3. Chiltern and South Buckinghamshire District Council would like regular updates on defining targets for industrial space, scale of employment locations and the impact on local transport networks.	Noted; this information can be shared through the DtC process
4. Tring Town Council would like DBC & South West Hertfordshire to consider the impact of regional growth to the area, specifically the Oxfordshire/Cambridgeshire arc economic growth.	Noted: cross border and wider implications of development will be addressed through the DtC process which encompasses a broad range of stakeholders including other LPA, Government Bodies and infrastructure providers.
5. Some residents have lack of confidence in DBC’s ability to influence economic activity in the area.	Noted; the NPPF sets out that economy is a key element of sustainable development and a material planning considerations.
6. Connectivity to Buckinghamshire should be considered, specifically Chesham & Ayelsbury.	Noted: this will be addressed through the IDP, traffic and transport modelling (in conjunction with HCC) and DtC discussions.

Question Number 20

Question Text: “Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

7. **SADC** should be included as Hemel Hempstead infrastructure is impacted by St Albans. St Alban’s as a city should take responsibility for the impact they have on local infrastructure for South West Hertfordshire.

Officer response

Noted: this will be addressed through the IDP, traffic and transport modelling (in conjunction with HCC) and DtC discussions.

Question Number 20	
Question Text: “Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Welwyn Hatfield Borough Council states that SADC falls into their Functional Economic Area. WHBC asks SWH to consult with them regarding employment growth & land supply. Fluctuating employment rates should be monitored.	The evidence available from the Economy Study demonstrates that SADC falls within the SW Herts FEMA; however, it is noted that there is overlap with other FEMA and this is recognised in the study
2. Historic England are not referred to. Local character of the area must be considered when determining employment growth. Out-of-town shopping disadvantages on high street employment should be considered.	Noted: Historic England is a DtC partner. The evidence base includes studies covering retail and the wider economy and this evidence will inform the development of an appropriate sustainable development strategy.
3. Central Bedfordshire Council states that the definition must be evidenced.	Noted: the Council is establishing a comprehensive evidence base to support all aspects of the emerging plan ready for submission in support of the plan at examination.
4. Northchurch Parish Council must recognise that residents commute outside of the SWH area. There is little scope for industry and warehousing in Northchurch and Berkhamsted.	Noted
5. BRAG & Dacorum Health Action Group both state the lack of consideration for the Borough’s proximity to London and commuting patterns. Topography of the area should also be addressed when considering economic growth.	Noted; the evidence base will address relevant factors in relation to the FEMA including the characteristics of the area and travel to work patterns.

Question Number 20	
Question Text: “Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
6. GFRA raises concerns on impacts to Tring & Berkhamsted as a consequence of growth west to the villages should be considered. Co-operation with Aylesbury Vale and Central Bedfordshire should be considered.	Noted: cross boundary issues will be addressed through the DtC process.
7. FEMA should only be considered in Towns with the supporting infrastructure and not villages.	Noted: the FEMA covers a wide (SW Herts) area and is not specific to individual settlements.
8. Empty office space to be filled prior to new office space being constructed.	Noted
9. There is a need for new economic growth to be allocated to local residents within the region and not support in-going commuters to the area. This can consequently result in the increase of local housing need.	Noted: the Planning system can only seek to create employment opportunities it cannot seek to manage who takes up those opportunities.
10. Lack of co-operation between SADC and TRDC exasperating DBC’s employment growth issues.	There is continuing positive DtC engagement with both SABC and TRDC
11. Particular concern regarding a business park in Kings Langley and the consequential impacts it would bring on local infrastructure.	No sites have yet been allocated for development as part of the Local Plan drafting process. The potential impacts of development will be considered and evaluated as part of the preparation of the Local Plan evidence base.

Question Number 21

Question Text: Do you agree with the proposed approach to meeting future jobs growth?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Chiltern and South Bucks District Council** state that a target needs to be defined for industrial/warehouse land and the scale and impact of strategic employment locations on the local infrastructure. Moreover, they would like to be kept informed on the progress of the issues outlined above.

Noted; The Economy Study will provide evidence to support the setting of targets and the IDP will identify infrastructure requirements.

Information on progress and future proposals can be shared through the DtC process.

2. **Hertsmere Borough Council** support the Plan's recognition of the significant link between housing delivery and job growth; however view that the targets for future employment need to be agreed through continuous joint working and a Statement of Common Ground with the FEMA authorities.

Noted; the SW Herts FEMA study will inform any targets which will be discussed with fellow SW Herts through DtC and other discussions.

Question Number 21

Question Text: Do you agree with the proposed approach to meeting future jobs growth?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations	Officer response
<p>3. Berkhamsted Town Council agree with the Plan’s approach to job growth; but state that Green Belt sites should not be allocated for the provision of employment land until the need for job growth in Dacorum is overtly proven. The release of Green Belt land should be postponed until such a time is reached. Furthermore, the type of jobs provisioned in Dacorum should be closely monitored in line with the rate of technological change in the employment sector.</p>	<p>Noted: Any release of Green Belt land will be informed by the Local Plan Evidence base including: the Urban Capacity Study, the Green Belt Reviews and Economy Study.</p> <p>Any release of Green Belt land will be considered on a comprehensive basis to ensure that the Plan delivers coordinated, sustainable development.</p>
<p>4. Northchurch Parish Council support the prospective job growth as outlined in the Issues & Options document. Yet, they are not in favour of the Government’s policy on ‘Permitted Development Rights’ that has resulted in the conversion of numerous office buildings into residential properties.</p>	<p>Noted: permitted development is set by national statutory provisions and cannot be influenced directly by the Local Plan. The impacts of such changes of use will be considered taking account of the findings of the Economy Study and recent work carried out on behalf of the LEP</p>

Question Number 21	
Question Text: Do you agree with the proposed approach to meeting future jobs growth?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
1. The Chilterns Conservation Board state that the plan and evidence base need to be prepared for and responsive to future technological change in the workplace, including flexible and home working in rural areas. Additionally, there should be increased employment opportunities in the rural leisure industry to facilitate the protection of areas such as the Chilterns AONB.	Noted; the Economy Study and other evidence, including recent work by the LEP on loss of floor space will be considered to assess possible future trends. Policies to support flexible work models and promote high speed/capacity internet connectivity will be considered.
2. Markyate Parish Council suggest that more office jobs should be provisioned for in the Town Centres in Dacorum to combat the reduced work opportunities in warehouses.	Noted: the balance of employment opportunities and locations will be assessed using available evidence including the Economy study.
3. Tring Town Council suggest that the Issues and Options document neglects the strategic economic opportunities of Dacorum, opting for an increase in warehousing units and the provision of low paid jobs. Moreover, job growth is further hindered by the government's Permitted Development Rights/Prior Approval policy. While, sites for small and large business parks with good transport links should be identified e.g. Icknield Way Industrial Estate and Tr-h5 Dunsley Farm.	No decisions have yet been made on the allocation or mix of employment uses. The Economy Study will inform the locational and strategic approach to employment as the Local Plan develops.

Question Number 21	
Question Text: Do you agree with the proposed approach to meeting future jobs growth?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
4. Aylesbury Vale District Council query whether additional employment needs can be met outside of SW Herts Functional Economic Market Area (FEMA) and if the floor space figures stated in the Issues & Options document are derived from the South West Hertfordshire Economic Study.	Noted; it is not envisaged that the SW Herts need will be met outside the FEMA at this time. Any proposals put forward in the Local Plan will take full account of the findings of the South West Hertfordshire Economic Study
5. Welwyn Hatfield Borough Council state that there is a need for continuous joint working and communication between local authorities in the SW Herts Functional Economic Market Area and Welwyn Hatfield Functional Economic Market Area concerning employment. Furthermore, it is key that the fluctuation of the economy, population demographics and employment provision in other FEMA authorities are taken into consideration when setting job targets.	Noted; this can be delivered through the DtC activities of individual councils augmented by meetings between the different groups covering the FEMAs and the LEP.
6. Historic England view that Chapter 7 of the Issues & Options document does not consider the importance of the historic environment in relation to employment opportunities and economic growth. Furthermore, the sites allocated for employment, retail and tourism should be sustainably located and carefully managed; preventing harm to Dacorum's valuable heritage assets. While, out of town retail centres should not be constructed due to their direct impact on the vitality and investment in town centres.	Noted; the overall sustainability of the Plan will be addressed through the SA/SEA. The Local Plan will address the importance of the historic environment in relation to employment opportunities and economic growth in accordance with the provisions of the NPPF. Any proposals for retail will be informed by the provisions of the NPPF, and the findings of the Economy and Retail studies.

Question Number 21	
Question Text: Do you agree with the proposed approach to meeting future jobs growth?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
7. St Albans City and District Council suggest that the strategic importance of the Enterprise Zone and its position in the Hertfordshire LEP is not considered. The Issues & Options document does not appropriately consider the significance of office space with regards to job growth. Additionally, there needs to be significant transport improvements around Maylands and the Enterprise Zone, as it runs the risk of being outcompeted by a new employment area. Furthermore, unattractive, vacant employment land should be utilised to deliver housing; relieving pressure on the Green Belt.	Noted: this will be considered as the plan develops and informed by the evidence base including the Economy Study which has been jointly prepared by the SW Herts Authorities (including SADC). The possibility of redeveloping existing employment sites for housing will be considered through the Urban Capacity Study.
8. Berkhamsted Residents Action Group view that the Issues & Options document does not appropriately consider the socioeconomic impact of commuting on Dacorum's local centres, communities and housing availability.	The impacts of commuting will be considered and this assessment will be informed by the findings of the Economy Study.
9. Grove Fields Residents Association view that there is a limited capacity for commercial growth in Tring and that any proposed economic growth should be in line with its historic character as a small market town.	Noted: any proposals for economic development in Tring will be informed by the Economy Study and the wider local plan evidence base.
10. Insufficient office space renders Dacorum commercially unattractive, resulting in reduced economic investment and a high proportion of individuals commuting to London and beyond to seek employment	Noted; the provisions for new office space and protection of existing office space will be informed by the Local plan evidence base including the Economy study.

Question Number 21

Question Text: Do you agree with the proposed approach to meeting future jobs growth?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

11. Housing development should be delivered in line with prospective job growth and located nearby employment centres such as Maylands; ensuring the accessibility of the local workforce.

Noted; the need to balance new homes with new jobs will be addressed as the plan develops and will be informed by the Local Plan evidence base.

Question Number 22

Question Text: Do you agree with the proposed approach to choosing sites to accommodate job growth?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Chilterns Conservation Board** as long as new facilities for visitors in the AONB are designated and sited sympathetically, and that new activities are appropriate. Visiting encourages people to care for and protect the AONB, and provides enjoyment and wellbeing. The Chilterns Board also states that the plan should recognise where there are high levels of visitor pressure, and if these affect the natural environment.

Noted: these points will be taken into account in developing the Local Plan.

The sustainability of the plan in relation to location of development and impacts from potential additional visitor numbers will be addressed through the SA/SEA, supplemented by the HRA (and AA if needed) in respect of designated sites.

2. **Berkhamsted town council** support but they recognise that more infrastructure is needed to support tourism (Parking, Transport, and Hotels). They also mention how a balance needs to be struck between tourism and it's impacts, as high visitor pressures cause urban and natural impacts (National Trust in Ashridge having to create a controlled car park to cope with visitor numbers). Excessive development would ruin the appeal for tourists (especially in Berkhamsted).

Additional infrastructure needs will be identified through the IDP.

The sustainability of the plan in relation to location of development and impacts from potential additional visitor numbers will be addressed through the SA/SEA, supplemented by the HRA (and AA if needed) in respect of designated sites such as the SAC including the Ashridge Estate.

3. **Historic England** (comment 2) role could be improved by recognising the role of the historic environment, creating locally distinct places. Acknowledgement of the contribution the historic environment makes to wider to the tourism sector will improve the soundness of the forthcoming Plan.

Noted; the overall sustainability of the Plan will be addressed through the SA/SEA.

The Local Plan will address the importance of the historic environment in relation to tourist sector in accordance with the provisions of the NPPF.

Question Number 22

Question Text: Do you agree with the proposed approach to choosing sites to accommodate job growth?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

4. **Northchurch Parish** St Marys in Northchurch is one of the oldest Saxon Churches in Hertfordshire and was mentioned in the Domesday Survey, Northchurch also pre-dates Berkhamsted, it had a Roman Villa / settlement dating back to around AD 60, and this should be added to the Dacorum Historical data. Improved accommodation and parking would encourage more visitors in the area.

Noted: these points will be taken into in the development of the Local Plan.

5. **Natural, Historic and Built environment HCC** The approach to tourism should take into account the need to mitigate the impact of increasing visitor pressure upon the quality of countryside attractions, in particular key honey pot sites. In addition, the historic environment should be given due weight.

Noted: these points will be taken into account in developing the Local Plan.

The sustainability of the plan in relation to location of development and impacts from potential additional visitor numbers will be addressed through the SA/SEA, supplemented by the HRA (and AA if needed) in respect of designated sites.

Question Number 22	
Question Text: Do you agree with the proposed approach to choosing sites to accommodate job growth?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Markyate Parish Council the approach needs to be more inclusive of small rural businesses and their communities. Suggested direct involvement with Canal and River trust to promote the Grand Union Canal and Tring Reservoirs (unique and vastly untapped potential for tourism).	Noted: this will be considered in the Development of the Plan. The Local Plan is not a promotional document and engagement of CRT as suggested would not be appropriate; however, CRT have made comments in response to the I+O consultation and these will be taken into account.
2. Historic England (comment 1) no mention of how the boroughs historic environment will effect the economy, and the opportunity for growth it provides. Also new tourism sites need to be sustainably located and appropriate to mitigate harm. Existing sites need to be managed.	Noted: The Local Plan will address the importance of the historic environment in relation to tourist sector in accordance with the provisions of the NPPF.
3. Tring Town Council tourism should be resourced and play a significant part in the plan. The target market begins with local residents (promote high street)	Noted: these points will be taken into account in developing the Plan. The economic roll of tourism is noted.

Question Number 23	
Question Text: “Do you agree with the proposed approach to meeting future retail needs?”	
YES	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Chilterns Conservation Board would like technology advancements to be considered in the new Local Plan. Plans should also prepare for the reducing need for large retail floor space.	Noted: the provision of high speed internet connectivity as part of new development will be considered as the plan develops. The changing nature of retailing will be addressed; this will be informed by the retail and economy studies.
2. Berkhamsted Town Council seeks consideration for a focus of retail development occurring in Berkhamsted Town Centre. Viability assessments on local centres should take place to avoid centres being built that are not commercially sustainable.	Noted: the retail strategy will be considered having regard to these and other comments along with the Local Plan evidence base including the retail study.
3. North Church Parish Council confirm the need for retail plans in Berkhamsted Town Centre.	Noted
4. BRAG share concerns over the impact of congestion and pollution to the local area as a consequence of out-of-town shopping. BRAG agree that retail development should be concentrated in Berkhamsted Town Centre.	Noted: the retail strategy will be considered having regard to these and other comments along with the Local Plan evidence base including the retail study.
5. Town centre shopping should be considered more than out-of-town retail shopping.	Noted: the retail strategy will be considered having regard to these and other comments along with the Local Plan evidence base including the retail study.
6. The plan should consider sizing of retail outlets and the sizing of local centre floor space.	Noted: the retail strategy will be considered having regard to these and other comments along with the Local Plan evidence base including the retail study.

Question Number 23	
Question Text: “Do you agree with the proposed approach to meeting future retail needs?”	
YES	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
7. Insufficient parking for retail areas in high streets, particularly within Tring and Berkhamsted.	Noted: the retail strategy will be considered having regard to these and other comments along with the Local Plan evidence base including the retail study. Consideration will also be given to prioritising non-car based transport options as part of new development.
8. Residential building should be considered above retail space to mitigate town centre visitor congestion and parking constraints.	Noted: this will be considered and will be considered in parallel with the Urban Capacity Study
9. Concerns raised over the increase of antisocial behaviour and the consequential impact on local centre viability.	Noted: plan policies will seek to promote high quality design which includes minimising opportunities for committing crime and minimise the fear of crime.
10. DBC should consider regenerating existing shopping spaces rather than introducing new retail spaces for the Borough.	Noted: regeneration opportunities will be considered as part of the overall development strategy.
11. Encourage businesses that reflect local character and residential demand, particularly in smaller residential areas such as Tring.	Noted; plan policies will seek opportunities to ensure sustainability by directing the right use to the right location.
12. Large retail floor space in Hemel Hempstead is not utilised sustainably, with shop content low.	Noted; the Retail and Economy Studies provide evidence on current market trends. The Urban Capacity will look at opportunities to reuse existing under utilised sites.
13. Dacorum has a large range of shops, with concerns over the residential need for more food outlets.	The need for additional food outlets to support new development is addressed in the Retail Study.

Question Number 23	
Question Text: “Do you agree with the proposed approach to meeting future retail needs?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Markyate Parish Council share concerns over the increasing number of food outlets opening across the Borough. Concerns over poor public transport links with town centres also shared. Largely recognised retail chains should be made attracted to town centres.	Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.
2. Tring Town Council suggests that DBC should take the focus away from square meter age of retail floor space and consider ways to generate economic vibrancy in high streets.	Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.
3. Historic England suggests DBC recognise in their policy the importance the historic environment has on the economy. DBC should consider the negative impact on town centre retail space when introducing new out-of-town shopping outlets.	Noted: the retail strategy will be considered having regard to these and other comments along with the Local Plan evidence base including the retail study.
4. Grove Fields Residents association and The Little Cloth Rabbit both indicate a need for regeneration in Berkhamsted and Tring town centres.	Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.

Question Number 23		
Question Text: “Do you agree with the proposed approach to meeting future retail needs?”		
NO		
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>		
Key points raised in representations	Officer response	
5. Capital and Regional PLC are welcome to working with DBC on the next Local Plan stage to consolidate retail space, particularly focussing on quality of retail space in Hemel Hempstead Town Centre, including diversifying Marlowes.	Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends. The Council will look to engage with site owners and developers as necessary at appropriate stages as the plan develops.	
6. A suggested focus on encouraging small and local businesses to town centres supporting the local economy. Increasing technologies should be considered, alongside increasing demand for delivery services lessening the need for large food superstores/outlets.	Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.	
7. Boutique shopping experiences should be of a focus, such as restaurants/bars etc.	Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.	
8. Empty retail spaces should be considered first prior to introducing new retail spaces.	Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.	

Question Number 23

Question Text: “Do you agree with the proposed approach to meeting future retail needs?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

9. Tring town centre has limited scope for growth, and existing shop fronts are not utilised with residential demand in mind.

Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.

10. More needs to be done to attract Kings Langley and South Hemel Hempstead residents back to shopping in Dacorum rather than Watford.

Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.

11. DBC should consider pedestrianizing all highstreets across the Borough to encourage visitors. Redirecting of routes and the implementation of correct infrastructure would make this feasible.

Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.

12. DBC should consider the scope to improving quality and permanence of retail floor space while meeting anticipated growth in retail spend. Diversifying retail offer can increase the “dwell-time” in retail.

Noted: the Retail Study provides evidence in respect of the form and function of existing town centres. This will inform the development of policies to support viable and vital town centres in the face of changing retail patterns and trends.

Question Number 24	
Question Text: Do you agree the proposed approach to encouraging tourism?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Berkhamsted town council support but they recognise that more infrastructure is needed to support tourism (Parking, Transport, and Hotels). They also mention how a balance needs to be struck between tourism and it's impacts, as high visitor pressures cause urban and natural impacts (National Trust in Ashridge having to create a controlled car park to cope with visitor numbers). Excessive development would ruin the appeal for tourists (especially in Berkhamsted).	Noted: the comments will be taken into account in developing the plan. The overall sustainability of the proposals in the Local Plan will be addressed through the SA/SEA with HRA assessing impacts on protected/designated sites followed by AA, when necessary, to identify appropriate mitigation.
2. Chilterns Conservation Board as long as new facilities for visitors in the AONB are designated and sited sympathetically, and that new activities are appropriate. Visiting encourages people to care for and protect the AONB, and provides enjoyment and wellbeing. The Chilterns Board also states that the plan should recognise where there are high levels of visitor pressure, and if these affect the natural environment.	Noted: these points will be taken into account in developing the Local Plan. The sustainability of the plan in relation to location of development and impacts from potential additional visitor numbers will be addressed through the SA/SEA, supplemented by the HRA (and AA if needed) in respect of designated sites.
3. Historic England (comment 2) role could be improved by recognising the role of the historic environment, creating locally distinct places. Acknowledgement of the contribution the historic environment makes to wider to the tourism sector will improve the soundness of the forthcoming Plan.	Noted; the overall sustainability of the Plan will be addressed through the SA/SEA. The Local Plan will address the importance of the historic environment in relation to tourist sector in accordance with the provisions of the NPPF.

Question Number 24

Question Text: Do you agree the proposed approach to encouraging tourism?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

4. **Northchurch Parish** St Marys in Northchurch is one of the oldest Saxon Churches in Hertfordshire and was mentioned in the Domesday Survey, Northchurch also pre-dates Berkhamsted, it had a Roman Villa / settlement dating back to around AD 60, and this should be added to the Dacorum Historical data. Improved accommodation and parking would encourage more visitors in the area.

Noted: these points will be taken into in the development of the Local Plan.

5. **Natural, Historic and Built environment HCC** The approach to tourism should take into account the need to mitigate the impact of increasing visitor pressure upon the quality of countryside attractions, in particular key honey pot sites. In addition, the historic environment should be given due weight.

Noted: these points will be taken into account in developing the Local Plan.

The sustainability of the plan in relation to location of development and impacts from potential additional visitor numbers will be addressed through the SA/SEA, supplemented by the HRA (and AA if needed) in respect of designated sites.

Question Number 24	
Question Text: Do you agree the proposed approach to encouraging tourism?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Markyate Parish Council the approach needs to be more inclusive of small rural businesses and their communities. Suggested direct involvement with Canal and River trust to promote the Grand Union Canal and Tring Reservoirs (unique and vastly untapped potential for tourism).	Noted: this will be considered in the Development of the Plan. The Local Plan is not a promotional document and engagement of CRT as suggested would not be appropriate; however, CRT have made comments in response to the I+O consultation and these will be taken into account.
2. Tring Town Council tourism should be resourced and play a significant part in the plan. The target market begins with local residents (promote high street)	Noted: these points will be taken into account in developing the Plan. The important roll of tourism is noted. The local aspect of tourism/visits to places of interest is noted.
3. Historic England (comment 1) no mention of how the boroughs historic environment will effect the economy, and the opportunity for growth it provides. Also new tourism sites need to be sustainably located and appropriate to mitigate harm. Existing sites need to be managed.	Noted: The Local Plan will address the importance of the historic environment in relation to tourist sector in accordance with the provisions of the NPPF.

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Hertfordshire County Council** ask for the Council to review policy on the Natural Environment including the Chilterns AONB management plan, DEFRA 25 year plan and the NPPF which have or will be updated in the near future.

The Council acknowledge these comments, as part of the Local Plan process all of these documents will be reviewed in alignment with National Planning Policy Framework and Planning Policy Guidance. The Chilterns management plan is currently being reviewed and we will take into account it policies, principles and content. Further evidence and consideration of the Natural environment will be addressed through our Sustainability Appraisal, Strategic Environmental Assessment and Habitat Regulation Assessment and Appropriate Assessment if required.

2. **Hertfordshire Ecology** makes some amendments to the Environmental Designations section of the consultation document. There should be no net ecological loss and should make reference to the mitigation hierarchy of important ecological assets.

The Council acknowledge these comments. The County Council is currently in the process of updating its Green Infrastructure study, which will feed into our evidence base.

This will also be supported by Habitat Regulation Assessment, Sustainability Appraisal and Strategic Environmental Assessment, which will inform us of the potential impact to ecology. Should an impact be identified by this or the site assessment work step will be taken to ensure any impact is mitigated. If this cannot be will consider introducing policies for contributions for sustainability offsetting.

Question Number 25**Question Text: Do you support the proposed approach to the natural environment?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

3. **Watford Borough Council**- Need to work with neighbouring authorities and stakeholders to protect ecological corridors and shared assets such as the Grand Union Canal.

Officer response

The Council acknowledges this, as part of our duty to cooperate we will consult with the relevant stakeholders and authorities.

Protection of environmental assets is of importance to the Council and we will consider developing policies that will be retained in alignment with our Green Infrastructure study. Formulation of policies seeking to safeguard identified assets will be subject to further consultation with the relevant bodies including Natural England and neighbouring authorities if these assets are cross boundary.

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

4. Berkhamsted Town Council, Northchurch Parish Council, Berkhamsted Residents Action Group, Berkhamsted Citizens Association and Dacorum Health Action Group all raise concerns about the need to protect ecological corridors and the impacts development along the A41 would have on wildlife in the area. They also raised concern that there was little about the protection of Chalk streams or the Chilterns Conservation Board report on the Cumulative impact of Development on the Chilterns AONB.

Officer response

The Council acknowledge these comments. Issues regarding the protection of ecological corridors will be in alignment with the Hertfordshire County Council Green Infrastructure Study and our Habitat Regulation Assessment, Sustainability Appraisal and Strategic Environmental Assessment.

The Council appreciate that further investigation is need regarding the potential impacts of development in certain sites, and this will be continued as part of our site assessment work. Should any issues arise from this it will be discussed with the relevant stakeholders in how best to mitigate this.

Chalk Streams are identified as being of national importance and so will be protected in the same way as ecological corridors using the same documents.

The protection of all of these environments will be in alignment with the National Planning Policy Framework, Planning Practice Guidance, and site specific Development Management policies.

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

5. Aylesbury Vale District Council- concern for existing commitments surrounding Dacorum and that consideration has not been given for Local Plans outside the Borough. They also ask for Habitat Regulation Assessments to be carried out.

Officer response

The Council acknowledge these concerns, as part of our Duty to Cooperate there will be further consultation with all Councils in which Dacorum's allocations could have a potential impact.

Similarly, we will consult with other relevant stakeholders such as Hertfordshire County Council as the highway authority and service providers to cover any and all issues that may arise.

As part of the Local Plan process the Council is conducting a Habitat Regulation Assessment which will form part of our evidence base.

Question Number 25**Question Text: Do you support the proposed approach to the natural environment?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

6. Several residents make representation regarding the allocation of land including green belt, AONB, ancient woodland, farmland and how this needs to be protected even if it is not designated as this can provide wildlife habitats.

Officer response

The Council acknowledge these comments. The Council aim to retain land for its original uses where possible, however due to the land constraints of the Borough it will likely be necessary to build on some of this land which would be of least ecological importance. This will be informed through our Sustainability Appraisal, Strategic Environmental Assessment and Urban Capacity to work to identify how much green land would be required and then choosing sites which are of least ecological importance.

The Council also understand that some sites may have other areas of interest such as wildlife sites that are not designated. In these cases the Council would aim to retain and enhance these where possible and if such issues were found would result in further consultation with the relevant bodies. The Council will also give consideration to policies to safeguard biodiversity and/or enhance biodiversity.

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

7. Grove Fields Residents Association suggest that there is further need to assess land beyond the AONB and SSSI to include further designations of more local importance. Use of the Green Belt Stage 2 review to form the basis of this.

Officer response

The Council acknowledges these comments and understands the concerns raised. The Landscape Character Assessment identifies those sites that are of special interest to the Borough and will be conserved when possible. The documentation relating to the natural environment will be reviewed as part of the new Local Plan process, and will be supported through our Habitat Regulation Assessment, Sustainability Appraisal and Strategic Environmental assessment.

The Green Belt review helped us to determine where broad areas may be appropriate for development; however, this will be subject to further consultations with the relevant stakeholders. It would not be possible to assess all land in this manner as these principles only comply with the Green Belt principles of the National Planning Policy Framework. Should areas of importance be identified these will be subject to further assessment by the relevant bodies and our site assessment work.

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

8. Concern from Herts and Middlesex Wildlife Trust about how well policy will be introduced.

Officer response

The Council acknowledge this. Once policy has been adopted into the Local Plan it will be a material consideration, which will have to be considered as part of the application process. However, balancing the issues relating to the natural environment and providing the necessary housing numbers will likely mean that some Green Belt land will have to be released to meet this need. This will be informed through our urban capacity and site assessment work to ensure only sites that have little to no environmental impact will be chosen.

Question Number 25	
Question Text: Do you support the proposed approach to the natural environment?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
9. Consideration from numerous respondents regarding the protection of blue infrastructure primarily chalk streams and the issues of water extraction and the Grand Union Canal.	<p>The Council acknowledge these comments, sites like the chalk streams are considered as part of our Landscape Character Assessment and so these will be protected. The issues of water of extraction will be considered through Biodiversity policies, and would require further consultation with utility providers to review this. The Council are currently in the process of updating its water study, Sustainability Appraisal and Strategic Environmental Assessment, which will feed into the new Local Plan in how these issues will be addressed.</p> <p>It is recognised that the Grand Union Canal serves as an important asset for both people and wildlife and so these will be protected and enhanced through consultation with neighbouring authorities, and the canals and rivers trust. The formulation of policies to safeguard the canal will be considered.</p>

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

10. Berkhamsted Residents Action Group claim that there is not enough provision for tree-planting, they also do not agree that they will improve access to the natural environment.

Officer response

The Council acknowledge these comments provision for green space will be sought from developers; however, when sites are not of adequate scale to make this feasible contributions will be sought for sustainability offsetting. Access to the natural environment will be considered through the master planning process to ensure that accessibility to green space is provided within new developments. This will be subject to the formulation of policies that reflect these issues.

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

1. Markyate Parish Council want to see duty to cooperate with neighbouring authorities to protect the River Ver.

Officer response

The Council acknowledge these comments, it is requirement that we consult with out Statutory Consultees as listed within our Statement of Community Involvement document. Development would not be encouraged if it were to have an impact on the river as this is considered a special quality of the Borough. This will be reviewed as part of our Habitat Regulation Assessment, Sustainability Appraisal, and Strategic Environmental Assessment work.

<p>2. Tring Town Council concerned that there will be an impact on Chilterns Area of Outstanding Natural Beauty, and the importance of ecological corridors for wildlife and residents.</p>	<p>The Council acknowledge these comments. The Council aim to minimise any potential impact development may have on the Chilterns Area of Outstanding Natural Beauty in accordance with documents adopted into our including the AONB management plan 2014-2019. Once a reviewed document has been produced this will supersede the existing version; the Council is also considering the potential to introduce a policy specifically for the protection of the Chilterns AONB, however this is still subject to further discussion.</p> <p>The Council also acknowledge the importance of ecological corridors and other wildlife habitats that are not formally designated. Where possible these sites will be retained and enhanced, however this may not always be possible in some instances for example if it were to create an area that was poorly connected to the rest of the natural environment. In these instances contributions would be expected so that these areas could be offset through sustainability offsetting and would be informed through our Habitat Regulation Assessment, Sustainability Appraisal, and Strategic Environmental Assessment work.</p> <p>Similarly, there would be subsequent policy introduced to ensure that these are protected either through the Local Plan or through Development Management policies.</p>
<p>3. Central Bedfordshire Council ask for there to be cross boundary consultation to protect natural environment.</p>	<p>The Council acknowledge this, as part of our duty to cooperate we will consult with neighbouring authorities as part of the Local Plan process.</p>
<p>4. Chilterns Conservation board have produced its own policy for the AONB to ensure that it remains protected.</p>	<p>The Council acknowledge these comments and will review the policy recommendation. The Council is aware that there is a need to review policy relating to the natural environment, and ensure that it is consistent with the latest Government guidance</p>

Question Number 25**Question Text: Do you support the proposed approach to the natural environment?****YES**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations**Officer response**

and AONB management plan. This will be part of the Local Plan process to ensure such policy reflects this. The Council is considering whether there is a need for a policy specifically on the protection of the Chilterns AONB, however this is still subject to further discussion.

Question Number 25	
Question Text: Do you support the proposed approach to the natural environment?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. Concern from residents about the protection of the natural environment, not necessarily from development but increased use, suggestions as to whether this can be offset to help preserve sites.	<p>The Council acknowledge these comments and aim to protect the natural environment from development where possible. In regards to the protection from users this would be informed by our Habitat Regulation, Sustainability Appraisal and Strategic Environmental Assessment work, and consultation with landowners about these potential impacts and how these should be addressed.</p> <p>Another option that the Council could encourage would be to form an agreement with developers to provide payments for this specific purpose to enhance and maintain these areas, should it be identified that any site would have a significant impact on the natural environment. This would be something that the Council could pursue and would be subject to discussion with the developer and environmental groups.</p> <p>The Council will update and reflect policy from existing documents into the new Local Plan that relate to the protection of the natural environment. In instances where this could be related to specific development, Development Management policies would also be used.</p>

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

6. Representations regarding site-specific details relating to the natural environment.

The Council acknowledge these comments. Our Habitat Regulation Assessment, Sustainability Appraisal, and Strategic Environmental Assessment work and our further site assessment work will identify for us the issues raised within the sites. Issues will then be considered through consultation with the relevant bodies to address and resolve these. - policy

7. Herts and Middlesex wildlife trust would like the ability to survey sites.

The Council acknowledges this; the trust has already conducted work, which will be incorporated into the new Local Plan. The Council appreciate that further site assessment work is needed and this would be informed through the Habitat Regulation Assessment, Sustainability Appraisal, and Strategic Environmental Assessment. Once this work has been completed and should there be an identified need there will be further consultation with the relevant bodies.

Policies relating to the protection of wildlife will be reviewed and carried forward as part of the Local Plan update process, and similarly this will be reflected in Development Management policies for specific sites.

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

8. Berkhamsted Residents Action Group as well as other residents from around the Borough are concerned about the protection of Green Belt land and ecological corridors and how this would affect views from the natural environment.

Officer response

The Council acknowledge these comments. There is an identified need for further work to be conducted on the Green Belt and there will be consideration of another review-taking place. This will be determined through our Urban Capacity study to determine how much of our housing need can be met within the existing settlement boundaries.

The protection of ecological corridors is an important consideration of the Local Plan and will be informed through the Habitat Regulation Assessment, Sustainability Appraisal and Strategic Environmental Assessment work. This will be further considered within our specific site assessment work, should any issues arise from these studies the Council will consult with the relevant bodies to resolve these issues.

Policy relating to the protection of Green Belt and the natural environment will be reviewed and carried forward into the new Local Plan. Similarly, this will be supported by Development Management policies used on a more site-specific basis.

Question Number 26	
Question Text: do you agree with the proposed approach to the historic environment?	
NO	
<i>If no, please explain what alternative approach to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Buckinghamshire County Council large number of archaeological features near the boundary or cross boundary (Roman Roads). The local plan needs to recognise this and include policies to protect the features (Policies map?).	Noted: the Local Plan will fully address the issues around the Historic Environment taking account of the points raised and having full regard to the NPPF, PPG, primary legislation and case law.

<p>2. Historic England the consultation document dedicates little attention to the historic environment.</p> <p>They request the term “Historic environment” Is used rather than “heritage assets”, as it covers all aspects of heritage. Advise to use irreplaceable in the local plan.</p> <p>We expect to see appropriate references to setting in policies. It is important to understand the significance of any heritage asset/s, and their setting/s. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process, which seeks to understand their significance and value. a focus on distance or visibility alone as a gauge is not appropriate.</p> <p>At site allocation stage, closely liaise with the county archaeologist. If a site has potential, there should be considerations against using the site.</p> <p>Looking for policies, which preserve and enhance listed buildings and their setting. Considering the setting may be cross-boundary, where relevant co-operation is required.</p> <p>HE welcomes any future designations for conservation areas. The policy should anticipate for these future designations.</p> <p>Non-designated Heritage Assets Historic England has published guidance pertaining to Local Listing which you may find helpful: https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/ In national policy terms, ‘non-designated heritage assets’ (including those on a local list) are recognised as having a degree of significance meriting consideration in planning decisions.</p> <p>Robust provision for heritage assets will increase the soundness of the forthcoming plan.</p>	<p>Noted: the Local Plan will fully address the issues around the Historic Environment taking account of the points raised and having full regard to the NPPF, PPG, primary legislation and case law.</p> <p>The use of terms and language will be reviewed and amended as necessary.</p> <p>Further discussion and liaison will take place through DtC with the County Council, other LPA and other statutory bodies listed in the relevant regulations.</p> <p>The Council takes the Historic Environment very seriously and will look to address the issues and concerns raised.</p>
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Question Number 26

Question Text: do you agree with the proposed approach to the historic environment?

NO

If no, please explain what alternative approach to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations	Officer response
<p>3. The Natural, Historic & Built Environment Advisory Team (NHBE) (1) notes that chapter 17 in the Core Strategy refers to conserving the historic environment. This contains useful information and a sound policy (CS27: Quality of the Historic Environment) and this should be continued in the new local plan.</p>	<p>Noted: the Core Strategy will be reviewed as part of the detailed drafting of the Local Plan and the positive elements highlighted will be incorporated/addressed in the new policies and proposals.</p>

Question Number 26	
Question Text: do you agree with the proposed approach to the historic environment?	
YES	
<i>If no, please explain what alternative approach to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Little Gaddesden Parish Council is keen to encourage the commencement of the conservation area character appraisals for LG and Ringshall, and is happy to provide support on the history.	Noted: The Conservation Area Character Assessments are separate from the Local Plan Process; however, the policies will cover all historic assets including conservation areas.
2. Markyate Parish Council adverse effect on their conservation area from the lack of parking. Confusion with the grounds of the Markyate cell.	Noted; the Local Plan policies will cover all historic assets including conservation areas.
3. Tring Town Council Left no comment but selected that they support the proposal.	Noted
4. Northchurch Parish Council support the proposal, however they believe the historic environment should include villages (specifically Northchurch).	Noted; the Local Plan policies will cover all historic assets and aspects of the historic environment including conservation areas and non-designated assets which can include settlements in whole or in part.
5. Berkhamsted Town Council support the proposals and strategy, but the options do not support it. Historic environment should encompass historic towns like Berkhamsted. Defining limited conservation areas whilst destroying the setting has a negative impact on the town.	Noted; the Local Plan policies will cover all historic assets and aspects of the historic environment including conservation areas and non-designated assets which can include settlements in whole or in part.

Question Number 26	
Question Text: do you agree with the proposed approach to the historic environment?	
YES	
<i>If no, please explain what alternative approach to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
6. Hertfordshire Gardens Trust the proposed approach to protect the historic environment is supported; however, the proposals for development are contrary to this. There is too much emphasis on using green belt land and green space, rather than previously developed land. Green belt around tring and the Edward kemp land around Shendish should remain undeveloped to enhance and conserve the historic parks and gardens.	Noted: the Local Plan will seek to strike a balance between new development and the historic environment along with all other material planning considerations. The overall sustainability of the Plan will be addressed through the SA/SEA.
7. Natural, Historic & Built Environment Advisory Team (NHBE) (2) supports the statement that one of the challenges of the Local Plan is to protect the historic environment whilst delivering growth for the Borough of Dacorum. This is because paragraph 126 of the National Planning Policy Framework (NPPF) notes that Local Plans should include a positive strategy for the conservation and enjoyment of the historic environment.	Noted: the Local Plan will seek to strike a balance between new development and the historic environment along with all other material planning considerations. The overall sustainability of the Plan will be addressed through the SA/SEA.

Question Number 27	
Question Text: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?	
YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Little Gaddesden Parish Council suggest that there is a need for greater infrastructure provision, as they are already facing water shortages.	The Council acknowledge these concerns. The provision of infrastructure is determined through the Infrastructure needs for different scales of development table found in the Issues and Options consultation document. This will cover any issues regarding the availability of facilities such as Primary and Secondary Education, GP provision, Allotment provision and community buildings. Any issues regarding the availability of resources such as water would be subject to discussions with utility providers through DtC to determine how these issues could be resolved.
2. Northchurch Parish Council believe that the sites being promoted are at risk of flooding.	The Council acknowledge these comments. The sites that have been promoted with the Schedule of Site Appraisals (October, 2017) were promoted as part of
3. Issues raised by a number of respondents about water including the protection of chalk streams, the availability of water as a resource and the increased risk of flooding from development.	Noted: these interlinked issues will be informed by the SFRA, Water Study, HRA and SA/SEA.

Question Number 27	
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YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
4. Concern about the loss of land including Green Belt, Chilterns Area of Outstanding Natural Beauty and agricultural land. How these areas need to be protected for example for local food production.	Noted: The overall sustainability of the plan will be assessed through the SA/SEA. Specific impacts will be assessed through the HRA, LVIA for specific sites. The overall policy framework will seek to strike a balance between development and protection of natural resources.
5. Grove Fields Residents Association as well as other residents highlight that some of the sites promoted have flooded in the past and this information has not been updated from before	Noted: flood risk is addressed through the SFRA and will also be addressed through the Site Assessment Study. Individual sites with potential flood risk will be subject to further SFRA work.
6. Support for higher density and better quality (environmental) development to help protect the natural environment	Noted: these comments will be taken into account in developing the plan policies and allocations.
7. Although residents support the proposals there is concern that these will not be followed through with the scale of development proposed	Noted: one of the purposes of the plan is to give greater certainty about the scale and impact of development and support appropriate management of that development.
8. Respondents raise concerns about the impact of neighbouring authorities and their proposals on the Borough.	Noted; the cumulative impacts of developments, including those beyond the borough boundary will be addressed through the SA/SEA and DtC discussions.
9. Response that the development of specific sites would go against these policies and that the rural economy needs to be protected (agricultural land)	Noted; any proposed allocations of sites for development will be balanced against the need to protect natural resources, prevent pollution and control flood risk

Question Number 27	
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YES	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
10. Responses argue that there should be some rewording of paragraph 8.3.11 that would allow developers to contest that in some sites the sustainability benefits outweigh the flood risk	Noted: there will inevitably be the weighing and mitigation of competing interests. Flood risk could be considered in such a manner but this should be done on a site by site basis.

Question Number 27

Question Text: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **Tring Town Council** raise concerns about the increased risk of flooding from new developments and the need for extra drainage

The Council acknowledge these comments; any proposed sites would be subject to further consultation with stakeholders including the Environment Agency. This would help us to assess whether there would be any increased flooding.

Similarly, the Council is currently reviewing its SFRA and will update this in our evidence base in the near future. Should any identified need for improved drainage infrastructure be found this would be discussed with the relevant providers.

2. **Berkhamsted Town Council and Berkhamsted Residents Action Group** disagree with the approach proposed, as it would result in the loss of Green Belt and agricultural land. Also concerned that this will have other negative effects including flooding (and the SFRA), the loss of woodland and the impacts development would also have on pollution and AQMAs

The Council acknowledge these comments. Our Green Belt review served as a basis to identify sites that could be released from the Green Belt and will be subject to further assessment. Due to the many land constraints within the Borough it will be necessary to release some Green Belt land, if this land were also used for agricultural purposes the Council would aim to offset this were possible.

Issues regarding pollution, flooding, and woodland will all be considered through consultation with the relevant bodies including Hertfordshire County Council, Environment Agency and Natural England.

Question Number 27	
Question Text: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
3. Markyate Parish Council concerned that the proposal of a school and care home in their current locations would worsen traffic pollution. That development would worsen surface water runoff, increase the risk of flooding and pollute the River Ver.	<p>The Council acknowledge these comments the proposals in questions would still be subject to consultation with the relevant bodies and the wider community to determine where best to allocate these facilities.</p> <p>The Council understands the concerns raised regarding the river Ver and the effects of pollution. The chalk streams are identified as important assets for the Borough and so these will be protected. Development that would negatively impact on chalk streams would be prevented until it could be proven that these impacts had been resolved.</p>
4. Public Health Service recommend that there should be a specific air quality policy to mitigate air quality issues near major transport links, and that facilities should be located in areas where air quality is good.	<p>The Council acknowledges this comment, the Council review air quality across the Borough and administer Air Quality Management Areas in areas where this exceeds air quality standards. These areas are monitored and work from Hertfordshire County Council and Dacorum will help to address this problem and reduce pollution levels.</p> <p>Facilities would preferably be located in areas where air quality is better, however in circumstances where this would not be possible consultation with the developer and other relevant bodies would be considered.</p>

Question Number 27	
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NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. Chilterns Conservation Board state that there should be greater consideration of chalk streams, and that water availability should be considered.	The Council acknowledge this and the importance of chalk streams as international assets and will be protected as part of our Landscape Character Assessment. The availability of resources is something that will be considered and discussed through our duty to cooperate with utility providers and with other relevant stakeholders.
6. Hertfordshire County Council address several different points within their representation. They suggest that the protection of natural resources should include a list of what these resources are. They also raise specific concerns about the protection of chalk streams and the effects of water abstraction on groundwater and on Sites of Special Scientific Interest. Sites that impact on these cannot be considered sustainable until these issues can be resolved.	Noted; these comments will be taken into account in developing the Local Plan policies and allocations. Impacts on chalk streams and other designated sites, including SSSI will be addressed through the SA/SEA, HRA (and AA if required) as well as assessment of the potential for impacts arising from any development on specific sites allocated for development.

Question Number 27	
Question Text: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
7. Many respondents from different locations across the Borough raise concerns about the increased flood risk from development and that this will cause further soil erosion and displacement.	The Council acknowledges these concerns, as part of the site allocation process, studies would be conducted to determine the flood risk of each site through consultation with the Environment Agency as our statutory consultee. This would consider the issue of not only flooding within the development but also consider the potential of increased surface water run-off and in cases where there is a risk of this then this will be discussed with the developer to amend any plans to mitigate this risk.
8. Increased development in already busy and congested areas will lead to worse pollution levels. There was also concern of how this would impact on areas that are already Air Quality Management Areas	The Council acknowledges these concerns. Where there is, already issues of congestion the Council will consult with Hertfordshire County Council as the highways authority for the Borough, in how to address these issues. Development that would potentially worsen Air Quality Management Areas would be not be promoted. Unless these impacts could be removed. This would also require consultation with Hertfordshire County Council and the developer.

Question Number 27	
Question Text: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?	
NO	
<i>If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
9. Respondents raise concerns about pollution (noise and fumes) from the redirection of Luton Airport.	The Council acknowledges these comments. While the Council can consult with Luton Airport regarding these issues it is unlikely that any agreement will be come to. Ultimately, this decision would be the duty of air traffic control and the aviation authority.
10. Comments regarding water abstraction in the river Bulbourne and river Gade. The effects of river pollution and that a specific policy should be produced based on the objectives set out in the Sustainability Appraisal Scoping Report.	The Council acknowledges these comments. The Council could consult with utility providers that operate in the Borough to discuss the issues of water abstraction, and whether this has any effect on the ecology. This would likely require consultation with other relevant bodies including the Environment Agency and Natural England as our statutory consultees on this matter and whether there would be a need for further action or assessments to be taken.
11. Shendish site is a Ground Water Protection Zone.	The Council acknowledges this and will review any and all matters that relate to potential sites through consultation with the relevant bodies.

Question Number 28	
Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies	
YES	
<i>If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Markyate Parish Council agree with these issues, but are concerned about the amount of drinking water available for the proposed developments	Noted: water supply will be discussed with the providers under DtC; however developers have a right to connect and development cannot normally be resisted on the grounds of inadequate water supply.
2. Tring Town Council and Northchurch Parish Council believe that development will only meet the minimum standards of sustainability	Noted: this will be taken into account and overall sustainability of the plan will be reviewed through the SA/SEA
3. Grove Fields Resident Association support the policy and renewable energy proposals, but are concerned that the inclusion of development viability comments it would discourage high efficiency development.	Noted: viability of the plan as a whole and individual sites will be addressed through a comprehensive review to ensure that highest practicable sustainability standards are delivered. The methodology will be based on the latest policy and guidance set out in the NPPF and PPG. This will be taken into account and overall sustainability of the plan will be reviewed through the SA/SEA
4. Support for the policies included but do not believe that these can be supported because the sites are in unsustainable locations.	Noted: this will be addressed through site selection informed by the evidence base including the LHNA and the overall sustainability of the plan and sustainability of individual sites will be reviewed through the SA/SEA

Question Number 28

Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies

YES

If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

5. These plans should include more on the provision of Electric Vehicle infrastructure

Noted: this will be addressed as part of the overall development strategy and is likely to be addressed in both strategic and detailed policies.

This will be taken into account and overall sustainability of the plan will be reviewed through the SA/SEA

6. Concern that this will have an impact on woodland and that there should be more tree planting

This will be taken into account and overall sustainability of the plan will be reviewed through the SA/SEA. Policies to safeguard and enhance biodiversity will also be considered in accordance with the principles contained in the NPPF.

7. Believe that the Council should encourage environmental credentials above Building Regulations standards

Noted; such an approach is not supported by Government advice and policy. However, the NPPF requires the plan to deliver sustainable development which encompasses a very broad range of issues and opportunities that will be taken into account in developing the Local Plan,

This will be taken into account and overall sustainability of the plan will be reviewed through the SA/SEA.

Question Number 28

Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies

YES

If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.

Key points raised in representations

8. **Berkhamsted Residents Action Group** believe that development along the A41 will increase congestion and pollution in Berkhamsted Town Centre, and that the topography of the area does not encourage active travel.

Officer response

These issues will be addressed and explored through the HRA, COMET modelling and SA/SEA which will inform plan preparation and any mitigation measures.

The matter regarding topography is noted; however, there are non-car based travel options compatible with such a situation and these will be reviewed as part of the plan preparation.

Question Number 28	
Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?	
NO	
<i>If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Chilterns Conservation Board argue about the importance of the natural environment as a carbon store. They also suggest that sustainable farming and land management practices should be encouraged	Noted; the overall impact of the Plan's proposals on the environment (including carbon emissions) will be addressed and reviewed through the SA/SEA. The Local Plan cannot directly set policies regarding farming and land management but can set a wider framework around sustainability and sustainable development.
2. Berkhamsted Town Council and Berkhamsted Residents Action Group suggest that development on the Green Belt along the A41 would impact on Berkhamsted Town Centre and increase traffic congestion and therefore pollution. The town does not encourage active travel due to the topography of the area. They also raise concerns about the threat to woodland, that there is no potential for district heating and that there should be a policy about building regulations.	These issues will be addressed and explored through the HRA, COMET modelling and SA/SEA which will inform plan preparation and any mitigation measures. The matter regarding topography is noted; however, there are non-car based travel options compatible with such a situation and these will be reviewed as part of the plan preparation.
3. Aylesbury Vale District Council believe that the SFRA should be reviewed to look at the potential future flood risk with climate change, as this was needed to satisfy the Environment Agency.	A SFRA part 1 and part 2 is being carried out as part of the Local Plan Evidence base to support the development of policies and allocation of sites.

Question Number 28

Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?

NO

If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.

Key points raised in representations	Officer response
4. Historic England make policy suggestions regarding the impact of energy efficiency equipment in conversation areas historic buildings and historic landscapes.	Noted; these comments will be taken into account and the overall impact of the Plan's proposals on the environment (including carbon emissions) will be addressed and reviewed through the SA/SEA.
5. Hertfordshire County Council make several different comments including that there is no mention of transport measures that would have an effect on climate change. That there should be policy for development to include a Site Waste Management Plan and that there should be greater reference to land management approaches to climate change.	Noted; these comments will be taken into account and the overall impact of the Plan's proposals on the environment (including carbon emissions) and climate change will be addressed and reviewed through the SA/SEA.
6. Respondents make reference to adding additional requirements for planning permission such as the inclusion of BREEAM, Code for Sustainable Homes and energy hierarchy that would help to make homes carbon neutral.	Noted; such an approach is not supported by Government advice and policy. However, the NPPF requires the plan to deliver sustainable development which encompasses a very broad range of issues and opportunities that will be taken into account in developing the Local Plan, This will be taken into account and overall sustainability of the plan will be reviewed through the SA/SEA.

Question Number 28	
Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?	
NO	
<i>If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
7. Several respondents claim that the removal of Green Belt/ farmland/ woodland would have a negative impact on climate change mitigation	Noted: this will be taken into account, however, management of climate change impacts is not one of the issues identified as a purpose of the Green Belt in the NPPF. The thrust of the comments will be taken into account and the overall impact of the Plan's proposals on the environment (including carbon emissions) and climate change will be addressed and reviewed through the SA/SEA.
8. Respondents believe that the sites chosen will worsen climate change and that development should be focused in large settlements and industrial areas.	Noted; these comments will be taken into account and the overall impact of the Plan's proposals on the environment (including carbon emissions) and climate change will be addressed and reviewed through the SA/SEA.
9. Canals and River Trust believe that these can be used for energy production and potentially help with the heating and cooling of new developments.	Noted; these comments will be taken into account and potential opportunities explored, the overall impact of the Plan's proposals on the environment (including carbon emissions) and climate change will be addressed and reviewed through the SA/SEA.
10. Respondents mention that the practicality of district heating is limited and that policy should not encourage it as it could limit development	Noted: district heating is an established technology and can offer significant opportunities to impact positively on climate change. The points raised are considered to be more relevant to the promotion of high quality and future proofed design principles than a reason to discount district heating solutions.

Question Number 28

Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies?

NO

If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

11. Respondents raise that there should be a scheme implemented to improve the efficiency of the existing housing stock.

Noted; however, policies in the Plan cannot require improvements to existing buildings; however, the policy framework could include criteria based policy that support any proposals to increase efficiency where such works require planning permission.

12. Kings Langley Community Benefit Society would like to see a pilot study of Passivhaus standard homes on the KL-h2 Rectory Farm site.

Noted: this can be considered should the site be proposed in whole, or in part, for allocation for housing development.

13. Concern that by increasing the environmental standards of development this will raise house prices by offsetting to the home owner and would have an adverse effect on affordability.

Noted; the impacts of all potential policy on development and sale costs will be addressed through the plan wide and site specific Viability Assessment Work.

Question Number 29	
Question Text: Do you agree that we have covered all relevant issues relating to physical infrastructure?	
YES	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence</i>	
Key points raised in representations	Officer response
1. Sport England keenly support the inclusion of sports facilities in the allocation of sites for green infrastructure.	DBC acknowledges the support from Sport England.
2. Transport for London are pleased that they have been consulted on Dacorum's Local Plan and outline the primary issue with strategic transport infrastructure is the capacity of the West Coast Mainline Railway and the associated impact of HS2.	Noted: these comments will be taken into account in the development of the plan and informed by the Local Plan Evidence Base.
3. The Chilterns Society state that the impact of the additional infrastructure provision on the Green Belt, particularly the Chilterns AONB, must be duly considered within the new environmental policies to ensure a sustainable approach to growth is adopted.	Noted: the potential for a policy within local plan for AONB protection will be considered. Specific policy provision for relevant issues such as biodiversity will be considered. The overall sustainability of the plan will be considered through the SA/SEA
4. Traffic flows in Dacorum, notably Kings Langley, should be improved.	The traffic impacts arising from proposed new development (both individual and cumulative) will be considered through the COMET modelling and site specific traffic modelling where appropriate. The overall sustainability of the plan will be considered through the SA/SEA

Question Number 29

Question Text: Do you agree that we have covered all relevant issues relating to physical infrastructure?

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence

Key Points Raised In Representations

1. **The Chilterns Countryside Group** view that infrastructure improvements should not be dependent on the release of Green Belt land. Moreover, the granting of planning permission via the developer contributions mechanism will not guarantee the delivery of sufficient infrastructure in line with the extensive population and housing growth planned for Dacorum in the next Local Plan Period.

Officer Response

DBC acknowledges the concerns raised by the Chilterns Countryside Group.

Any release of Green Belt Land for development will be informed by the current Green Belt Study and any subsequent further detailed review.

The need, or otherwise, for Green Belt release will be informed by the Local Plan Evidence Base including the LHNA and Urban Capacity Study.

The requirement for infrastructure will be addressed through the IDP and this will be informed by the Plan wide and site specific viability assessment.

<p>2. Historic England suggest that upgrades to physical infrastructure need to be meticulously and sustainably planned to avoid harm to heritage assets e.g. sympathetically designed to suit the environment in both size and style – this should be incorporated into any DBC policy on telecommunications. Whilst stating the importance of telecommunications infrastructure (high speed broadband) for sustainable growth in Dacorum, Historic England strongly assert that the location of the digital infrastructure should not negatively impact the historic and public landscapes of the Borough.</p>	<p>DBC acknowledges the concerns raised by Historic England.</p> <p>These issues will be addressed in the development of the Plan and engagement and consultation with Historic England through the statutory consultation process and dialogue through DtC.</p> <p>The impact of development proposals on heritage assets arising from proposed site allocations will be addressed through the Site Assessment Study and subsequent detailed site specific work.</p> <p>Existing criteria based policies to safeguard heritage assets and their settings will be reviewed and revised or replaced as appropriate.</p>
<p>3. Hertfordshire County Council state that it is essential for Dacorum to work continuously and jointly with neighbouring local authorities in the South West Hertfordshire area to address the cumulative impact of development. Strategic and sustainable transport infrastructure schemes promoting behavioural change in transport usage should be incorporated into local plan policies. HCC state that the 'Requirements for Local Plans – August 2016' document and the COMET transport model should be consulted, in order to produce a transport strategy for mitigating the impact of housing growth in Dacorum. Moreover, it is necessary that the Local Plan recognises the travel patterns between Dacorum and London in its policies and site allocations. Consideration of the proximity of site allocations to major public transport interchanges, such as the A414/M1 Junction 8 and improving connections to existing employment areas (Maylands) should also be taken into account.</p>	<p>Noted; the Local Plan will be informed by the evidence base which will include the COMET modelling output along with the other wider and site specific policies.</p> <p>The overall impact of travel patterns and demand will be reviewed as part of the SA/SEA.</p> <p>The Council has embarked on a full programme of DtC meetings to comply with the minimum statutory requirements. The programme includes meetings with all SW Herts partners and other LPA at both district/borough level as well as County and Unitary bodies.</p> <p>The DtC meetings also include Highways England to address potential impacts on the motorway network and wider primary road network.</p>

<p>4. Buckinghamshire County Council and Pitstone Parish Council both suggest that issues with Tring Station (namely the capacity of the car park) need to be addressed by the promotion of sustainable transport options and joint working with neighbouring authorities; particularly between BCC and Dacorum. BCC also raise concerns over the impact of traffic across the Dacorum/Buckinghamshire border and would like to see the transport modelling evidence supporting the Local Plan. However, BCC supports the Grand Union Canal Towpath renovation project and proposes that developments adjacent to the canal should secure s106 funding.</p>	<p>DBC acknowledges the concerns raised by Buckinghamshire County Council and Pitstone Parish Council and these will be taken into account in developing the Local Plan.</p> <p>DBC will be working jointly with HCC, BCC and neighbouring local authorities through DtC and other formal meetings and discussions to ensure the appropriate delivery of infrastructure.</p>
<p>5. Central Bedfordshire Council support continual engagement with Dacorum concerning cross-boundary infrastructure projects, ensuring that Central Bedfordshire residents are not detrimentally impacted by housing development in Dacorum. Moreover, CBC state that growth delivered in Dacorum must be accompanied by an appropriate level of infrastructure.</p>	<p>DBC acknowledges the concerns raised by Central Bedfordshire Council. DBC will be working with CBC through the DtC process.</p>
<p>6. Welwyn Hatfield Borough Council suggest that capacity issues at Maple Lodge Sewage Treatment Works needs to be addressed to accommodate the prospective cross-boundary growth within its catchment; taking into consideration the Thames Water Utilities consultation response to the WHBC Local Plan Consultation in 2015. Furthermore, WHBC would like to be provided with updates on Dacorum's Stage 2 study.</p>	<p>DBC will engage with WHBC through the DtC which will provide an opportunity to discuss the matters raised.</p> <p>DBC will also continue DtC dialogue and discussions around the IDP with the various utility providers to inform the Local Plan development and the Local Plan evidence base.</p>

<p>7. Little Gaddesden Parish Council suggest that the definition of 'Physical Infrastructure' in paragraph 9.0.3 1) should include Telecoms. Additionally, infrastructure improvements need to be made in Dacorum to increase the capacity and frequency of the bus service from Little Gaddesden to Hemel Hempstead/Berkhamsted.</p>	<p>DBC acknowledges the concerns raised by Little Gaddesden Parish Council. The points made will be taken into account in developing the Local Plan.</p> <p>Transport infrastructure will be addressed through the IDP along with other infrastructure provision/needs.</p> <p>Telecoms will be addressed through strategic and specific policies. The provision of the highest speed/capacity connectivity will be addressed through the plan policies.</p>
<p>8. Flaunden Parish Council suggest that significant investment in transport infrastructure and station car parking facilities in Kings Langley and Bovingdon is needed to support prospective growth in Dacorum. The over capacitated road networks and rail station car parking facilities compromise the village character, transport infrastructure and employment opportunities in Flaunden.</p>	<p>DBC acknowledges the concerns raised by Flaunden Parish Council.</p> <p>Transport infrastructure will be addressed through the IDP along with other infrastructure provision/needs.</p> <p>The Local Plan will be informed by the evidence base which will include the COMET modelling output along with the other wider and site specific policies.</p> <p>The Hertfordshire County Council transport plans such as LTP4 will also be taken fully into account in developing the plan and this will be supplemented through the DtC process.</p>

<p>9. Tring Rural Parish Council state that Dacorum's sewage treatment facilities are at capacity and need to be expanded to accommodate the additional housing growth in the borough. Moreover, transport and telecommunications infrastructure require considerable improvement to reduce traffic congestion and increase broadband speed in rural communities.</p>	<p>DBC acknowledges the concerns raised by Tring Rural Parish Council.</p> <p>Infrastructure needs will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers.</p> <p>The overall sustainability of the Local Plan will be addressed through SA/SEA and the deliverability will be demonstrated through the wider evidence based which will be tested at the EIP.</p>
<p>10. Markyate Parish Council suggest that Government action is needed to increase the availability and storage of drinking water in Dacorum and South East England.</p>	<p>DBC acknowledges the concerns raised by Markyate Parish Council. The Local Plan is not the vehicle for addressing or changing Government Policy.</p> <p>Infrastructure needs (including water supply) will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers.</p>
<p>11. Northchurch Parish Council raise concerns over the present capacity of both water and sewage treatment facilities and electricity provision in Dacorum.</p>	<p>DBC acknowledges the concerns raised by Northchurch Parish Council.</p> <p>Infrastructure needs (including water supply, sewerage capacity and electricity supply) will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers.</p>

<p>12. Berkhamsted Town Council are in agreement with the transport infrastructure principles outlined in paragraph 9.1.1. However, BTC suggest that large scale housing developments do not guarantee the delivery of suitable infrastructure and there are significant issues in Site Appraisal. Additional development will worsen the existing infrastructure already at capacity and detrimentally impact Berkhamsted town centre. Moreover, infrastructure improvements related to specific development sites should not count towards the infrastructure provision for the borough as a whole – significant and comprehensive upgrades to physical infrastructure are required.</p>	<p>DBC acknowledges the concerns raised by Berkhamsted Town Council.</p> <p>Infrastructure needs will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers, HCC and Highways England and other providers.</p> <p>The overall sustainability of the plan including impact of travel patterns and demand will be reviewed as part of the SA/SEA.</p>
<p>13. Tring Town Council seek assurance that the necessary social, physical and green infrastructure will be provided and financed. Furthermore, the cumulative impact of housing growth should be taken into account when determining the infrastructure provision for a development; ensuring that the infrastructure can sustainably support the future growth in the borough. While, TTC suggest that digital infrastructure (broadband) should be considered as an essential item of infrastructure and the issue of train station accessibility should be incorporated into the Plan and planning process.</p>	<p>DBC acknowledges the concerns raised by Tring Town Council.</p> <p>Infrastructure needs, including transport, will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers, HCC and Highways England and other providers.</p> <p>The overall sustainability of the plan including impact of travel patterns and demand will be reviewed as part of the SA/SEA.</p> <p>Telecoms will be addressed through strategic and specific policies. The provision of the highest speed/capacity connectivity will be addressed through the plan policies.</p>

<p>14. Berkhamsted Residents Action Group share the same views as Berkhamsted Town Council, but further stress the problems with water supply and the insufficiency of the existing physical infrastructure, specifically concerning the aquifer capacity at the River Bulbourne and the River Gade. Additional housing development should not be proposed until a sustainable water supply in Dacorum is guaranteed.</p>	<p>DBC acknowledges the concerns raised by Berkhamsted Residents Action Group.</p> <p>Water supply and sewage treatment capacity will be discussed with the providers under DtC; however developers have a right to connect and development cannot normally be resisted on the grounds of inadequate water supply or sewerage capacity.</p> <p>The overall sustainability of the plan including impact of travel patterns and demand will be reviewed as part of the SA/SEA.</p>
<p>15. Grove Fields Residents Association view that this question cannot be satisfactorily answered at present due to outstanding infrastructure reports that require consideration. However, GFRA raises concern over the lack of forward planning for the impact of current and future growth on physical infrastructure in Tring and the rest of the Borough.</p>	<p>DBC acknowledges the concerns raised by Grove Fields Residents Association.</p> <p>Infrastructure needs, including transport, will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers, HCC and Highways England and other providers.</p> <p>The overall sustainability of the plan including impact of travel patterns and demand will be reviewed as part of the SA/SEA.</p>

Question Number 30

Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

<p>1. Concerns with the provision of healthcare (including GP and dentists) and Hospitals within the Borough. Respondents mention the issues of getting to Watford hospital and how sites should be protected for future healthcare possibilities.</p> <p>There has also been concern that the housing figures used to assess needs are based on outdated forecast figures, and how will this healthcare infrastructure will cope in areas where there is believed to be an infrastructure deficit.</p>	<p>The Council recognise these comments; healthcare provision within the Borough is provided by public bodies. This will require further consultation with the relevant bodies to establish their proposals for Dacorum and the West Hertfordshire area, and will give us the opportunity to highlight to service providers the concerns that have been raised during the Issues and Options study. These discussions will help to inform the new Local Plan going forward.</p> <p>There is currently planned provision for a new hospital on the existing hospital site in proposal MU/2 in the Site Allocations DPD.</p> <p>The allocation of social infrastructure such as GP and dental practices is also a joint decision so more consultation with relevant bodies and further studies regarding the availability and resource requirements to produce these will be needed. The Infrastructure needs for different scales of development (Issues and Options consultation, page 82) is our standardised measure for infrastructure provision, however in some instances it may be advisable to amend this where there is evidence of a clear deficiency in such services.</p> <p>The existing Infrastructure Delivery Plan (InDP, July 2017) highlights how many of the infrastructure concerns raised within this question will be responded to including provisions for GP Surgeries.</p> <p>How and where these services should be provided will be subject to further investigation of the identified sites to see which sites provide the best options should the need for additional infrastructure be deemed necessary.</p>
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Question Number 30	
Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
2. Concerns from residents and Tring Rural Parish Council of primary school places within the Borough with some respondents claiming that their children have been unable to attend local schools.	<p>The provision of schools is a joint discussion between Dacorum Borough Council, and Hertfordshire County Council. The method used (Infrastructure needs for different scales of development, Issues and Options page 82) helps to assess the need for schooling with the forecast demand and site sizes. In some instances it maybe more acceptable to relocate existing schools into new sites such as where its current location is not accessible or it is in an unsafe location for users. In these circumstances there will be discussion with developers about the potential of replacing this existing infrastructure.</p> <p>In cases where there is a high level of development taking place Hertfordshire County Council will carry out their own assessment of the impact on primary schools. More information regarding the planned provision of primary schools can be found in the Infrastructure Delivery Plan (InDP, July 2017) on a settlement by settlement basis.</p>
3. Central Bedfordshire Council do not want development in Dacorum to impact on social infrastructure within their district. The need for infrastructure provision within Dacorum to support proposed growth.	The Council acknowledge these comments. As part of the Local Plan process the Council have a duty to co-operate with its neighbouring authorities to address and discuss concerns about development. The Council will also consult with service providers regarding the levels of infrastructure that will be required

Question Number 30	
Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
4. Berkhamsted Town Councils, Northchurch Parish Council and residents associations raise concerns of secondary school provision in the area, specifically the idea of a new secondary school for Berkhamsted and Tring, and that plans to extend Ashlyns School are impractical.	The Council acknowledge these comments, the possibilities regarding secondary school provisions within the Tring and Berkhamsted areas are still under investigation. This will require further studies and consultation with Hertfordshire County Council as the education planning authority for the Borough and with the wider community to address this issue. In some cases it may also be necessary to consult neighbouring authorities with regard to school provision and whether it is possible to have a joint agreement that better suits both authorities. This is known as a duty to cooperate and will be something that Dacorum and the two County Councils would action should there be need and if benefit to both authorities can be found.
5. BRAG and other respondents refer to the cultural/ arts infrastructure within the Borough.	The Council acknowledge these comments; we are currently undertaking a leisure needs study which will help to inform whether any provision of that nature is required. This piece of work will provide evidence for the new Local Plan, which will help to deliver such facilities should there be an identified need.

Question Number 30	
Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
6. BRAG and other respondents mention of changing needs in the community specifically healthcare needs including mental health and Dementia/ Alzheimer's.	The Council acknowledge these comments and understand that these are becoming more prominent issues within our community. Provision for services like these are be provided through an agreement with Dacorum Council and service providers such as NHS and Public Health England which will be assessed with studies regarding the matter. Should there be an identified need for such facilities this will be introduced into the Local Plan to ensure that these requirements are met.
7. Concern from Sport England and other respondents about other facilities necessary for communities are to be provided including sports, and leisure facilities within the settlements.	Facilities that are not covered by the Infrastructure needs for different scales of development will be assessed through different studies to identify any need. We currently have some work being carried out including an open Space and Sports Pitches Study which will determine whether there is any need to provide new or replace existing infrastructure, which covers both, indoor and outdoor provisions.
8. Concerns about the displacement of existing social infrastructure should development come forward. One specific representation was the Sunnyside Rural Trust, which provides employment for disabled people.	The Council acknowledges this, and the intention is that these services will be retained. However, it is not possible to say with certainty that these facilities will not be displaced. Should development come forward that would displace these services the Council will try and replace these in a like for like environment.

Question Number 30	
Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
9. Representations regarding the young and elderly and the necessary social infrastructure to support them.	The Council acknowledge these comments, the provision of infrastructure of all kinds will be addressed through the evidence base and in particular through the IDP
10. Concern from Berkhamsted residents and Berkhamsted Town Council regarding plans to introduce community centres within the new developments like Hemel Hempstead new town; and that this will be detrimental to Berkhamsted town centre.	The Council acknowledge these comments. The proposal to introduce community centres such as those in Hemel Hempstead is to provide for new residents in a way that is not detrimental to the existing. The National Planning Policy Framework actively encourages authorities to 'Ensure the vitality of town centres' so any services provided within new developments would be carefully considered, and would be aimed at meeting social needs such as childcare provisions rather than taking services away from the town centre.
11. Pitstone Parish Council and Buckinghamshire County Council identify the need for cross boundary cooperation to provide school places in the area	Noted; this will be pursued through DtC discussions with HCC as the Education Authority. Discussions will also be held under DtC with other adjoining LPA and LEA to ensure that education provision is addressed comprehensively and any cross border issues are addressed.
12. West Herts Hospital Trust mention the need to be further consulted to identify sites for healthcare provision within the new Local Plan.	Noted: this will be addressed through the statutory consultation process in line with the Adopted SCI. Further discussion will take place as part of the IDP preparation and through other relevant fora.

Question Number 30	
Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
13. Herts Valley Clinical Commissioning Group question how investment for healthcare will be found and whether this can be done through developer contributions	Noted: this will be addressed through the IDP preparation and through other relevant for a including DtC meetings. Site allocations will also give consideration to the need to allocate sites and or secure funding if this is not covered under the current (or any future revised) CiL charging schedule.
14. Flaunden Parish Council, Markyate Parish Council and Tring Town Council all raise concerns of infrastructure availability that it is already at capacity. Issue that development in settlements does not deliver infrastructure.	This will be taken into account and overall sustainability of the plan will be reviewed through the SA/SEA Infrastructure needs (including water supply) will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers. Site allocations will also give consideration to the need to allocate sites and or secure funding if this is not covered under the current (or any future revised) CiL charging schedule.
15. Chilterns Conservation Board believe that this section should include more about the importance of the Chilterns AONB for mental health and wellbeing.	Noted; the extent of commentary and express policy support for mental health and wellbeing will be addressed through the development of the Local Plan.

Question Number 30		
Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?		
YES		
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>		
Key points raised in representations	Officer response	Actions to be taken
<p>1. Hertfordshire County Council Development Services raise multiple points including</p> <ul style="list-style-type: none"> • The potential relocation of emergency services if there is appropriate sites identified. • Consultation on new developments to ensure that fire prevention is adequate. • Providing opportunities for young people. • Increased provision of libraries and an approach for developer contributions to support this. • New waste site of 1ha site to be provided within the Borough and a new organic waste treatment centre within the west of the Borough. • Adult care provision • Childcare allowance, including new infrastructure to support increasing demand • School provision • Healthcare provision 	<p>Infrastructure needs (including water supply) will be addressed through the IDP and supplemented through DtC and other meetings and dialogue with the infrastructure providers.</p> <p>Site allocations will also give consideration to the need to allocate sites and or secure funding if this is not covered under the current (or any future revised) CiL charging schedule.</p> <p>Overall sustainability of the plan will be reviewed through the SA/SEA</p>	
<p>2. Little Gaddesden Parish Council and residents suggest that there needs to be more consultation with Hertfordshire County Council as the education provider to ensure that there is enough school provision for the proposed growth.</p>	<p>Noted; this will be pursued through DtC discussions with HCC as the Education Authority. Discussions will also be held under DtC with other adjoining LPA and LEA to ensure that education provision is addressed comprehensively and any cross border issues are addressed.</p>	

Question Number 30		
Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?		
YES		
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>		
Key points raised in representations	Officer response	Actions to be taken
3. Residents also make reference to the need for better healthcare provision including a better located and more accessible hospital, improved local care availability such as GPs and dentists including services for the elderly.	Noted: these points will be addressed as the plan is developed and site allocations will also give consideration to the need to allocate sites and or secure funding if this is not covered under the current (or any future revised) CiL charging schedule.	
4. Chilterns Society would like to see social infrastructure provision within major developments, so that traffic implications on the Area of Outstanding Natural Beauty are minimised.	Noted: these points will be addressed as the plan is developed and site allocations will also give consideration to the need to allocate sites and or secure funding if this is not covered under the current (or any future revised) CiL charging schedule.	
5. Ashlyns governing body reason that there is not capacity to further expand the school, but also understand that there is not demand for a further school. Where would this provision be provided?	Noted; this will be pursued through DtC discussions with HCC as the Education Authority. Discussions will also be held under DtC with other adjoining LPA and LEA to ensure that education provision is addressed comprehensively and any cross border issues are addressed.	
6. Residents claim that there is an identified need for other social infrastructure provision including, leisure and childcare as well as the need for a cultural/ arts venue in the Borough.	Noted: these points will be addressed as the plan is developed and site allocations will also give consideration to the need to allocate sites and or secure funding if this is not covered under the current (or any future revised) CiL charging schedule	

Question Number 31

Question Text: Do you think that we have covered all issues relating to green infrastructure?

YES

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. Sport England believe that sports and leisure provisions should be encouraged on all major sites. They also mention that it does not say anything about providing provisions on sites below 500 dwellings and that this would place pressure on existing facilities.	Noted: the provision of sport and leisure facilities will be addressed through the IDP, The Open Spaces and Play Space Study and individual site allocations. Consideration will be given to providing appropriate infrastructure to support all proposed developments.
2. Historic England state that green infrastructure often has historic value and helps to conserve and enhance historic assets and improve their accessibility. There should be consideration of protecting these so they continue to be beneficial	Noted; consideration will be given to the safeguarding of heritage assets through strategic and specific criteria based policies in addition to consideration through specific site allocation proposals.
3. Hertfordshire County Council Development services , property and resources believe that there is opportunities to better integrate green infrastructure with other land uses on site Tr-h5 Dunsley Farm and would require further discussion with the Local Planning Authority.	Noted: these comments will be taken into account should it be proposed to allocate the Dunsley Farm site in whole or part for development.
4. Residents want to see the protection of green space and green corridors	Noted; this will be addressed through strategic and specific policies addressing a range of issues including: the safeguarding of heritage assets, safeguarding and enhancing biodiversity, safeguarding landscape and urban character and mobility.

Question Number 31

Question Text: Do you think that we have covered all issues relating to green infrastructure?

YES

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

5. Residents suggest that they want to see green infrastructure that has ecological value. The provision of green play space will not support wildlife.

Noted; this will be addressed through strategic and specific policies addressing a range of issues including: the safeguarding of heritage assets, safeguarding and enhancing biodiversity, safeguarding landscape and urban character and mobility. Open space can fulfil a number of functions. The provision of play space is supported by the NPPF and will be balanced against the other uses of open space. The promotion of high quality design in all aspects of development will ensure that the various interests and functions of open space are balanced.

6. The importance of waterways in providing an important wildlife habitats

Noted: this will be addressed through strategic and specific criteria based policy as well as through site allocations.

7. Consideration of the residual impacts of development green infrastructure should be used to support this.

Noted: this will be taken into account in development the Local Plan.

Overall sustainability of the plan will be reviewed through the SA/SEA

Question Number 31	
Question Text: Do you think that we have covered all issues relating to green infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Chilterns Conservation Board believe there should be better connections from public rights of way into AONB. Other representations made regard the protection of the AONB from development.	Noted; this will be addressed through specific criteria based policies and through site allocations where opportunities to connect into and enhance connections to the AONB. The AONB and its setting will be carefully considered as part of strategic and specific policy development along with site allocation and any associated master planning. Where appropriate the potential impacts of development will be addressed through LVIA.
2. Buckinghamshire County Council and Watford Borough Council believe that there has been limited consideration of other types of green and blue infrastructure and that these should be connected, cross boundary work to improve this.	Noted; this will be addressed as the plan id developed and picked up through DtC discussions. The overall sustainability of the plan will be addressed through the SA/SES work.
3. Berkhamsted Town Council and Berkhamsted Residents Action Group state that Berkhamsted already has a deficit open space based on National playing fields standards and that these should be accessible without the car. They say that the green belt land is fulfilling that purpose. Other respondents from Berkhamsted ask for Haslam fields to provide playing fields and wildlife areas.	Noted; the adequacy of existing facilities and the need to provide additional open space to support new development will be informed by the local plan evidence base including the Open space Study. Recreation and open space use is identified in the NPPF as being appropriate in the Green Belt.
4. Markyate Parish Council believe that promoting large scale growth will help with infrastructure delivery	Noted; the provision of infrastructure will be addressed through the IDP.

Question Number 31	
Question Text: Do you think that we have covered all issues relating to green infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. Tring Town Council due to their location surrounded by the Chilterns Area of Outstanding Natural Beauty and that it needs to be protected. Plans should only be made once there is up-to-date evidence	The proximity of the CAONB will be considered as part of the site assessment work. The impacts of any potential site allocations in proximity to the CAONB will be subject to LVIA. The part 1 and 2 Green Belt studies will also be taken into account in assessing sites in proximity to Tring.
6. Central Bedfordshire Council are concerned that development in Dacorum would have a detrimental impact on other authority's infrastructure. Infrastructure should be provided by Dacorum for all of the proposed development in the Borough and should engage with neighbouring authorities	The need for new infrastructure will be addressed through the IDP which will take account of any potential cross border issues; however, it is expected that new development will deliver essential supporting infrastructure. DBC will engage with neighbouring authorities, including CBC, through the DtC process.
7. Public Health Service believe that there should be a strengthened policy on protecting green infrastructure by acknowledging its importance on people's health and promoting active travel	Noted; this will be addressed through detailed policy development and/or specific allocation or designation of sites.
8. Hertfordshire County Council this should include a strategic green infrastructure policy based on the Hertfordshire green infrastructure plan, there should also be reference to the historic environment, and Accessible Natural Greenspace measure.	Noted; this will be addressed through detailed policy development and/or specific allocation or designation of sites.

Question Number 31	
Question Text: Do you think that we have covered all issues relating to green infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
9. Respondents claim that there is a green infrastructure deficit in Kings Langley, and that these are important for education and wildlife	Noted; the adequacy of existing facilities and the need to provide additional open space to support new development will be informed by the local plan evidence base including the Open space Study and IDP.
10. Grove Fields Residents Association believe that there has not been sufficient justification to release Green Belt land and should until such a time be protected under the same approach used for Green Infrastructure.	The starting point for assessing the importance and protection of Green Belt Land is the NPPF and the Local Plan must be in conformity with this policy/guidance. No decisions have been taken at this time to release any further Green Belt land for development. The site assessment study will also address the take the Green Belt status of land into account. The part 1 and 2 Green Belt studies will also be taken into account in assessing sites in proximity to Tring.
11. Many respondents feel that the green infrastructure needs have not been given enough detail about what needs protection such as trees and woodland (Woodland Access Standard WAsT), hedgerows, blue infrastructure. That biodiversity needs to be protected so there is no net loss and that it is inappropriate to offset this as land around serves functions for wildlife and agricultural use.	The overall sustainability of the plan, including impact on biodiversity will be addressed through the SA/SEA process supplemented by the HRA work for specifically designated sites. The protection and/or enhancement of biodiversity will be addressed through specific policy and individual site allocations.

Question Number 31	
Question Text: Do you think that we have covered all issues relating to green infrastructure?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
12. Kings Langley & District Residents Association and other respondents recognise a need to retain green infrastructure for settlement separation and character	<p>The protection and/or enhancement of biodiversity will be addressed through specific policy and individual site allocations.</p> <p>This is one of the purposes of the Green Belt and such sites that meet this criteria of the Green Belt have been assessed through the Green Belt reviews and this will be taken into account in developing the plan and in particular any identification of any potential development sites.</p>
13. Tring residents discuss that they are in a deficit of sports facilities. Tring Sports Forum have requested a meeting to discuss meeting these needs.	<p>Noted; the adequacy of existing facilities and the need to provide additional open space to support new development will be informed by the local plan evidence base including the Open space Study.</p> <p>Meetings will be held under the DtC process and through consultation with elected representatives such as Town and Parish Councils.</p>

Question Number 32

- **Question Text: Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?**

YES

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. Use CIL and s106 Agreements to fund works to cover extra traffic on towpaths and reservoir upgrades necessitated by nearby new development

These are used as appropriate in consultation with the Canal and Rivers Trust

2. Use CIL and s106 Agreements to provide infrastructure to deal with demands of new development.

These are used as appropriate in consultation with infrastructure providers.

3. Explore options for seeking central Government support for the delivery of infrastructure, and development more generally. For example, the Housing Infrastructure Fund

The Council actively seeks funding opportunities to assist with the delivery of infrastructure. Significant amounts of infrastructure are led and funded by other organisations, for example County for transport, roads and education for which they receive central government funding. More recently, the council is applying for funding from central government as part of the Local Full Fibre Network programme

4. Shendish stated to be part of Kings Langley and Kings Langley should be covered in its own right and not as part of Hemel Hempstead

Noted; infrastructure provision will be covered through the IDP and the Local Plan will address both strategic and site specific infrastructure and will not be artificially constrained by geographic or administrative boundaries.

Question Number 32		
<ul style="list-style-type: none"> Question Text: Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure? <p>NO</p> <p><i>If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.</i></p>		
Key points raised in representations		Officer response
1. Developer contributions should be ring fenced to be used for the area in which the new development takes place	Obtaining, holding and using developer contributions is subject to strict legal requirements. CIL is used to improve and mitigate effects of development on the wider community. Funding obtained through s106 Agreements has to be related to the development giving rise to the Agreement and will therefore have a local element to them.	
2. CIL and s106 Agreement funding is inadequate to provide necessary new or upgraded infrastructure and Council Tax should not be used for such purposes.	CIL and s106 Agreements are primarily driven by the impacts of new development. Amounts that can be obtained through those processes are subject to legal requirements and financial guidelines set by central Government. Areas of infrastructure improvement not covered by CIL or s106 Agreements have to be funded by a variety of other financial means which may include government and private commercial led initiatives.	

<p>3. Crowd funding and use of voluntary labour are not sound solutions</p>	<p>The reference to crowd funding is one of a number possible areas which the Council may consider going forward as part of innovative thinking for funding infrastructure and that includes use of volunteers. Use of crowd funding and voluntary resources are seen as having a possible role to play where they are used appropriately and proportionately.</p>
<p>4. List of studies (p.84) on how infrastructure will be funded seems old and needs updating (AVDC)</p>	<p>25 Plans and Studies are listed of which:</p> <ol style="list-style-type: none"> 1. 9 are 5 years old or less; 2. 9 are between 5 and 9 years old and; 3. 5 are greater than 10 years old. <p>Of those in category 2 a new Water Study has been commissioned and is expected to be published early in 2019. Herts LTP 3 has been replaced by LTP4 in May 2018 after the IO Paper consultation was launched. Of those in category 3 a new L1 SFRA was commissioned in 2018 and is expected to be published in early 2019. Updated plans and studies will be taken into account in the emerging Local Plan</p>
<p>5. Lack of confidence that developers will be held to commitments to provide or improve infrastructure</p>	<p>S106 Agreements are legally binding upon developers and other parties entering into them, including the provision of new or upgraded infrastructure. CIL requires “up front” financial contributions from developers.</p>
<p>6. Continuing cross boundary co-operation is necessary to avoid or at least mitigate detrimental impacts on neighbouring areas</p>	<p>The Duty to Co-operate is recognised as a fundamental principle and is required as part of the soundness test for local Plans. DBC is committed to the principle and is involved in a number of cross boundary strategies and partnerships such as the South West Herts JSP, Water Cycle Study and SFRA and the East Hemel Hempstead development on SADC land.</p>

<p>7. Funding will not provide physical space that is not there for new or upgraded infrastructure</p>	<p>The provision of new or upgraded infrastructure for and impacts upon the existing infrastructure arising from new development are factored into site allocations and grants of planning permission. Technology exists in nearly cases to overcome infrastructure issues (including restricted availability of land or space) but may require greater cost or longer timing or phasing for appropriate works to be carried out, for example provision of new roads, new transport services or building more infrastructure underground.</p>
<p>8. Liaise with local community clubs and organisations to identify specialist funding that may be available</p>	<p>This is a similar issue to 3 above. DBC actively seeks funding opportunities to assist with the delivery of infrastructure. DBC's engagement with its community will continue to assist in identifying funding opportunities.</p>

Question Number 33	
Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?	
YES	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
1. Several respondents including BRAG claim that it is premature to determine housing numbers. There needs to be consideration of the St Albans extension to Hemel Hempstead and how this will be reflected in the housing numbers. This also does not consider the many land constraints (Green Belt and Chilterns AONB) within the Borough and so a lower number should be sought (430 a year as stated in Core Strategy).	<p>The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>Cross boundary issues with SADC and other neighbouring LPA will be addressed through the DtC process.</p> <p>The Local Plan evidence base will address all material considerations including Green Belt issues; the site assessment study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>

Question Number 33

Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

2. Support from respondents for Option 1 as this would best balance the needs of housing numbers and the environment

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The overall sustainability of the plan will be addressed through the SA/SEA process.

3. Several respondents support the proposal of 756 homes per annum based on the South West Hertfordshire Strategic Housing Market Assessment.

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 33

Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

4. Some concern from respondents regarding the changes to Central Governments standard methodology and how this will be reflected. Suggestions that more sites should be identified to ensure that there is provision above option 3

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability

5. Do not believe that housing numbers reflect local needs rather local demand

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

Question Number 33

Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

6. These numbers do not reflect capacity or infrastructure constraints within the Borough or the consequences of each housing growth option

Officer response

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 33**Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?****NO***If no, please explain your reasons, with reference to evidence where available.*

Key points raised in representations	Officer response	Actions to be taken
1. Chilterns Conservation Board believe that the Council should challenge the needs assessment on the grounds that it does not consider the constraints of the Borough and the limited availability to produce sustainable development	<p>The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>Cross boundary issues with SADC and other neighbouring LPA will be addressed through the DtC process.</p> <p>The Local Plan evidence base will address all material considerations including Green Belt issues; the site assessment study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>	

Question Number 33		
Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?		
NO		
<i>If no, please explain your reasons, with reference to evidence where available.</i>		
Key points raised in representations	Officer response	Actions to be taken
2. Berkhamsted Town Council feel that lower levels of housing should be considered below option 1	Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology. The overall sustainability of the plan will be addressed through the SA/SEA process.	
3. Markyate Parish Council would like to see issues of water availability resolved before development comes forward and even then this should only meet local needs	The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability. The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology. The overall sustainability of the plan will be addressed through the SA/SEA process.	

Question Number 33		
Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?		
NO		
<i>If no, please explain your reasons, with reference to evidence where available.</i>		
Key points raised in representations	Officer response	Actions to be taken
4. Tring Town Council believe that there is no evidence to suggest that the Council has considered the constraints of the Borough. They argue that other authorities have asked neighbouring Boroughs to take housing numbers and is something that the Council should consider. They also feel that there needs to be a more realistic assessment of the amount of development each settlement can withstand	<p>The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>Cross boundary issues with other neighbouring LPA, including addressing any unmet need against the OAN, will be addressed through the DtC process.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>	
5. Welwyn Hatfield Borough Council request for Dacorum to further consult with them in regards to housing needs and taking housing numbers	Noted: there will be further statutory consultation on the Local Plan and this will be supplemented with DtC meetings with Welwyn Hatfield Borough Council and other LPA.	
6. Historic England would like to see further assessment of the sites selected and the heritage assets.	Noted: this will be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.	

Question Number 33

Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

Actions to be taken

7. **Central Bedfordshire Council** believe that the plan should be aiming for the upper government figure in accordance with the Government methodology

Noted; The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

8. **Northchurch Parish Council** lower growth options should be considered due to limited infrastructure

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 33		
Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?		
NO		
<i>If no, please explain your reasons, with reference to evidence where available.</i>		
Key points raised in representations	Officer response	Actions to be taken
9. St Albans City & District Council do not believe that all of the options, more specifically the approach to urban regeneration and development beyond the Green Belt have not been considered.	Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB. The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability. Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.	
10. Hertfordshire County Council believe that there is a need to further assess transport issues based on different options through COMET modelling. Consider neighbouring authorities and the issues it brings up with road capacity and the timely delivery of new infrastructure.	Noted: this will be addressed through the Local Plan Evidence Base including the IDP and the DTC process with HCC, other LPA, Highways England. County Transport Policies will be considered and taken into account in developing the Local Plan. The overall sustainability of the plan will be addressed through the SA/SEA process.	
11. Public Health Service (HCC) would like to see Health Impact Assessments carried out as part of the new Local Plan process.	Noted: this will be considered as part of the compilation of the Local Plan Evidence Base.	

<p>12. Berkhamsted Residents Action Group believe that the growth options do not consider the existing infrastructure and capacity issues of the Borough. They also feel that there is no robust evidence to argue the housing numbers that should be as high as it does not factor in the many land constraints of the Borough (Green Belt etc.), or there should be discussion with neighbouring authorities about taking housing numbers. They also do not believe that the Strategic Housing Market Assessment is accurate as the figures it initially used for its projections have since changed and should be amended. BRAG would also like to see further consultation with St Albans regarding housing numbers.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p>
<p>13. Grove Fields Residents Association believe that Option 2 is the most appropriate by going with assessed needs, however they also mention that the land constraints of the Borough have not been considered.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p>

Question Number 33		
Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?		
NO		
<i>If no, please explain your reasons, with reference to evidence where available.</i>		
Key points raised in representations	Officer response	Actions to be taken
	<p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p>	

<p>14. Kings Langley & District Residents Association do not believe that any of the proposals are reasonable or that meeting a 5 year housing land supply should warrant the release of Green Belt land. The other concern that they raise is how this land will be allocated across the Borough with several lower performing Green Belt in Kings Langley.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>The NPPF sets out that the minimum planning threshold for planning housing delivery is 15 years from the start of the plan.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>
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Question Number 33

Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations	Officer response	Actions to be taken
15. Several respondents raise concerns about the use of Green Belt land to meet housing numbers and feel that these figures have not been justified through proper assessment or take into consideration the land constraints of the Borough	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>	

Question Number 33

Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

Actions to be taken

16. Many respondents suggest that these housing figures cannot be met and that there should either be an assessment to determine where infrastructure could support development, or that it should be focused on the three large towns where infrastructure is more readily available

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 33**Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?****NO***If no, please explain your reasons, with reference to evidence where available.***Key points raised in representations**

17. Some respondents believe that it is premature to choose any growth option on the basis that there is a lot of political uncertainty, and that growth rates could change. In favour of maintaining land for its existing uses until changes are made clear

Officer response

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Actions to be taken

<p>18. Some respondents feel that these growth options would damage settlement character, specifically within the market towns and villages.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB. This review will take into account impacts on the character, setting and appearance of existing settlements, the wider area including the CAONB.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>
<p>19. Developers raise concerns that the Council will need to go with Option 3 to reflect Governments standard methodology approach, or risk being found unsound.</p>	<p>Noted; since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p>

Question Number 33		
Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?		
NO		
<i>If no, please explain your reasons, with reference to evidence where available.</i>		
Key points raised in representations	Officer response	Actions to be taken
20. Many residents feel that the Council has not actively explored alternatives to growth, either through consultation with neighbouring authorities, urban capacities or conducting studies on the feasibility of meeting the land requirements.	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The NPPF does not allow for a minimal or no growth scenario in Dacorum unless compelling evidence can be provided to support and justify such an approach.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>	

Question Number 34 -

Question Text: Do you agree with the rejection of the following growth levels:

- 1. Continuing the current housing target (430 homes a year);**
- 2. 'Urban Capacity' option (476 homes a year); and**
- 3. Significantly above the upper Government figure (1,100+ homes a year).**

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. **Chilterns & South Bucks District Council** largely support the rejection of the stated growth levels due to the need to meet the greater housing need (as outlined in the Government growth figures). Yet, Chilterns & South Bucks District Council would like to prospectively test if Dacorum can accommodate the housing needs of neighbouring authorities where supply is constrained.

The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

Cross boundary issues with Chilterns & South Bucks District Council and other neighbouring LPA will be addressed through the DtC process.

2. **Markyate Parish Council** made their formal comments on growth levels earlier on in the consultation period; however, suggest that no new housing should be built (especially in Markyate) until the issue with water supply in Dacorum is resolved.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

	The overall sustainability of the plan will be addressed through the SA/SEA process.
3. Little Gaddesden Parish Council support the rejection of the three stated growth levels, but made no further comment.	Noted: the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.
4. Several respondents shared the same view that all three growth options should be rejected and propose that a growth figure higher than the objectively assessed need should be adopted, in order to meet Central Government's housing aspirations. The 'Urban Capacity' option is not compliant with the NPPF which promotes the release of valuable Green Belt land for housing delivery; while option 3's upper figure of 1,100 houses per year is 2.5 times higher than the current adopted Core Strategy and is not realistically deliverable over the forthcoming Local Plan Period.	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>

Question Number 34

Question Text: Do you agree with the rejection of the following growth levels:

1. *Continuing the current housing target (430 homes a year);*
2. *'Urban Capacity' option (476 homes a year); and*
3. *Significantly above the upper Government figure (1,100+ homes a year).*

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

1. **Berkhamsted Town Council** view that the current housing target of 430 homes per year (option 1) should be maintained given that the infrastructure across Dacorum is at capacity.

Officer response

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 34

Question Text: Do you agree with the rejection of the following growth levels:

- 1. *Continuing the current housing target (430 homes a year);*
- 2. *'Urban Capacity' option (476 homes a year); and*
- 3. *Significantly above the upper Government figure (1,100+ homes a year).*

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

2. **Tring Town Council** state that until the call-for-sites and the updated Brownfield Register are published, the relative housing deficit cannot be classified as 'exceptional circumstances' and Green Belt land should not be released for development.

Officer response

The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The Brownfield Register is updated annually; however, the Urban Capacity Study is a more appropriate methodology to address the point raised.

Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.

3. **Central Bedfordshire Council** suggest that Dacorum should plan to meet the upper Government growth figure (option 3) until a final housing figure is identified.

Noted; The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

Question Number 34

Question Text: Do you agree with the rejection of the following growth levels:

- 1. *Continuing the current housing target (430 homes a year);*
- 2. *'Urban Capacity' option (476 homes a year); and*
- 3. *Significantly above the upper Government figure (1,100+ homes a year).*

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations	Officer response
<p>4. Northchurch Parish Council view that a lower growth figure lower than the three options state should be adopted due to the insufficient infrastructure in Dacorum.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>
<p>5. Historic England (HE) will not provide a preferred growth option until the potential impacts on heritage sites are assessed. HE states that the cumulative impacts of development should be considered in relation to the historic environment (e.g. Gorhambury land).</p>	<p>Noted: this will be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.</p>

Question Number 34

Question Text: Do you agree with the rejection of the following growth levels:

- 1. *Continuing the current housing target (430 homes a year);*
- 2. *'Urban Capacity' option (476 homes a year); and*
- 3. *Significantly above the upper Government figure (1,100+ homes a year).*

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

6. **The Chilterns Conservation Board** suggest that the process of using OAN (objectively assessed needs) and relative constraints to establish a housing figure may set a lower rate of growth in Dacorum. The Urban Capacity option is favoured, provided that the existing Greenfield sites put forward for development do not harm the AONB or other natural heritage sites.

Officer response

The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

Cross boundary issues with SADC and other neighbouring LPA will be addressed through the DtC process.

The Local Plan evidence base will address all material considerations including Green Belt issues; the site assessment study will deliver an initial assessment of site suitability.

The overall sustainability of the plan will be addressed through the SA/SEA process.

<p>7. Berkhamsted Residents Action Group (BRAG) do not agree with the rejection of the Urban Capacity option and view that the 476 homes per year figure for Urban Capacity is an underestimate. BRAG also query the robustness of DBC's housing figures given the inaccurate methodology in the SHMA and the fact that the relative decrease in household numbers is not accounted for. The environmental constraints (such as the AONB and SSSIs) affecting housing delivery in Dacorum need to be realistically assessed in line with the sites coming forward and the Government guidance on Green Belt preservation. Furthermore, BRAG suggest that consideration should be given to increasing the density of buildings in new housing developments to release capacity for growth.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p>
<p>8. Berkhamsted Citizens Association (BCA) disagree with the rejection of the stated growth levels. BCA suggests that, due to the restriction on Green Belt release, the Urban Capacity option of 476 houses per year with a figure of less than the 602 is the most appropriate level of growth for Dacorum. DBC's urban capacity is 11% higher than the current growth</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p>

Question Number 34	
Question Text: Do you agree with the rejection of the following growth levels:	
<ol style="list-style-type: none"> 1. <i>Continuing the current housing target (430 homes a year);</i> 2. <i>'Urban Capacity' option (476 homes a year); and</i> 3. <i>Significantly above the upper Government figure (1,100+ homes a year).</i> 	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
<p>figure of 430 houses/year – an increase in housing density and height should be considered. Moreover, the 6.1.14 paragraph outlining Dacorum’s approach to housing figures in relation to the expiry of the current Local Plan is highly misleading. BCA assert that there is no concrete evidence stating that the upper Government figure of 1,100 houses/year would need to be met if Dacorum’s Local Plan is more than 5 years old; Central Government offer a two-year grace period whilst the new Local Plan is being drafted. BCA also raise concern over the fact that the forthcoming development in East Hemel Hempstead proposed by St Albans is not included in Dacorum’s new Local Plan.</p>	<p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p>

<p>9. Grove Fields Residents Association (GRFA) broadly agree with the rejection of the stated growth levels; however, the Urban Capacity option should be comprehensively reassessed in order for the density, scale and massing of Brownfield sites to be fully considered to maximise the efficiency of housing delivery.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p>
<p>10. Kings Langley and District Residents Association (KLDRA) neither agree with the rejection of the growth level options 1 and 2, nor with the proposed use of Green Belt land as outlined in paragraph 10.1.8. Housing density needs to be increased to maximise the delivery of Brownfield sites – assistance of the Brownfield Register for Dacorum. Option 1:</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p>

<p>sets a housing target that is lower than the technical studies (including Greenfield sites) propose. Option 2: DBC have engaged in insufficient discussions with neighbouring authorities regarding cross-boundary housing issues – housing and employment land in Kings Langley and Gorhambury need to be relative to Dacorum’s figures due to their strategic, cross boundary position. Option 3: this upper figure is unrealistic and undeliverable considering the environmental constraints in Dacorum hindering the delivery of housing.</p>	<p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>The NPPF sets out that the minimum planning threshold for planning housing delivery is 15 years from the start of the plan.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The site assessment study and Urban Capacity Study will deliver an initial assessment of site suitability.</p> <p>The DtC process will address cross border and technical issues with neighbouring LPA and other key partners.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p>
<p>11. The significant infrastructure constraints in Dacorum do not support growth at the current level of 430 houses per year, therefore it is unsustainable to increase the housing figure in the forthcoming Local Plan Period.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p>

Question Number 34	
<p>Question Text: Do you agree with the rejection of the following growth levels:</p> <ol style="list-style-type: none"> 1. <i>Continuing the current housing target (430 homes a year);</i> 2. <i>'Urban Capacity' option (476 homes a year); and</i> 3. <i>Significantly above the upper Government figure (1,100+ homes a year).</i> <p>NO</p> <p><i>If no, please explain your reasons, with reference to evidence where available.</i></p>	
Key points raised in representations	Officer response
	<p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>

<p>12. The uncertain impact of Brexit and the predicted decline in immigration and population should be taken into account when determining the housing figure for Dacorum.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology. The baseline data that underpins the Standard Methodology is not impacted by the Brexit process: any changes that may arise will be addressed through update to the base ONS data and other factors feeding into the standard methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>
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Question Number 35	
Question Text: Has the Council considered all reasonable alternative levels of growth?	
YES	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
1. D B Land & Planning – the Council has considered a broad spectrum of housing scenarios and that lower levels of growth have been properly discounted through the process.	Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.
2. The Crown Estate – Whilst other options could have been considered between 602 homes per year and 1,100 homes per year, it would not have assisted the clarity of the consultation process. The three levels of growth usefully establish the range of issues to be considered.	Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

Question Number 35	
Question Text: Has the Council considered all reasonable alternative levels of growth?	
YES	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
<p>3. Berkhamsted Citizens – Yes but have not considered the rejected options properly. Lower figures, which could be sustainable and achievable within identified constraints, should be explored. Uses response to Q16 as an example to prove this.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>

Question Number 35

Question Text: Has the Council considered all reasonable alternative levels of growth?

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

4. **Gladman Development LTD** – state that it is important that the Dacorum Local Plan makes a significant contribution to the Government's strategy for housing and economic growth. Gladman considers that the Dacorum Local Plan should be planning for 1,100 net new dwellings per annum. This growth is essential if the Government's aspiration of significantly boosting housing supply is to be achieved.

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

5. **Gallagher Estates** the Council could have considered an alternative option of the SHMA figure adjusted in line with the latest household projections and other suggestions set out in the Housing Evidence Base Review Paper. Should the Revised NPPF not change the policy framework concerning identifying dwelling requirements, then it is suggested that the SHMA is updated to reflect the concerns set out.

Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

Question Number 35	
Question Text: Has the Council considered all reasonable alternative levels of growth?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
<p>1. Berkhamsted Town Council - Lower figures, which could be sustainable and achievable within identified constraints, should be explored. Consider that Hemel Hempstead has a higher urban capacity (above the assumed figure of 8900). Take into account recent government statements encouraging the use of high-rise buildings in appropriate locations.</p>	<p>Noted; however since the I+O consultation was carried out the Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>This will also be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.</p>

Question Number 35

Question Text: Has the Council considered all reasonable alternative levels of growth?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

2. Markyate Parish Council - do not believe that any new housing should be considered until the water supply issue is resolved. Do not believe Markyate is appropriate for any further building save to meet local needs.

Officer response

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 35	
Question Text: Has the Council considered all reasonable alternative levels of growth?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
<p>3. Tring Town Council - Whilst recognising the pressure being faced by the Planning Team, the options being considered should have reflected more closely the levels of growth that can be achieved sustainably. There is no evidence that Dacorum has actively explored the potential of exporting a large proportion of the calculated growth to other less constrained areas of Hertfordshire or other authorities. Such discussions should have taken place before the Issues and Options consultation. There should be more clarity on DTC between St Albans and Dacorum. a blanket imposition of a target without consideration of local circumstances is irresponsible. A clear and accepted policy on when it can be deemed that Green Belt does not meet the Government's tests for such a designation is needed</p>	<p>The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.</p> <p>The Brownfield Register is updated annually; however, the Urban Capacity Study is a more appropriate methodology to address the point raised.</p> <p>Any release of Green Belt that may be proposed will be assessed against and informed by the Part 1 and 2 Green Belt Studies.</p> <p>Cross boundary issues with neighbouring LPA will be addressed through the DtC process. The outcomes of these meetings will be addressed through SoCG and/or MoU and this will also be covered on the DtC Compliance Report.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>

Question Number 35

Question Text: Has the Council considered all reasonable alternative levels of growth?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

4. Historic England – do not have a preference on growth options until further analysis has taken place on heritage impacts. Keen to ensure that development enhances and conserves the HI. A good understanding of the cumulative impacts of development is an important part of understanding the wider impacts upon the historic environment. (Pleased this was mentioned concerning the Gorhambury development).

Noted: this will be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.

5. Central Bedfordshire Council - the plan should seek to accommodate the upper Government figure for growth (option 3) until such time that the finalised methodology is published and a final housing figure is identified. Planning for the upper limit will ensure that the Borough Council can deliver the final housing requirement identified

Noted; The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

Question Number 35	
Question Text: Has the Council considered all reasonable alternative levels of growth?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
6. Greater London Authority - The Council has assessed different levels and distributions of growth. GLA would welcome the further consideration of options designed to meet the identified housing need. They would also encourage cooperation with St Albans Council to resolve cross-boundary matters on growth figures. The Council should note that the latest population and household projections are now also available on the London Data store: https://data.london.gov.uk/dataset/2016-based-projections-national-outputs . These projections include consistent outputs for all local authorities in England and form the basis for housing need in the draft London Plan.	Noted; The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology. Cross boundary issues with neighbouring and other LPA will be addressed through the DtC process. The outcomes of these meetings will be addressed through SoCG and/or MoU and this will also be covered on the DtC Compliance Report.
7. NHBE – no comment	Noted
8. Chilterns Conservation Board - The Urban Capacity options plus any greenfield sites that do not harm the Chilterns AONB or its setting would have merit. The capacity for development in landscape and environmental terms in Dacorum should help establish the appropriate number.	The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology. Cross boundary issues with Chilterns & South Bucks District Council and other neighbouring LPA will be addressed through the DtC process.

Question Number 36

Question Text: Do you support the proposed location principles?

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. **Berkhamsted Town Council and Berkhamsted Residents Action Group** agree in principle, but do not agree that these can be covered through the release of Green Belt. They feel that this needs to be provided within the urban area as high density development on town boundaries is not appropriate

Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.

This will also be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.

2. **Hertfordshire County Council-** Development services, Property and resources support the location principles suggested, with particular emphasis on choosing sites based on their sustainability performance and their ability to provide infrastructure provisions to support development.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 36

Question Text: Do you support the proposed location principles?

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

3. **Grove Fields Residents Association** support the locational principles, providing these take into account the specific issues of each settlement (eg character and pressure and availability of infrastructure) and therefore development should be focused towards Hemel Hempstead.

Officer response

Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

This will also be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.

Question Number 36

Question Text: Do you support the proposed location principles?

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

4. There is support from respondents; however, they do not believe that these have been applied within some of the sites selected in the Schedule of Site Appraisals.

Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

This will also be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.

5. Respondents believe that the 5 year housing land supply should not justify the release of Green Belt land

The NPPF sets out that the minimum planning threshold for planning housing delivery is 15 years from the start of the plan.

The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

6. Respondents believe that these locational principles should be reviewed on a site by site basis

This will also be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.

Question Number 36

Question Text: Do you support the proposed location principles?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. Chilterns Conservation Board believe that a location principle for the Chilterns Area of Outstanding Natural Beauty and its setting should be included.

Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB. Account will be taken of impacts on the setting of settlements, the rural area and specifically designated and/or protected areas such as the CAONB

2. Markyate Parish Council believe that housing should not be considered until issues of water availability have been resolved and that these numbers should only reflect local needs.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

This will also be addressed as part of the DtC discussions with Affinity Water and Thames Water.

Question Number 36

Question Text: Do you support the proposed location principles?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

3. Tring Town Council believe that policy CS1 from the Core Strategy should take precedence over the Locational Principles.

The starting point for setting the Local Plan Policies including identifying sites is the NPPF. The Local Plan will replace the existing Core Strategy which will cease to have weight in decision making once the Local Plan has been adopted.

As part of the development of the Local Plan all extant policies will be reviewed and considered for compliance with the NPPF and suitability for rolling forward into the Local Plan on the currently drafted form or with amendment; alternatively new NPPF compliant policies will be drafted.

4. Historic England would like to see further assessment of the chosen sites regarding the potential heritage impacts, and that there needs to be understanding of the wider cumulative impacts of development on the historic environment.

Noted: this will be addressed through the Site Assessment Study, Urban Capacity Study, detailed assessment of potential site allocations and general policy framework.

The cumulative impacts of development will be considered for a full range of issues including the historic environment.

Question Number 36

Question Text: Do you support the proposed location principles?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

5. Northchurch Parish Council do not support the principle that density should be maximised in areas where it would go against settlement character, however this is supported in Hemel Hempstead to assist with urban regeneration. Also believe that development cannot happen in the Northchurch and Berkhamsted areas as infrastructure is limited and so do not agree with the 5 year housing land supply.

Officer response

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

The NPPF sets out that the minimum planning threshold for planning housing delivery is 15 years from the start of the plan.

The Objectively Assessed Housing Need is now determined by the Standard Methodology set out in the NPPF and NPPG; this will identify the starting point for housing delivery and the NPPF makes it clear that a compelling case must be made to set a target below that derived from the Standard Methodology.

The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 36	
Question Text: Do you support the proposed location principles?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
6. St Albans City & District Council feel that Green Belt should be a locational principle and should be reviewed as part of this to address meeting targets (Green Belt policy approach).	Noted: any decisions around allocation of sites in the Green Belt will be addressed in accordance with the policies and principles contained in the NPPF and informed by the Stage 1 and Stage 2 Green Belt reviews.
7. Hertfordshire County Council - the Natural, Built and Historic Environment Advisory Team believe that a historic environment locational principle should be included.	Noted: this will be addressed through the Site Assessment Study and Urban Capacity Study.
8. Berkhamsted Residents Action Group and Berkhamsted Citizens Association believe that the use of a 5-year housing land supply as a locational principle would result in the immediate release of Green Belt land. The wording should be changed so that it is meet within the urban capacity. They also believe that development in the market towns would have a negative impact.	<p>The NPPF sets out that the minimum planning threshold for planning housing delivery is 15 years from the start of the plan.</p> <p>Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.</p> <p>The potential to meet the OAN within existing settlements will be addressed through the Urban Capacity Study.</p> <p>The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability.</p>

Question Number 36	
Question Text: Do you support the proposed location principles?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
9. Chilterns Society believe that there should be a locational principle on the conservation and enhancement of the Chilterns AONB and retaining the openness of the Green belt	Noted: this will be addressed through the Site Assessment Study and Urban Capacity Study.
10. Numerous respondents are in disagreement of the proposal for high density building, need for family homes and outdoor space in developments.	Noted: The Local Plan evidence base will address all material considerations including; infrastructure requirements (through the IDP), the site assessment study will deliver an initial assessment of site suitability. This will be addressed through the Site Assessment Study and Urban Capacity Study. Development options will be comprehensively reviewed through the Local Plan development and will include a comprehensive review of sites in the Urban area, green belt and land beyond the Green Belt and CAONB.
11. Number of developers believe that the locational principles restrict the deliverability of development, as it does not consider the availability of brownfield sites, and that urban regeneration plays an important part of maintaining settlement viability and so this should not be restricted to Hemel Hempstead	Noted: This will be addressed through the Site Assessment Study and Urban Capacity Study.

Question Number 36	
Question Text: Do you support the proposed location principles?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
12. Public Health Service- Hertfordshire County Council believe that there should be greater consideration of Health Impact Assessments as part of the site allocation process	Noted: this will be considered as part of the compilation of the Local Plan Evidence Base.
13. Kings Langley & District Residents Association want to ensure that they maintain settlement separation in alignment with Green Belt principles.	This will be addressed through the Site Assessment Study and Urban Capacity Study.
14. Respondents raise concerns about the housing numbers in St Albans on the edge of Hemel Hempstead and whether this will form part of Dacorum's housing number.	Noted; the option to count numbers in St Albans area and/or for St Albans to help deliver Dacorum's OAN will be addressed through DtC discussions where this is supported by the Local Plan evidence base demonstrating that DBC cannot meet its full OAN with the Borough boundaries.

Question Number 37

Question Text: Do you agree with the rejection of the following growth distributions:

- 1. New settlement (town or village);**
- 2. Rural growth;**
- 3. Export growth to another Council area;**
- 4. Use greenfield land before brownfield land; and**
- 5. Significant expansion of a large village(s)**

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations	Officer response
1. Little Gaddesden Parish – No comment.	The council acknowledges the response made by Little Gaddesden Parish Council.
2. Berkhamsted Town Council - Looking at each in turn 1.New settlement (town or village) Yes, as there is no suitable site in Dacorum given the AONB coverage. We regret that the lack of regional strategic planning prevents this option being used regionally. 2. Rural growth. Yes. 3. Export growth to another Council area. No, the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum’s total, as Dacorum will need to provide the facilities and much infrastructure for this site. 4. Use Greenfield land before Brownfield land. Yes, we agree strongly with rejecting this approach but this consultation document suggest that DBC is not doing that. 5. Significant expansion of large villages Yes, but more scope could be given (albeit not major) for some further expansion of the villages. This will enhance the viability and sustainability of village centres.	The council acknowledges the response made by Berkhamsted Town Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF

Question Number 37

Question Text: Do you agree with the rejection of the following growth distributions:

- 1. New settlement (town or village);**
- 2. Rural growth;**
- 3. Export growth to another Council area;**
- 4. Use greenfield land before brownfield land; and**
- 5. Significant expansion of a large village(s)**

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations	Officer response
<p>1. Markyate Parish – the parish not believe that any new housing should be considered until the water supply issue is resolved. They do not believe Markyate is appropriate for any further building save to meet local needs.</p>	<p>The council acknowledges the response made by Markyate Parish Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p> <p>Infrastructure provision will be addressed through the IDP.</p>
<p>2. Central Bedfordshire – CBC would expect to be consulted upon any specific proposals taken forward at Markyate given the proximity of the settlement to Central Bedfordshire.</p>	<p>The council acknowledges the response made by Central Bedfordshire District Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p> <p>Cross border issues will be addressed through the DtC process.</p>
<p>3. Northchurch Parish – New Settlement (town or village) Yes Rural growth. No Export growth to another Council area. No Use Greenfield land before brownfield land. Yes Significant expansion of large villages. Yes</p>	<p>The council acknowledges the response made by Northchurch Parish Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p>

Question Number 37	
Question Text: Do you agree with the rejection of the following growth distributions:	
<ol style="list-style-type: none"> 1. <i>New settlement (town or village);</i> 2. <i>Rural growth;</i> 3. <i>Export growth to another Council area;</i> 4. <i>Use greenfield land before brownfield land; and</i> 5. <i>Significant expansion of a large village(s)</i> 	
YES	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
<p>4. St Albans Diocesan Board of finance – It is inevitable that Hemel Hempstead will provide a focus for growth through the plan period; however, SADBF strongly endorse the location of significant levels of growth at the other two towns within the District. Berkhamsted and Tring are sustainable locations for development, with good road and public transport access and a range of facilities and services within the town. It is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place. However, the disbursement of growth provides a far more sustainable pattern of development</p>	<p>The council acknowledges the response made by the St Albans Diocesan Board of Finance. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p> <p>Infrastructure provision will be addressed through the IDP.</p>

Question Number 37

Question Text: Do you agree with the rejection of the following growth distributions:

- 1. New settlement (town or village);**
- 2. Rural growth;**
- 3. Export growth to another Council area;**
- 4. Use greenfield land before brownfield land; and**
- 5. Significant expansion of a large village(s)**

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations	Officer response
<p>1. Chiltern and south bucks district - Rejected options to export growth to another Council area (q 37 .3) and the rejection of significant expansion of a large village (q 37.5) which are not reasonable options in relation to the particularly constrained characteristics of nearby Chiltern and South Bucks and in relation to Bovingdon.</p>	<p>The council acknowledges the response made by Chiltern and South Bucks District Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p>
<p>2. Hertsmere Borough Council – first questioned the assumption that a new settlement could not deliver sufficient homes required in the Plan period; homes could start to be delivered later in the period and would thus contribute significantly to the meeting of housing need. Although there is initial cooperation, HBC considers that it is premature at this stage to state that this work will consider potential locations/sites for new garden settlements; such a commission has not been agreed between authorities.</p>	<p>The council acknowledges the response made by Hertsmere Borough Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p> <p>Since these comments were made the housing figure has been set through the Standard Methodology in the NPPF.</p> <p>Cross border issues will be addressed through the DtC process supplemented by the work on the proposed Joint Strategic Plan</p>

Question Number 37	
Question Text: Do you agree with the rejection of the following growth distributions:	
<ol style="list-style-type: none"> 1. <i>New settlement (town or village);</i> 2. <i>Rural growth;</i> 3. <i>Export growth to another Council area;</i> 4. <i>Use greenfield land before brownfield land; and</i> 5. <i>Significant expansion of a large village(s)</i> 	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
3. Tring Town – Option (c) should be explored because of the constraints the Green Belt and Chilterns A.O.N.B. places on Dacorum’s ability to take further growth. With regard to the option of a new settlement, the suggestion that this is looked at on a county basis is noted. This could be linked with the announcements of development of the Oxford/Milton Keynes/Cambridge arc	The council acknowledges the response made by Tring Town Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF
4. Aylesbury Vale District – Why are there only three distribution options and is there a reason a new settlement (significant expansion of a single major settlement other than Hemel Hempstead) has not been considered?	The council acknowledges the response made by Aylesbury Vale District Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF

Question Number 37

Question Text: Do you agree with the rejection of the following growth distributions:

- 1. New settlement (town or village);**
- 2. Rural growth;**
- 3. Export growth to another Council area;**
- 4. Use greenfield land before brownfield land; and**
- 5. Significant expansion of a large village(s)**

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations	Officer response
<p>5. Welwyn and Hatfield Borough – Welwyn consider that Dacorum stated that a new settlement would have 5000 dwellings and this would be inappropriate due to AONB and green belt constraints, however WHBC believe that a smaller village of 1000 new dwellings would be a sustainable alternative. We would like to make you aware that WHBC have signed MOUs with a number of neighbouring authorities within our HMA agreeing to investigate the potential to deliver a new garden town or village(s) for meeting the longer-term needs.</p>	<p>The council acknowledges the response made by Welwyn and Hatfield Borough Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p> <p>Cross boundary issues will be addressed through DtC, the JSP and County level discussions.</p>
<p>6. Historic England – do not prefer any growth option at present until further information and analysis has been carried concerning potential heritage impacts. However, we are keen to ensure that growth and development conserves and enhances the significance of the Borough’s many heritage assets.</p>	<p>The council acknowledges the response made by Historic England. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p>

<p>7. St Albans City & District Council – Some of these are reasonable alternatives and should not be rejected. It is also important to consider planned increases in urban capacity / regeneration and development beyond Green Belt options in detail. The DBC case for rejecting new settlements, large village expansions and rural growth is not accepted. The Plan can and should set out a path for the longer term. There are options that lie beyond the Green Belt (and AONB) and thus could better align with the NPPF: The area north west of Tring seems to have significant potential. <i>“As an illustrative example, if half of this area was used for a significant new settlement, it could accommodate approximately 15-20,000 dwellings and associated infrastructure (800 Ha * 60% residential * 40 dwellings per hectare = 19,200 dwellings). This location is strategically well placed to use existing rail access. The A41 corridor main road routes and facilities / services provided by Aylesbury growth also assist. This area is well related to the Oxford / Cambridge growth area / infrastructure investment ‘zone’ beyond the Chilterns now being suggested by Government and relevant adjoining/nearby LPAs”.</i> The council. Should also consider expanding Markyate. The role that effective co-operation with local planning authorities could play in meeting any housing needs arising from This element will include St Albans district and relevant areas lying beyond the Green Belt, however the outcome cannot be prejudged.</p>	<p>The council acknowledges the response made by St Albans City & District Council. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p> <p>There are concerns that the suggested option for development to the west of Tring would not represent a sustainable development option. This will be addressed through site assessment, IDP and other studies. The SA/SEA will address the overall sustainability of the Local Plan allocations and proposals.</p>
<p>8. NHBE Herts County Council - New settlement This can actually provide the opportunity to plan for sustainable modes from the outset and, if large enough, would have critical mass for services. Rural growth Agree. These areas are likely to be least well served currently in relation to local services. Export growth to another Council area. Growth that is well planned for can be beneficial if it leads to more sustainable</p>	<p>The council acknowledges the response made by the Herts County Council - NHBE Advisory Team. The comments made will be taken into account when developing the preferred growth distribution in the new Local Plan which will also be informed by other representations received, the Local Plan Evidence base and the NPPF</p>

Question Number 37

Question Text: Do you agree with the rejection of the following growth distributions:

1. *New settlement (town or village);*
2. *Rural growth;*
3. *Export growth to another Council area;*
4. *Use greenfield land before brownfield land; and*
5. *Significant expansion of a large village(s)*

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

communities. **Use greenfield land before brownfield land**
Generally agree with rejection, but depends on site specifics as to how easy it is to make development at a particular site sustainable. **Significant expansion of large village** Agree. This is likely to need greater improvements to infrastructure. DBC has proposed three main distributions, based on the settlement hierarchy and locational principles.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 38	
Question Text: Has the Council considered all reasonable alternatives for distributing growth?	
YES	
<i>If no, please explain your reasons, and set out what other alternatives we should consider, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
1. Tring Town Council raises concerns over lack of proof regarding using alternatives.	The local plan evidence base will demonstrate the options considered and the rationale for the chosen option at the submission stage. The SA/SEA will also test options and demonstrate the the preferred option is sustainable.
2. Central Bedfordshire Council wishes to be consulted on Issue 28.	Noted; this can be addressed through the DtC process and any further formal consultation on the emerging plan.
3. Hertfordshire County Council raise that a new secondary school would be required if DBC were to deliver proposed growth levels within Berkhamsted and Tring.	Noted; the provision of infrastructure, including new school provision will be addressed through the IDP.
4. An option to produce a 'hybrid' option, combining elements of different growth options.	Noted; this will be considered as further evidence is gathered and the final growth scenario and site allocations are developed.
5. Grove Fields Residents Association and The Little Cloth Rabbit both state that all use of alternatives have not been established fully.	The local plan evidence base will demonstrate the options considered and the rationale for the chosen option at the submission stage. The SA/SEA will also test options and demonstrate the preferred option is sustainable.
6. Concerns raised over DBC's reliance on large strategic sites rather than smaller sites evenly spread across the Borough. Option C supported. Careful site allocation can reduce the impact on Green belt land.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process.

Question Number 38**Question Text: Has the Council considered all reasonable alternatives for distributing growth?****YES**

If no, please explain your reasons, and set out what other alternatives we should consider, with reference to evidence where available.

Key points raised in representations	Officer response
7. Achieving growth levels for Dacorum can only be achieved through a combination of all policies.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process.
8. Option 1 A supported.	Noted
9. The policies presented with distributing growth are inconsistent with the strategic economic policy supporting rural enterprise.	Noted: these points will be taken into account the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process.

Question Number 38	
Question Text: Has the Council considered all reasonable alternatives for distributing growth?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Berkhamsted Town Council refers to Paragraphs 37 & 38 by the Planning Inspectorate. DBC must ensure historic character and settings of towns are protected. It is recommended to focus growth in Hemel Hempstead due to the larger availability for supporting infrastructure.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process. The paragraphs referenced relate to a prior examination conducted prior to the publication of the current iteration of the NPPF published in February 2019. Historic recommendations and comments cannot be relied on over and above current National policy and guidance.
2. Markyate Parish Council raise concerns over the water supply issue in the area. The statutory consultee also believe Markyate is not appropriate for any further development.	Noted; the suitability of current infrastructure, including water supply, will be addressed through the IDP and DtC discussions with infrastructure providers.
3. Northchurch Parish Council raise concerns over the presence of other alternatives that haven't been addressed.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process.
4. Aylesbury Vale District Council raise concerns over DBC not addressing all alternatives for distributing growth across the Borough. The statutory consultee question the lack of alternative to focus a large amount of growth in one particular area other than Hemel Hempstead.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process.

Question Number 38	
Question Text: Has the Council considered all reasonable alternatives for distributing growth?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. Historic England give no preference to disturbing growth until sufficient analysis on the impact of heritage is presented. Historic England would like DBC to use a similar approach to SADC when considering the Gorhambury site.	Noted; heritage impact will be addressed through the evidence base including site assessment work, urban capacity study and the SA/SEA process. It is also intended to engage Historic England through the DtC process.
6. St Albans Diocesan Board of Finance support a distribution of growth that is spread evenly across all towns. The statutory consultee would like to see more emphasis on how new growth can deliver positive impacts on the existing settlement.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process.
7. Greater London Authority recommend DBC should consider options to need the housing need in the attached link. The statutory consultee welcomes the use of migration trends in the SWH SHMA in policy consideration. A recommendation to resolve cross-boundary matters on growth figures between DBC and SADC is encouraged.	These issues are largely addressed through the Standard Housing Methodology. Any requests to accommodate additional housing need from outside DBC will be assessed against available evidence and through the DtC process.

Question Number 38	
Question Text: Has the Council considered all reasonable alternatives for distributing growth?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
8. Berkhamsted Residents Action Group shares concerns over lack of infrastructure in Berkhamsted and Tring to support further growth. BRAG suggests Hemel Hempstead has not previously delivered fair growth levels in comparison to the rest of the Borough. Concerns were raised over the use of Green Belt land to deliver growth. Berkhamsted is said to be exploited/targeted by developers who wish to achieve a high market value with new properties in the area.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process. Housing need, distribution and mix will be addressed through the LHNA and other housing specific evidence and policies.
9. Concerns raised over DBC's ability to deliver housing numbers within brownfield areas found in inner urban areas. Delaying development on Green Belt lessens DBC's ability to meet such growth.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process. The ability of existing settlements to accommodate new development will be addressed through the Urban Capacity Study. Any proposals for development in the Green Belt will be assessed against and informed by the evidence base including: the Site Assessment Study, Green Belt Reviews and LVIA.
10. Concerns that distribution of growth is skewed by the promotion of sites by developers. DBC should prioritise advice from consultants over developer's offers.	The Green Field Site assessment will deliver an objective initial assessment of the sites put forward. Sites must be deliverable to be allocated and that impacts on options as a willing land owner/promoter is an implicit requirement to demonstrate deliverability of a site.

Question Number 38	
Question Text: Has the Council considered all reasonable alternatives for distributing growth?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
11. Growth A preferred option for growth. There is a higher percentage of people making use of public transport in Berkhamsted and Tring while commuting. A higher rate of growth in Hemel Hempstead is likely overburden infrastructure and create greater risk to delivery due to local market rates.	Noted; infrastructure needs, including transport infrastructure, will be addressed through the IDP and DtC process.
12. Distribution of growth has not considered the strengths and weaknesses of each town in terms of supporting certain levels of growth. This includes heritage and topography of each area.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process. The ability of existing settlements to accommodate new development will be addressed through the Urban Capacity Study.
13. Distribution of growth across the borough should highlight the benefits that growth can bring on Berkhamsted, Hemel Hempstead and Tring. Growth should be seen as an opportunity to enhance a certain area.	Noted: the eventual approach will be informed by the Local Plan evidence base and assessed as sustainable development option through the SA/SEA process. The ability of existing settlements to accommodate new development will be addressed through the Urban Capacity Study.
14. Further duty to co-operate discussions need to be had with Three Rivers District Council & St Albans City & District Council to determine cross boundary housing allocation.	The DtC process is ongoing with the intention of completing agreed Statements of Common Ground prior to the submission of the new Local Plan

Question Number 38	
Question Text: Has the Council considered all reasonable alternatives for distributing growth?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
15. Bovingdon airport said to be a suitable location for growth, close to major roads and other transport links.	Noted: however, this site has not been put forward, in part or whole for development. Sites must be deliverable to be allocated and that impacts on options as a willing land owner/promoter is an implicit requirement to demonstrate deliverability of a site.
16. DBC are not considering future brownfield sites for their housing allocation. DBC should make use of industrial sites that are underperforming, not fully occupied or are simply not an efficient use of a large space. DBC should also consider the benefits for building above retail units in town centres, which can mitigate increasing traffic into centres as a result of new growth.	The full potential for development within existing settlements will be addressed through the Urban Capacity study.
17. Existing towns and villages endorse higher use of fossil fuels. Delivering a new town build on sustainable principles would be of benefit to meeting housing targets.	Noted; sustainable development is a fundamental principle of the NPPF and compliance of the Local Plan to this requirement will be addressed through the SA/SEA.
18. DBC should contest national government growth levels and recommend more appropriate areas to the County Council such as housing along the new Thames Link service.	It is not the role of the Local Plan to challenge or redefine national planning policy. The statutory framework requires plans to be delivered in line with the NPPF.
19. Land north of Hemel Hempstead is being sacrificed for damaging development to meet housing numbers.	Noted; this will be assessed and addressed through the Local plan evidence base including LVIA and SA/SEA

Question Number 38	
Question Text: Has the Council considered all reasonable alternatives for distributing growth?	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
20.DBC should create a mission statement and learn from Aylesbury Vale District Council Garden Town principles and develop the surrounding areas of Hemel Hempstead sustainably. Improvements/regeneration of existing areas can help bring benefit to Hemel Hempstead in the face of new growth.	Noted; the plan will contain a vision building on and developing the principles and options set out in the Issues and Options consultation and taking account of the comments, objections and recommendations received.
21. Objection to growth by Ivy House Lane, Berkhamsted. Employment growth can be found better in Maylands area.	Noted; this will be addressed through the site assessment work and wider evidence base and the proposed scenario will be tested through the SA/SEA.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

YES

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

1. **Tring Town Council** believe that the level of growth is dependent on what can be achieved within Hemel Hempstead as previous policy and land designations mean that the ability to achieve this is limited within the rest of Dacorum and that commitments in the Core Strategy mean that this is no longer possible. Tring Town Council are in support of the development of site Tr-h5 Dunsley Farm on the grounds that it provides their priorities from the Core Strategy including employment, leisure and sports land/space, and provides social and affordable homes that have minimal impact on the environment.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The Greenfield sites study and Urban Capacity studies will inform the selection of sites.

The overall plan strategy will look at the balance of uses and supporting infrastructure.

The LHNA will inform the provision of affordable housing.

The delivery of infrastructure will be addressed through the IDP.

2. **Kings Langley & District Residents Association** believe that there should be further consideration of the developments coming from neighbouring authorities (St Albans and Three Rivers) and how these will contribute to Dacorum's housing numbers. They also believe that aiming for these lower figures would not justify the release of Green Belt land for employment uses and this could be safeguarded until the next Local Plan.

The Greenfield sites study and Urban Capacity studies will inform the quantum of development that can be delivered in Dacorum.

Any aspiration or requirement to work with neighbouring authorities to explore the potential to meet their housing needs or the need to explore options for others to accommodate Dacorum's needs will be addressed through the DtC process.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

YES

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

3. **Herts & Middlesex Badger Group** support option 1A and development around the towns as this would best preserve Green Belt land and badger habitats. They believe that there should be an assessment of brownfield and unoccupied homes within the Borough to accurately address housing need when existing infrastructure is struggling.

Noted: the Urban Capacity Study will assess the quantum of development that can be accommodated within existing settlements.

The infrastructure required to support new development will be addressed through the IDP.

4. Main residents of the small villages were in support of this option (specifically those from Kings Langley and Bovington) as this represents the fairest distribution of development across the Borough, whilst meeting housing need without the loss of Green Belt and retains the character and separation of these settlements from the larger towns.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

5. Concern from residents of smaller settlements about how any development would be accommodated in the villages as infrastructure is already at capacity. Issues highlighted by residents of Kings Langley were road capacity and parking (M25, A41 & A4251) and other physical infrastructure such as public transport, rail links and encouraging active travel were highlighted as an issue as well as the availability of social infrastructure including GPs, hospitals and schools. Another key issue raised from this is the cumulative impacts from development around Kings Langley has had on infrastructure.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The infrastructure required to support new development will be addressed through the IDP.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

YES

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

6. Concern from numerous residents of Kings Langley about the use of Green Belt land. This should be protected from development, as it is important to maintain green space for health purposes as well as settlement separation in accordance with National Planning Policy Framework. They also believe this should be protected on biodiversity grounds and because some of the sites promoted are considered community assets.

Officer response

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF.

The biodiversity value of sites will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

YES

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

7. Residents are concerned that the potential housing numbers will not take into consideration the historic environment and heritage assets located on some of these sites. Further concern was raised about how any development would reflect existing settlement character.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The historic environment and the heritage asset(s) value of sites (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations.

The overall sustainability of the plan will be addressed through the SA/SEA process.

8. Concern about the impact of development in neighbouring authorities and from other towns in the Borough and how this will impact on village life/ road capacity.

Any aspiration or requirement to work with neighbouring authorities to explore the potential to meet their housing needs or the need to explore options for others to accommodate Dacorum's needs will be addressed through the DtC process.

The cumulative impacts of development within and beyond the Borough will be addressed through the evidence base including the IDP and through DtC discussions with other LPA, infrastructure providers and highway bodies.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

YES

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

9. Many Kings Langley residents raise the point that Shendish falls within Kings Langley Parish Boundary and should therefore not count towards Green Belt release in Hemel Hempstead, and that this would need to be rectified to ensure the correct decision is made.

Noted; the plan and evidence base will address matters on a Borough wide basis.

10. Grove Field Residents Association do not believe that 300 Green Belt homes in Tring should be provided as this represents an over development of Tring, however the individual response was in support of this as it is appropriate to the settlement size.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

11. There is concern about how these housing numbers would be supported in Berkhamsted given the issues of topography

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The topography of sites will be taken into account in the Greenfield Site Assessment and detailed site assessment work in support of any sites proposed for allocation.

12. Respondents raise the need for there to be further assessment of brownfield sites and unoccupied housing, as this could result in a decreased housing need or reduce the impacts to Green Belt land

This will be addressed through the Urban Capacity study which will identify the quantum of development that can be met within existing settlements.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

NO

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

1. **Chilterns Conservation Board** object to this options as it would involve the development of Green Belt in the Chilterns AONB, meeting housing numbers is not consistent the development on Green Belt and other options would perform better in AONB protection. Consideration should be made of Chilterns position statements.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

The production of position statements will be considered further as the plan develops.

The overall sustainability of the plan will be addressed through the SA/SEA process.

2. **Chiltern & South Bucks District Council** support 1A option, however they would like to see evidence of how infrastructure needs will be meet based on the different growth options. Would like to be involved in further consultation about the potential impact of the growth options on their authority.

The provision of infrastructure will be addressed through the IDP.

Formal consultation will be carried out in accordance with the Council's SCI but will be supplemented through dialogue through the DtC process.

Question Number 39	
Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?	
NO	
<i>If no, please explain your reasons with reference to evidence where available.</i>	
Key points raised in representations	Officer response
3. Berkhamsted Town Council believe that this would result in the over development of Berkhamsted and contrary to the vision of the Borough.	Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology. The vision for the Borough will be developed taking account of the NPPF, local considerations, the responses to the I+O consultation and the Local plan Evidence base.
4. Markyate Parish Council do not believe that development should be considered until water issues are resolved and that land should be protected for local needs.	Noted: water supply issues will be addressed through the Local Plan evidence base including the Water Study and addressed through the DtC process. The IDP will also address the provision of water supply.
5. Historic England believe that there needs to be further assessment of proposals and their potential impact on heritage assets.	The historic environment and the heritage asset(s) value of sites (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.
6. Luton Airport do not support any of the options on the basis that it will include development in Markyate. As part of the LLA noise action plan/ Aviation Policy framework they are to discourage development in areas which are affected by flightpaths If sites here are promoted Luton want to be involved in the process to minimise the impacts.	Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested. Further discussions with Luton Council can take place under the DtC process; this may also extend to London Luton Airport.

Question Number 39	
Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?	
NO	
<i>If no, please explain your reasons with reference to evidence where available.</i>	
Key points raised in representations	Officer response
7. Hertfordshire County Council have no comment of which sites are preferable from a transport perspective, but want to be involved in the site assessment process by providing transport modelling. Support the proposal to focus on the three main towns, however also believe there should be some development in the smaller settlements to help support rural bus services.	Noted; HCC will be engaged through further formal consultation in line with the DBC SCI and through the DtC process on specific issues and/or HCC service areas.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

NO

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

8. **Berkhamsted Residents Action Group** feel that this option would represent the over-development of Berkhamsted and goes against the vision of the Borough in the Issues and Options document. They also believe that not enough consideration has been given to the ongoing building targets, the topography and infrastructure constraints of the town. They find that since the introduction of the Core Strategy Berkhamsted has achieved over its target whereas Hemel has not met this, and so development for the new Local Plan should be supported in Hemel.

Officer response

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF.

The topography of sites will be taken into account in the Greenfield Site Assessment and detailed site assessment work in support of any sites proposed for allocation.

The assessment of the most appropriate sites for development will take place on a Borough wide basis informed by the Local Plan evidence base.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

NO

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

9. **Grove Fields Residents Association** believe that this option would represent the over-development of Tring based on existing settlement size

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The assessment of the most appropriate sites for development will take place on a Borough wide basis informed by the Local Plan evidence base.

10. **Berkhamsted Citizens Association** state that there are already issues of over development of Berkhamsted including infrastructure and road capacity. This has resulted in serious issues in accessing Watford Hospital and ask for site KL-h3 to be reserved for health care uses. They also feel that the sites promoted would result in the loss of green space along the river banks, and these should be protected to promote tourism and industrial heritage of the Borough. They also address the need for care for the elderly, that development should respect the character of settlements and the limited opportunities are available within the market towns due to the topology and infrastructure.

The infrastructure required to support new development will be addressed through the IDP. This will include the provision of Healthcare and the need to identify sites for health care facilities will be informed by the plans and advice from the health care providers. This will also be addressed through the DtC process.

The, biodiversity, character of settlements, historic environment and the heritage asset(s) value/impact of sites proposed for development (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

NO

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

11. Many respondents feel that the levels of proposed development would be damaging to the existing settlement character specifically in the market towns, and smaller settlements, and that it would result in urban sprawl. Believe based on this that Hemel Hempstead should take most of the development.

The infrastructure required to support new development will be addressed through the IDP. This will include the provision of Healthcare and the need to identify sites for health care facilities will be informed by the plans and advice from the health care providers. This will also be addressed through the DtC process.

The, biodiversity, character of settlements, historic environment and the heritage asset(s) value/impact of sites proposed for development (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

12. Respondents raise concerns about the proposals of Green Belt sites and that this land should be protected, for ecological and pollution mitigation purposes and that demand for more housing should not justify the release of this land. Similarly, respondents raise the point that this land is used to protect the Chilterns Area of Outstanding Natural Beauty.

The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF; including the purposes of the Green Belt set out in the NPPF.

The value of undeveloped land for non-Green Belt purposes will also be considered as part of the evidence gathering and various studies to be carried out.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

NO

If no, please explain your reasons with reference to evidence where available.

Key points raised in representations

Officer response

13. All of the settlements except for Hemel Hempstead raise concerns about the availability of infrastructure to support proposed growth. This covers all manner of infrastructure requirements, and some residents request that an infrastructure assessment is carried out before sites are promoted.

The need for and provision of appropriate, necessary supporting infrastructure will be addressed through the IDP

14. Concern from some respondents that the proposal of option 1 would risk the plan being found unsound as it does not meet the Strategic Housing Market Assessment numbers. They also believe that the option to focus growth on the three main towns would not support the vitality or services in the rural small settlements.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The housing need for the Borough will be assessed through the LHNA which will identify the OAN.

The Council will review the plan for soundness before submission to PINS. A plan will not be submitted that is considered to be unsound.

Question Number 40

Question Text: is option 1B your preferred option for delivering the growth needs of the borough.

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

1. **The Chilterns Conservation Board** - considers that (of those presented) this option is likely to have the least adverse impact on the Chilterns AONB and its setting.

Officer response

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

The production of position statements will be considered further as the plan develops.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 40

Question Text: is option 1B your preferred option for delivering the growth needs of the borough.

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

2. **Flaunden Parish Council** – said that Option 1B is the only viable option. It is far better to focus development at one large site and provide the necessary infrastructure appropriate for that site and where applicable its future expansion, rather than add odd pockets of development onto already pressured small towns and villages. By dispersing the development, it would be very difficult to provide the localised infrastructure that would be required to support expansion. a more focused expansion in Hemel Hempstead (as reflected in Option 1b), would enable the correct level of focus on providing the infrastructure necessary to support such a development

Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

3. **Berkhamsted town council** - concentrates the growth on Hemel Hempstead, which as a new town already has large amounts of public open space and is far better equipped/designed to grow. Forcing large amounts of growth on the market towns is not acceptable, given the infrastructure limitations and would destroy their unique nature.

Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

4. **Cllr Townsend Tring town council** - As a member of Tring Town Council, he agrees with all the responses that have been submitted by Tring Town Council with the exception of the endorsement of Option 1A. His opinion is that Option 1B is preferable as this option provides greater protection to the Green Belt.

Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

Question Number 40

Question Text: is option 1B your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. Dacorum Environmental Forum Waste Group - the table should be re-worked within the constraints of the lower overall figure given in our reply to No16. See reply to Question 16.

Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

2. Chiltern and South Bucks District Council - Options relating to greater focus on growth levels at Hemel Hempstead (scenarios for option B). The consultation document points to the need for major changes to the road network in Hemel Hempstead to support this. At this stage there is no information as to whether this would be deliverable and so is a cause for concern in case this would lead to the diversion of additional unmitigated traffic and delays on through routes to Chesham from Hemel Hempstead.

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Highway impacts will be assessed through traffic modelling, including the HCC COMET and Paramics models.

Cross Boundary issues will also be addressed through the DtC process.

3. Markyate Parish Council - do not believe that any new housing should be considered until the water supply issue is resolved. We do not believe Markyate is appropriate for any further building save to meet local needs.

Noted: water supply issues will be addressed through the Local Plan evidence base including the Water Study and addressed through the DtC process. The IDP will also address the provision of water supply.

Question Number 40	
Question Text: is option 1B your preferred option for delivering the growth needs of the borough.	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
4. Tring town council - Whilst this option would clearly be welcomed as there is no further housing growth allocated to Tring, it is felt that Option 1A has the potential to give necessary infrastructure, which would not be forthcoming under this option.	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Other development options will be considered if this is supported by the evidence base.
5. Historic England - do not prefer any growth option at present until further information and analysis has been carried concerning potential heritage impacts. However, we are keen to ensure that growth and development conserves and enhances the significance of the Borough's many heritage assets.	The historic environment and the heritage asset(s) value of sites (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.
6. St Albans Diocesan Board of Finance - SADBFB suggest that DBC should plan for a hybrid between options 2A and 3, where a housing target of up to 1,100 dwellings per year is planned with a distribution focusing on the three main settlements. development at smaller villages can provide sustainable growth for these communities SADBFB suggests it is necessary to plan for scenario 3	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Other development options will be considered if this is supported by the evidence base.

Question Number 40

Question Text: is option 1B your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

7. **Luton Airport** - LLA is committed to being a good neighbour and endeavours at all times to minimise the impact of its operations on local communities. As demonstrated by the LLA Noise Action Plan 2013-2018, developed in conjunction with stakeholders including your Council, some of the areas identified as having potential for growth are below the flightpaths. LLA is increasing in size to accommodate an operational capacity of 18 million passengers per year. An increase in residential dwellings in the Markyate area would potentially increase the number of people who may be impacted upon by aircraft noise. LLA urge Dacorum Borough Council to consider fully the impact that aircraft noise may have upon any new residential dwellings within the noise contour areas. Also, follow the Government's Aviation Policy Framework 2013 to reduce numbers of people affected by aircraft noise.

Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested.

Further discussions with Luton Council can take place under the DtC process; this may also extend to London Luton Airport.

8. **NHBE** - We have no comment at this stage on which option/s are preferable from a transport and highways perspective. We will work with DBC as the Local Plan develops towards a preferred option, with learning from transport modelling which is underway and transport assessment work on the potential sites. It is important that new development is located in areas, which are already accessible by sustainable modes of transport or can be made so.

Noted: the offer to continue to work with DBC is acknowledged and welcomed. Appropriate opportunities to discuss matters with interested parties further will be explored through the DtC process and other processes or procedures.

Question Number 41

Question Text: is option 1C your preferred option for delivering the growth needs of the borough.

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. **Herts & Middlesex Badger Group** - 1C would be their second preferred option (which would alleviate the serious issue with North Hemel and its ancient woodlands, bio diversity and such a substantial impact on the greenbelt). We would ask that we could survey proposed sites around Tring, Berkhamsted, Markyate and Kings Langley and advise any impact on badgers that would require mitigation. Having accessed some of our records, we can confirm that some of the proposed development areas around Tring would not give us such a cause for concern as others and we would be happy to discuss these with you.

Noted: the Urban Capacity Study will assess the quantum of development that can be accommodated within existing settlements.

The infrastructure required to support new development will be addressed through the IDP.

The biodiversity value of sites will be addressed though the Greenfield Site Assessment Study and individual proposals for the allocation of sites for development.

Question Number 41

Question Text: is option 1C your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. Dacorum Environmental Forum Waste Group - the table should be re-worked within the constraints of the lower overall figure given in our reply to Q16

Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

2. Chilterns Conservation Board - objects to this option because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8) which the NPPF para 116 states should be refused except in exceptional circumstances and where it can be demonstrated it is in the public interest. Meeting housing figures is not an exceptional circumstance, there are alternatives in the housing market area not in the **AONB**.
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Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

The production of position statements will be considered further as the plan develops.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 41

Question Text: is option 1C your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

3. Chiltern & South Bucks District Council - (scenarios for option C) A potential negative implication of this option is referred to in the consultation document in terms of the inability of some smaller settlements to accommodate key facilities such as expanding primary schools. This is noted, although the option is also referred to as having the potential to deliver other forms of local infrastructure and so the extent of the knock on impacts on infrastructure capacity elsewhere is difficult to estimate and comment on. Therefore if this option is selected the Councils would like to see more evidence on how the infrastructure requirements can be met. Option 1 is consistent with the broad approach taken by Chiltern and South Bucks in that it links to the potential supply emerging from poorly performing Green Belt sites. However it is lower than the most recent SHMA which is a more appropriate basis for planning for the future.

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Highway impacts will be assessed through traffic modelling, including the HCC COMET and Paramics models.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The Greenfield sites study and Urban Capacity studies will inform the selection of sites.

The overall plan strategy will look at the balance of uses and supporting infrastructure.

4. Berkhamsted Town Council - This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4

Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

Question Number 41	
Question Text: is option 1C your preferred option for delivering the growth needs of the borough.	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
5. Markyate Parish Council - do not believe that any new housing should be considered until the water supply issue is resolved. We do not believe Markyate is appropriate for any further building save to meet local needs.	Noted: water supply issues will be addressed through the Local Plan evidence base including the Water Study and addressed through the DtC process. The IDP will also address the provision of water supply.
6. Tring Town Council - “More evenly spread across the Borough” (which is not actually given in the Issues & Options document due to a printing error) as evidenced by the allocation is actually “No increase in Hemel Hempstead”. Given the existing infrastructure in Hemel Hempstead this is perverse.	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Other development options will be considered if this is supported by the evidence base.
7. Historic England - do not prefer any growth option at present until further information and analysis has been carried concerning potential heritage impacts. However, we are keen to ensure that growth and development conserves and enhances the significance of the Borough’s many heritage assets.	The historic environment and the heritage asset(s) value of sites (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

Question Number 41

Question Text: is option 1C your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

8. St Albans Diocesan Board of Finance - DBC should plan for a hybrid between options 2A and 3, where a housing target of up to 1,100 dwellings per year is planned with a distribution focusing on the three main settlements, and also with recognition that development at smaller villages can provide sustainable growth for these communities. it is necessary to plan for scenario 3 to ensure the Plan that is produced will be sound.

Officer response

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Other development options will be considered if this is supported by the evidence base.

Question Number 41	
Question Text: is option 1C your preferred option for delivering the growth needs of the borough.	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
<p>9. Luton Airport - LLA is committed to being a good neighbour and endeavours at all times to minimise the impact of its operations on local communities. As demonstrated by the LLA Noise Action Plan 2013-2018, developed in conjunction with stakeholders including your Council, some of the areas identified as having potential for growth are below the flightpaths. LLA is increasing in size to accommodate an operational capacity of 18 million passengers per year. An increase in residential dwellings in the Markyate area would potentially increase the number of people who may be impacted upon by aircraft noise. LLA urge Dacorum Borough Council to consider fully the impact that aircraft noise may have upon any new residential dwellings within the noise contour areas. Also, follow the Government's Aviation Policy Framework 2013 to reduce numbers of people affected by aircraft noise.</p>	<p>Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested.</p> <p>Further discussions with Luton Council can take place under the DtC process; this may also extend to London Luton Airport.</p>

Question Number 41	
Question Text: is option 1C your preferred option for delivering the growth needs of the borough.	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
<p>10. NHBE - We have no comment at this stage on which option/s are preferable from a transport and highways perspective. It is recognised that the site appraisals are early stage, and more work will be needed to understand which of the green field sites would perform better in planning and transport terms.</p> <p>If development is more concentrated on Hemel Hempstead or the three main towns, then it is likely that residents of new development are less likely to travel as far to access services and facilities – although improvements may be needed to reflect population growth. Some growth in the smaller settlements may be beneficial in order that they retain the services they have – bus services to the more rural areas in the Borough can struggle for commercial viability.</p>	<p>Noted: the offer to continue to work with DBC is acknowledged and welcomed. Appropriate opportunities to discuss matters with interested parties further will be explored through the DtC process and other processes or procedures.</p>
<p>11. Cllr. Christopher Townsend, Tring Town Council - As a member of Tring Town Council I agree with all the responses that have been submitted by Tring Town Council “More evenly spread across the Borough” (as evidenced by the allocation is actually “No increase in Hemel Hempstead”. Bovingdon, Kings Langley and Markyate contribute 850 houses, whilst Berkhamsted and Tring contribute an additional 875 and Hemel Hempstead’s contribution drops to zero.</p>	<p>Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.</p>

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. Many of the developers are in agreement with this option as it presents the most appropriate spread of development across the Borough and is best, as it meets assessed needs. However, they do raise concerns about how infrastructure and market factors would affect development distribution. There is also mention of the consideration of the standard methodology.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The delivery of infrastructure will be addressed through the IDP.

2. Care home providers want to see the allocation of care homes that can release existing property to help meet housing number

Noted; the LHNA will provide evidence and guidance on the provision of care homes and other specialist facilities that may release existing property.

3. A number of respondents raise concerns about how the proposed option would affect settlement character and that this would result in the merger of settlements

The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF.

The potential impact of development on settlement character (including setting issuers) and merging of settlements will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

4. Believe that the development should be focused on areas where infrastructure can support it

The needs for and provision of infrastructure will be addressed through the IDP.

5. Should be greater focus on providing higher affordable housing numbers 40%, these numbers are only minimum to prevent further housing crisis.

The need for and quantum of affordable housing will be addressed through the LHNA and this will be supplemented through a Supplementary Planning Document.

The identification and allocation of sites for housing, including provision of affordable housing will be informed by the weighing and balancing of relevant material planning considerations. This will include housing need assessment and development viability having regard to all needs and infrastructure requirements and this will be based on evidence.

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

1. **Chilterns Conservation Board-** Object to some of the sites in Tring and Berkhamsted as they could involve development in the Chilterns AONB and should be refused. Similarly, they are concerned about other developments in the Borough that would affect the setting of the AONB. Housing numbers are not a exceptional circumstances for land release and greater consideration should be given to the Management plan the importance of land, public interest and the Chilterns report on the Cumulative impacts.

Officer response

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

The production of position statements will be considered further as the plan develops.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

2. **Chilterns & South Bucks District Council**- Believe that option 2A is most appropriate on mitigating the impacts of development on their district and that option 2 is most appropriate as 1 would be below assessed needs. DtC on the potential infrastructure impacts on the Chilterns district.

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Highway impacts will be assessed through traffic modelling, including the HCC COMET and Paramics models.

Cross Boundary issues will also be addressed through the DtC process.

3. **Berkhamsted Town Council** and other respondents including Berkhamsted Citizens Association feel that this option would represent the over development of Berkhamsted and contrary to objectives of section 4

Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

4. **Markyate Parish Council**- Issues of water supply need to be addressed, do not appropriate to further build in Markyate to meet housing need

Noted: water supply issues will be addressed through the Local Plan evidence base including the Water Study and addressed through the DtC process. The IDP will also address the provision of water supply.

Question Number 42	
Question Text: is option 2a your preferred option for delivering the growth needs of the borough.	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
5. Tring Town Council- Level of housing in option 2 would exceed capacity of Hemel Hempstead and therefore Dacorum, option 1a would be better as it has the potential to provide the necessary infrastructure which would not be forthcoming in this option.	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Other development options will be considered if this is supported by the evidence base.
6. Historic England- Keen to see that growth conserves and enhances the Boroughs assets, good to see that there has been consideration of the St Albans extension as it is important to consider the wider impacts of development on the historic environment.	The historic environment and the heritage asset(s) value of sites (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.
7. Hertfordshire County Council- No comment from a transport or highways perspective, but want to work together to assess which sites would be favourable. Development in the large towns and Hemel Hempstead would be favourable, as this would reduce the need to travel. However would like to see some development in the more rural settlements to support the viability of bus services.	Noted; these matters will be addressed through the DtC process and other discussions with HCC and will be supported and informed by traffic modelling. Transport/travel and movement will also be addressed through the SA/SEA process.

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

8. **Luton Airport** are against proposals of development in Markyate as they have a duty to limit the number of people living in areas affected by aircraft noise. If development in the area does come forward they would like to be consulted and included in the planning process.

Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested.

Further discussions with Luton Council can take place under the DtC process; this may also extend to London Luton Airport.

9. **Berkhamsted Residents Action Group** feel that this would represent the over development of Berkhamsted, as there has been no consideration of their existing commitments from the Core Strategy which has resulted in Berkhamsted going over there proposed target. They also feel that settlement character and Green Belt need to be factored in and that housing targets should not constitute exceptional circumstances, growth cannot be led by developer demand.

The infrastructure required to support new development will be addressed through the IDP. This will include the provision of Healthcare and the need to identify sites for health care facilities will be informed by the plans and advice from the health care providers. This will also be addressed through the DtC process.

The, biodiversity, character of settlements, historic environment and the heritage asset(s) value/impact of sites proposed for development (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

10. **Grove Field Residents Association** believe that this would be unreasonable and represent the over development of Berkhamsted and Tring and would underserve the market available in Hemel Hempstead.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The assessment of the most appropriate sites for development will take place on a Borough wide basis informed by the Local Plan evidence base.

11. Many respondents are against this proposal as it would mean the loss of Green Belt land and result in the merger of settlements

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The Greenfield sites study and Urban Capacity studies will inform the selection of sites. The findings of the Green Belt Studies will also be taken into account in evaluating all proposed strategies and site allocations.

The overall plan strategy will look at the balance of uses and supporting infrastructure.

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

12. Many respondents feel that there needs to be more consideration of infrastructure availability including road capacity, and transport, health care provision and over physical social and green infrastructure. Some respondents would like to see an impact assessment carried out as part of the site allocation process to determine its impact on the community.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The Greenfield sites study and Urban Capacity studies will inform the selection of sites.

The overall plan strategy will look at the balance of uses and supporting infrastructure.

The overall sustainability of the plan will be addressed through the SA/SEA process.

13. Many developers argue that this option is not adequate due to changes in the Government standard methodology and option 3 would be more appropriate. Similarly, other respondents also make the connection to this and believe this should be distributed in the same way as the A options.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The assessment of the most appropriate sites for development will take place on a Borough wide basis informed by the Local Plan evidence base.

Other development options will be considered if this is supported by the evidence base.

Question Number 42	
Question Text: is option 2a your preferred option for delivering the growth needs of the borough.	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
14. Some respondents feel that aiming for higher housing numbers in premature, as they do not feel that housing needs protections can be accurate for the length of the plan period. Similarly, they raise concerns that this would drastically increase the size of settlements	Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology. The Standard Methodology was subject to consultation as part of the wider NPPF and following this the methodology was published in February 2019 (supported by the Planning Practice and Guidance); it is not the purpose of the Local Plan to challenge the principle of this policy approach. The LHNA will address any issues specific to DBC
15. Believe that growth should be focused on Hemel Hempstead to support urban regeneration along with affordable housing in areas where employment is available.	Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology and the information available in the wider evidence base.
16. Objectively Assessed Housing Need has to be reassessed and needs to take account of the land constraints in the Borough.	The final plan will be based on the latest OAN derived from the February 2019 iteration of the Local Plan and the supporting Planning Practice Guidance.
17. Believe that this is beyond what is achievable in the urban areas. Needs to be consideration of what is achievable within the existing settlements.	The LHNA supplemented by other evidence including the Green Belt Studies, The Greenfield sites study and Urban Capacity studies will inform the selection of sites and the quantum of development that can be accommodated in DBC as part of the full evidence base. The starting position for the assessment will be the OAN derived from the Standard Methodology.

Question Number 42	
Question Text: is option 2a your preferred option for delivering the growth needs of the borough.	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
18.This proposal undermines the ability for the more rural settlements to provide some housing growth as it is necessary to ensure they remain vibrant/ viable.	Noted; further work on infrastructure, viability and sustainability will be undertaken as part of the evidence base preparation and this will inform the final strategy for rural settlements.

Question Number 43

Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations	Officer response
1. Aldbury Parish Council supports 2B with the focus of growth in Hemel Hempstead. The Parish Council believe Hemel Hempstead will better support growth through strategic transport links connecting the New Town to the rest of the Country.	Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.
2. Various organisations offered support for growth options 1C, 2A, 2B, 2C & 3.	Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.
3. Supporting comments, regarding Option 2B as the best option for growth for Bovingdon village.	Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.

Question Number 43	
Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”	
YES	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
4. Bovingdon Airfield recommended as a suitable location for growth in the Borough.	<p>Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.</p> <p>The availability and deliverability of the site along with any infrastructure requirements and other constraints will be taken into account in assessing this site against the evidence base.</p>

Question Number 43

Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

Actions to be taken

1. **Chiltern’s Conservation Board** share concerns for Growth Option 2B as it suggests significant growth on the three main settlements of the Borough which would encroach on the AONB setting. Reference was made to paragraph 115 in the NPPF in which the Council must have regard for conserving and enhancing the character of the Chilterns AONB.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

The overall sustainability of the plan will be addressed through the SA/SEA process.

Question Number 43

Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

Actions to be taken

2. **Chiltern & South Bucks District Council** share concerns over the significant growth focus on Hemel Hempstead with regards to lack of supporting infrastructure. Concerns over the cumulative impacts proposed growth will have on modal routes through Chesham towards Hemel Hempstead. The Council would like evidence to support how infrastructure requirements can be met, with further transport modelling needed.

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Highway impacts will be assessed through traffic modelling, including the HCC COMET and Paramics models.

Cross Boundary issues will also be addressed through the DtC process.

3. **Berkhamsted Town Council** raise concerns that 2B leads to overdevelopment of Berkhamsted and is contrary to objectives, policies and local aspirations.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The vision for the Borough will be developed taking account of the NPPF, local considerations, the responses to the I+O consultation and the Local plan Evidence base.

Question Number 43

Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

Actions to be taken

4. **Markyate Parish Council** share concerns over the impact on water supply for the Borough, in that development should not be considered until current issues regarding water provision is resolved.

Noted: water supply issues will be addressed through the Local Plan evidence base including the Water Study and addressed through the DtC process. The IDP will also address the provision of water supply.

5. **Tring Town Council** shares preference to options 1B & 1A with 1A having the potential to deliver necessary infrastructure requirements not forthcoming with option 1B. Option 2B exceeds Hemel Hempstead ability to absorb growth.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The Greenfield sites study and Urban Capacity studies will inform the selection of sites.

The overall plan strategy will look at the balance of uses and supporting infrastructure.

The LHNA will inform the provision of affordable housing.

The delivery of infrastructure will be addressed through the IDP.

Question Number 43		
Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”		
NO		
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>		
Key points raised in representations	Officer response	Actions to be taken
6. Historic England share no preference on growth options however ask The Council to consider heritage assets throughout the Local Plan process.	The historic environment and the heritage asset(s) value of sites (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.	
7. St Alban’s Diocesan Board of Finance recommend the merging of Options 2A & 3, and consider Growth Option 3.	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Other development options will be considered if this is supported by the evidence base.	
8. Luton Airport raise concerns over growth proposals within Markyate which fall under consulted flight paths. Reference is made to Action 17 in the LLA Noise Action Plan 2013-2018 in which growth is discouraged if fallen under flight paths, in liaison with Local Authorities. LLA request further involvement if Markyate sites are brought forward.	Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested. Further discussions with Luton Council can take place under the DtC process; this may also extend to London Luton Airport.	

Question Number 43

Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

Actions to be taken

9. **Berkhamsted Residents Association Group** identify Hemel Hempstead as the most appropriate place for growth in the Borough on infrastructure grounds. Reference is made to a recommendation by a portfolio holder which identifies Hemel Hempstead as the most appropriate place for growth. Concerns raised over developers ‘scouting’ the area on the basis of achieving greater profit margins due to local housing market values.

Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested.

The value of development sites and individual plots will be addressed through plan wide and site specific viability assessment.

10. A number of organisations suggested alternative growth options to option 2B.

Other development options will be considered if this is supported by the evidence base.

11. Concerns shared over the impact of growth proposals on Watford General Hospital.

Noted: the provision of health Facilities will be addressed through the IDP and DtC discussions with relevant service providers.

12. Concerns shared over the impact of large growth proposals on Hemel Hempstead on local biodiversity, wildlife and conservation. Impact on existing drainage issues also raise a concern for Hemel Hempstead, particularly water provision.

The, biodiversity, character of settlements, historic environment and the heritage asset(s) value/impact of sites proposed for development (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

Question Number 43

Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

Actions to be taken

13. Concerns raised regarding growth surrounding the Shendish area, with concerns of urban sprawl from Hemel Hempstead having a negative impact on the rural character of Kings Langley.

The, biodiversity, character of settlements, historic environment and the heritage asset(s) value/impact of sites proposed for development (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

Question Number 44	
Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”	
YES	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
1. Various organisations offered support for growth options 1C, 2A, 2B, 2C & 3.	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Other development options will be considered if this is supported by the evidence base.
2. A general consensus indicating that growth should be distributed evenly with due regard for existing and consequential supporting infrastructure.	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Other development options will be considered if this is supported by the evidence base.

Question Number 44

Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

1. **The Chilterns Conservation Board** rejects growth Option 2C as it leads to major development encroaching on the AONB by at Tring. The quality of the AONB setting should be conserved as per paragraph 115 in the NPPF.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

The overall sustainability of the plan will be addressed through the SA/SEA process.

2. **Chiltern & South Bucks District Council** raise concerns about supporting infrastructure requirements needed to support growth outside of the Dacorum Borough boundary. Specific concerns raised over current large travel patterns through Chesham to reach Hemel Hempstead. Other, social infrastructure outside of the local authority boundary also a concern, such as primary schools.

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Highway impacts will be assessed through traffic modelling, including the HCC COMET and Paramics models.

Cross Boundary issues will also be addressed through the DtC process.

Question Number 44

Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

3. **Berkhamsted Town Council** raise concerns that growth option 2C leads to over-development of Berkhamsted and is contrary to settlement aspirations outlined in section 4.

Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.

The vision for the Borough will be developed taking account of the NPPF, local considerations, the responses to the I+O consultation and the Local plan Evidence base.

4. **Markyate Parish Council** state that no further development should be considered in the area until utility provision, specifically water, are improved.

Noted: water supply issues will be addressed through the Local Plan evidence base including the Water Study and addressed through the DtC process. The IDP will also address the provision of water supply.

5. **Tring Town Council** state their support for growth option 1A.

Noted; this will be taken into account in identifying the preferred growth option along with all other representations received and the wider evidence base.

6. **Historic England** share no preference on growth options however ask The Council to consider heritage assets throughout the Local Plan process.

The historic environment and the heritage asset(s) value of sites (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

Question Number 44

Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Key points raised in representations

Officer response

7. **St Alban’s Diocesan Board of Finance** recommend the merging of Options 2A & 3, and consider Growth Option 3.

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Other development options will be considered if this is supported by the evidence base.

8. **Luton Airport** raise concerns over growth proposals within Markyate which fall under consulted flight paths. Reference is made to Action 17 in the LLA Noise Action Plan 2013-2018 in which growth is discouraged if fallen under flight paths, in liaison with Local Authorities. LLA request further involvement if Markyate sites are brought forward.

Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested.

Further discussions with Luton Council can take place under the DtC process; this may also extend to London Luton Airport.

Question Number 44	
Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
9. Berkhamsted Resident Action Group (BRAG) share concerns that growth option 2C leads to significant overdevelopment of Berkhamsted. Concerns raised over Berkhamsted being a target for development and site allocation by developers, as the area has potential for large profit margins due to local housing market values in the settlement.	Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested. The value of development sites and individual plots will be addressed through plan wide and site specific viability assessment.
10. Grove Fields Resident Association (GFRA) share concern that local housing need is too high in growth options 2 & 3. Chiltern’s Countryside Group share concerns that growth options 2 & 3 are premature against current government housing delivery expectations.	Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology. This consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.
11. Various organisations offered support for different, alternative growth options.	Other development options will be considered if this is supported by the evidence base.

Question Number 44	
Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”	
NO	
<i>If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
12. Queries raised over whether a unified approach to growth is being adopted, particularly between Three Rivers and St Albans District Council with DBC.	<p>At the present time each authority within South West Hertfordshire is focussing on meeting its own OAN for additional housing although common ground and issues that have cross boundary implications are being addressed through DtC discussions.</p> <p>In the longer term there are proposals to deliver a Joint Strategic Plan to look at strategic development delivery across the five constituent Councils. This work is at a very early stage and not sufficiently advanced to have a meaningful influence on the formulation and development of the DBC Local plan.</p>
13. Queries raised over whether housing numbers can be shared between authorities.	<p>The advice in the NPPF suggests that Councils should seek to meet their own needs, however, provision is made to accommodate development arising from the OAN of other Council’s where they cannot meet their needs.</p> <p>Any such scenarios and requests would be addressed through the DtC process.</p>

Question Number 45

Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”

YES

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

1. NONE but refer to Appendix XXXX for individual comments

Question Number 45	
Question Text: Is Option 2C your preferred option for delivering the growth needs of the Borough?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
1. Dacorum Environmental Forum Waste Group - the table should be re-worked within the constraints of the lower overall figure given in our reply to No. See reply to Question 16.	Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.
2. Chilterns Conservation Group - The Chilterns Conservation Board objects to this option because it potentially involves major development in the Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8). This option also involves developing multiple sites in the Setting of the AONB at Hemel Hempstead. There is further advice in the Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the AONB.	<p>Noted; the development options will be assessed against the OAN arising from the application of the Standard Methodology.</p> <p>The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.</p> <p>The production of position statements will be considered further as the plan develops.</p> <p>The overall sustainability of the plan will be addressed through the SA/SEA process.</p>

Question Number 45	
Question Text: Is Option 2C your preferred option for delivering the growth needs of the Borough?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
3. Chiltern and South Bucks South Council - Option 3 may not be deliverable in conjunction with the necessary infrastructure is noted and would be a cause for concern to Chiltern and South Bucks.	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary. Highway impacts will be assessed through traffic modelling, including the HCC COMET and Paramics models. Cross Boundary issues will be addressed through the DtC process.
4. Berkhamsted Town Council - No this would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4. This option is incompatible with preserving the character of the market towns and Berkhamsted in particular, which has received a disproportionately large amount of development to date unsupported by improvements in infrastructure.	Noted; these comments will be taken into account in developing the Local Plan. The proposals in the plan will be informed by the full evidence base, SA/SEA process and all other material considerations including the NPPF.
5. Markyate Parish Council - do not believe that any new housing should be considered until the water supply issue is resolved. We do not believe Markyate is appropriate for any further building save to meet local needs.	Noted: water supply issues will be addressed through the Local Plan evidence base including the Water Study and addressed through the DtC process. The IDP will also address the provision of water supply.

Question Number 45

Question Text: Is Option 2C your preferred option for delivering the growth needs of the Borough?

NO

If no, please explain your reasons, with reference to evidence where available.

Key points raised in representations

Officer response

6. **Tring Town Council** - The calculation used, as proposed in the Government's consultation, is unproven and therefore an inappropriate basis upon which to judge housing need. To be sustainable would require a level of infrastructure investment that is unaffordable and non-deliverable.

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

The final plan will be informed by the OAN calculated from the Standard Methodology in the NPPF and supporting PPG guidance.

Other development options will be considered if this is supported by the evidence base.

7. **Historic England** - We do not prefer any growth option at present until further information and analysis has been carried concerning potential heritage impacts.

The historic environment and the heritage asset(s) value of sites (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. This will be supplemented by the DtC process.

8. **Northchurch Parish Council** – no comment but opposes

Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Question Number 45	
Question Text: Is Option 2C your preferred option for delivering the growth needs of the Borough?	
NO	
<i>If no, please explain your reasons, with reference to evidence where available.</i>	
Key points raised in representations	Officer response
9. Luton Airport - LLA are committed to develop and deliver policies, procedures and measures which will help to minimise the effects of aircraft noise and encourage improvements from airlines and other operators. However, an increase in residential dwellings in the Markyate area would potentially increase the number of people who may be impacted upon by aircraft noise. Consider fully the impact that aircraft noise may have upon any new residential dwellings within the noise contour areas. Request that LLA are fully involved in assessing where such new dwellings should be sited, especially in Markyate.	Noted; the identification and allocation of sites will be informed by the weighing and balancing of relevant material planning considerations. This will include potential noise issues but this will be based on evidence rather than a blanket decision as suggested. Further discussions with Luton Council can take place under the DtC process; this may also extend to London Luton Airport.
10. Little Gaddesden Parish Council – No Comment but opposes	Noted; this consultation set out high level options and any proposals for a development strategy and site allocations will be subject to further detailed and site specific assessment to assess deliverability, viability and wider impacts beyond the DBC boundary.

Question Number 46 – (Berkhamsted)	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?	
For the settlement of: Berkhamsted	
<i>If yes, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
1. Thames Water Utilities raise concerns about wastewater drainage capacity for the area	The provision of infrastructure will be addressed through the IDP. The issues will also be pursued through the DtC process.
2. Herts CC concerned about provision for public transport (buses) and viability for new or diverted services	Noted: this will be addressed through the IDP, Plan wide viability assessment and traffic modelling. The issues will also be pursued through the DtC process.
3. Berkhamsted Town Council and Northchurch Parish Council both raise concerns on traffic impact	Noted: this will be addressed through the IDP, Plan wide viability assessment and traffic modelling.
4. Chiltern Society, Chiltern Conservation Board, Berkhamsted Town Council and Northchurch Parish Council all raise concerns impact on landscape and AONB	The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

Question Number 46 – (Berkhamsted)	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?	
For the settlement of: Berkhamsted	
<i>If yes, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.</i>	
Key points raised in representations	Officer response
5. Multiple representations that Be-h3 (Ivy House Lane) unsuitable due to transport/ access issues, environmental impact and implications to green belt/ AONB	Noted: this will be addressed through the IDP, Plan wide viability assessment and traffic modelling. The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.
6. Multiple responses on loss of playing fields at Haslam Fields and proposed replacement being unsuitable due to location – although largely supported by Sport England	The provision of playing fields and other open space will be addressed through the Playing Pitch and Open Space Study. The issue will also be addressed through DtC discussions with Sport England.
7. Strong objection by Chiltern Conservation Board to site Be-h8 as being in the AONB	Noted; this will be taken into account in the assessment of sites including the Greenfield Site Assessment.
8. Many representations on high densities for proposed sites	Noted; site density will be assessed as part of the overall development strategy, Greenfield Site Assessment Study, Urban Capacity Study and site specific assessments.

Question Number 46 - Bovington	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
1. Hertfordshire County Council make reference to multiple areas of concern including mineral extraction, transport, archaeology, and ecology.	DBC will continue to consult with HCC as sites come forward under the emerging Local Plan which will be supplemented by DtC discussions.
2. Thames Water Utilities raise concerns about wastewater drainage within the 4 proposed sites is not adequate.	DBC will continue to consult with Thames Water as sites come forward under the emerging Local Plan. Water Cycle and SFRA studies will inform process. This will also be addressed through DtC discussions
3. Sport England want to ensure that existing infrastructure is maintained within the new developments.	This will be addressed through the Playing Pitch and Open Space Study and further addressed through individual site assessments and site allocations. This will also be addressed through DtC discussions
4. Bovington, Flaunden and Chipperfield Parish Councils all raise concerns regarding how development would affect their areas specifically traffic issues.	DBC will continue to consult with the parish councils and Herts CC regarding traffic issues. This will include DtC discussions with HCC The issue would also be addressed through the COMET and, if appropriate, Paramics Traffic modelling.

Question Number 46 - Bovingdon

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations

Officer response

5. Multiple references to traffic congestion, parking, building in Green belt, provision for health and schooling

The traffic issue would be addressed through the COMET and, if appropriate, Paramics Traffic modelling.

Car parking will be addressed through the evidence gathering and site assessment and supplemented by a new/updated car parking SPD.

The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF.

The needs for additional infrastructure and its provision will be addressed through the IDP.

6. Multiple responses made regarding flooding in Green Lane area (no response from EA)

Noted; this will be addressed through site specific assessment supported by the SFRA part 1 and 2.

7. Concern expressed by Gleeson Developments that land parcel sizes in Stage 2 Green belt Study are far larger than site allocations for Bovingdon and should not be used as a determinative factor in site selection.

The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF.

Question Number 46 Hemel Hempstead

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Hemel Hempstead

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations	Officer response
<p>1. Hertfordshire County Council make reference to multiple areas of concern including mineral extraction, transport, archaeology, and ecology.</p>	<p>Noted: this issues will be addressed in the Greenfield Site Assessment, Urban Capacity Study and wider discussions under DtC.</p> <p>The overall suatainability of the plabn will be addressed through the SA/SEA process.</p>
<p>2. Thames Water Utilities raise concerns about wastewater drainage within the proposed sites is not adequate.</p>	<p>DBC will continue to consult with Thames Water as sites come forward under the emerging Local Plan. Water Cycle and SFRA studies will inform process.</p> <p>This will also be addressed through DtC discussions</p>
<p>3. Sport England want to ensure that existing infrastructure is maintained within the new developments.</p>	<p>This will be addressed through the Playing Pitch and Open Space Study and further addressed through individual site assessments and site allocations.</p> <p>This will also be addressed through DtC discussions</p>
<p>4. Abbotts Langley Parish Council, Redbourn Parish Council and Great Gaddesden Parish Council all raise concerns regarding how development would affect their areas specifically traffic issues and infrastructure impacts.</p>	<p>The traffic issue would be addressed through the COMET and, if appropriates, Paramics Traffic modelling.</p> <p>The needs for additional infrastructure and its provision will be addressed through the IDP.</p>

Question Number 46 Hemel Hempstead

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Hemel Hempstead

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations

Officer response

5. Multiple references (Including Kings Langley & District Residents Association) to site HH-h3 Shendish that it is unsuitable for development. Namely due to transport/access issues, environmental and archaeological impacts, infrastructure requirements its importance as a community asset and the implications it would have on the greenbelt. Similarly there were points raised that there were inaccuracies in ARUP report including that only a small area of the site would be developed and the area highlighted contains some privately owned properties.

The traffic issue would be addressed through the COMET and, if appropriate, Paramics Traffic modelling.

The needs for additional infrastructure and its provision will be addressed through the IDP.

The wider issues raised will be addressed through the evidence base but key will be the Greenfield Site Assessment and any subsequent site specific analysis should the site be identified as having potential for development/allocation.

6. Multiple responses made regarding sites HH-h1a, HH-h1b and HH-h2. Number of issues raised including how this will affect the Piccotts End Conservation Area the impacts to the environment, historic and archaeological parts of the sites. The loss of greenbelt and agricultural land.

The wider issues raised will be addressed through the evidence base but key will be the Greenfield Site Assessment and any subsequent site specific analysis should any or all of the sites be identified as having potential for development/allocation.

The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF.

Question Number 46 Hemel Hempstead	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Hemel Hempstead	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
7. Identification that in the schedule of site appraisals all of the sites promoted were excluded from further assessment.	Noted; however, all sites are being considered through the Greenfield Site Assessment and will be comprehensively reviewed against a range of criteria reflecting the provisions on the February 2019 version of the NPPF in the context of the OAN calculated against the provisions of this version of the NPPF.
8. Chilterns Conservation Board hold objections against the North Hemel sites until further assessment of its impact on the Area of Outstanding Natural Beauty have been completed.	The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

Question Number 46 Hemel Hempstead

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Hemel Hempstead

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations	Officer response
<p>9. Berkhamsted Residents Action Group believe that the Green Belt review has not been accurately carried out, and that sites cannot be allocated until there is robust evidence to approve it. Similarly they raise concerns about the need for a transport plan and SFRA to be conducted before this can happen.</p>	<p>The Green Belt Stage 1 and Stage 2 reviews were carried out in line with current best practice. The veracity of these documents is a matter that can be assessed at the EiP and it is not considered there is justification or need to rerun these studies.</p> <p>Transport modelling will be addressed through the COMET model supplemented by Paramics modelling as necessary. New infrastructure related to highway/transport capacity can be addressed through the IDP. The Part 1 SFRA has been completed and proposed sites highlighted in the Part 1 study will be subject to a further detailed assessment at Stage 2.</p> <p>The overall sustainability of the Plan will be addressed through the SA/SEA process.</p>
<p>10. Leverstock Green Village Association are concerned about the amount of development surrounding them and how the effects of this could be minimised</p>	<p>Noted; this will be addressed through the detailed policies and site allocations.</p> <p>The overall sustainability of the Plan will be addressed through the SA/SEA process.</p>
<p>11. Support for higher density development in Hemel Hempstead, can better accommodate with existing infrastructure</p>	<p>Noted density levels will be addressed through the Greenfield Site Assessment, Urban Capacity and detailed site specific assessment of sites considered to have development potential.</p>

Question Number 46 Kings Langley	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Kings Langley	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
1. Abbotts Langley Parish Council, Chipperfield Parish Council, and Flaunden Parish Council all raise concerns about how development in Kings Langley would impact on their parishes.	Noted; this will be addressed through the evidence gathering and assessment to support the development of the plan. The SA/SEA process will also address this issue.
2. Thames Water Utilities raise concerns on the promoted site in Kings Langley of how waste water would be dealt with and the need to protect an asset under site KL-h3	The provision of infrastructure will be addressed through the IDP. The issues will also be pursued through the DtC process.
3. Hertfordshire County Council- Mineral extraction believe that there should be an assessment to see whether mineral abstraction is necessary on the sites (KL-h3), and whether this can be included as part of planning permission to abstract these before building	Noted; this will be taken into account in the assessment of the suitability of the site for development. If the site is proposed as a development allocation consideration will be given to safeguarding the mineral abstraction and not sterilising the resource through development. The DtC process will also offer an opportunity to address the concerns raised.
4. Hertfordshire County Council- Natural, Historic and Built environment advisory team site KL-h3 has archaeological significance and needs to be assessed.	Noted; this will be taken into account in the assessment of the suitability of the site for development. If the site is proposed as a development allocation, and a full evaluation and mitigation strategy has not been carried out/produced as part of the initial site assessment consideration will be given to addressing the archaeological significance through site specific requirements.
5. Hertfordshire County Council- Transport, Access and Road Safety unit request a transport assessment for bus provisions for the sites.	Noted: transport and movement options and opportunities, including bus service provision, will be addressed as part of the assessment of the suitability of all potential development sites.

Question Number 46 Kings Langley

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Kings Langley

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations

Officer response

6. **Hertfordshire County Council- Herts Ecology** further assessment of the sites as it would result in the loss of farmland which should be offset and there needs to be enhancement along the river and football club (KL-h2)

Noted; this will be taken into account in the assessment of the suitability of the site for development. If the site is proposed as a development allocation, and a full evaluation and mitigation strategy has not been carried out/produced as part of the initial site assessment consideration will be given to addressing the points raised through site specific requirements.

7. Respondents were in strong disagreement with the proposed development of site KL-h3 Wayside farm on the grounds that it is an important site for maintaining settlement character and provides a community asset through the farm on the site and used for leisure purposes. Respondents also raise issues that the transport capacity and necessary infrastructure to support development here is lacking and could not sensibly be improved. Similarly they raise concerns about ecology and flooding issues on the site.

Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.

The detailed analysis will take account of the Local Plan Evidence base, the representations received and any matters raised through DtC discussions with relevant expert/specialist bodies.

8. Respondents were against the proposals for development on site KL-h1 Hill Farm on the grounds that accessibility was a big issue specifically encouraging active travel, and ensuring that road access to the site was safe and practical. Some respondents also raised concerns about wildlife on the site.

Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.

The detailed analysis will take account of the Local Plan Evidence base, the representations received and any matters raised through DtC discussions with relevant expert/specialist bodies.

Question Number 46 Kings Langley	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Kings Langley	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
9. Respondents disagree with the proposals for the development of site KL-h2 because this site is a flood risk with its proximity to the Grand Union canal and also serves as an ecological/wildlife area, and has good quality farmland (which is used for local food production by Transition for Kings), and that development here would worsen congestion.	<p>Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.</p> <p>The detailed analysis will take account of the Local Plan Evidence base, the representations received and any matters raised through DtC discussions with relevant expert/specialist bodies.</p>
10. Kings Langley Community Benefit Society and Transitions for Kings support the development of site KL-h2 to provide affordable housing on the brownfield part of the site and to provide a community amenity site providing land could be offset from the Sunnyside Rural Trust	<p>The provision of affordable housing on any development site will be addressed through the detailed assessment of the site against the Local Plan Evidence base.</p> <p>The provision of affordable housing will be addressed through the LHNA.</p> <p>Amenity space will be addressed through the IDP and the Playing Pitch and Open Space Study.</p>
11. Concerns made by numerous respondents about the impacts of development on Kings Langley specifically the changes or loss of character, that the locations chosen create unsustainable growth, and that the numbers proposed do not cater for their own housing need based on previous studies.	<p>The wider issues raised will be addressed through the evidence base but key will be the Greenfield Site Assessment and any subsequent site specific analysis should the site be identified as having potential for development/allocation.</p> <p>The overall sustainability of the plan and any proposed allocations will be addressed through the SA/SEA process.</p>

Question Number 46 Kings Langley	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Kings Langley	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
<p>12. The Chilterns society raise concerns that about the access, conservation and listed buildings on KL-h1 and that an assessment of the village's capacity should be considered. They believe that site KL-h2 is a flood risk and that development here would go against Green belt principles. Site KL-h3 would also go against the Green belt principles and narrow the gap between Watford and Kings Langley</p>	<p>Greenbelt issues will be considered against the Part 1 and Part 2 Green Belt studies.</p> <p>Flood risk will be addressed through the Strategic Flood Risk Assessment Part 1 and Part 2 (if appropriate).</p> <p>The wider issues raised will be addressed through the evidence base but key will be the Greenfield Site Assessment and any subsequent site specific analysis should the site be identified as having potential for development/allocation.</p> <p>The overall sustainability of the plan and any proposed allocations will be addressed through the SA/SEA process.</p>

Question Number 46 Markyate	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it? Markyate	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
1. Chilterns Conservation Board object to the development of both sites in Markyate on the grounds that this would negatively impact on the Chilterns Area of Outstanding Natural Beauty	The potential impact of development on the CAONB (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.
2. Thames Water Utilities are concerned that the wastewater capacity is not suitable for the proposed levels of development on site My-h1. Consultation with developer, inclusion of plans as part of the application process.	The provision of infrastructure will be addressed through the IDP. The issues will also be pursued through the DtC process.

Question Number 46 Markyate

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it? Markyate

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations

3. **Markyate Parish Council, the Chiltern Society** raise concerns about both of the sites promoted. Site My-h1 and its location next to the river Ver and the potential of pollution into the river. They also believe this site is too far from the village centre and would increase car use. Site My-h2 is impractical due to the topography of the area and would not encourage active travel, there is a lack of facilities and this site is important in protecting the Green Belt and Area of Outstanding Natural Beauty. There could be provision for a new care home at Caddington Hall, combined with road widening to improve road safety.

Officer response

Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.

The detailed analysis will take account of the Local Plan Evidence base, the representations received and any matters raised through DtC discussions with relevant expert/specialist bodies.

The potential impact of development on the CAONB (including setting issues) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

The overall sustainability of the plan and any proposed allocations will be addressed through the SA/SEA process.

Question Number 46 Markyate	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it? Markyate	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
4. Hertfordshire County Council do not believe that site My-h2 is a good location for housing, however they believe that a limited amount is acceptable.	Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review, in whole or in part, following the initial Study the points raised will be addressed in greater detail. The detailed analysis will take account of the Local Plan Evidence base, the representations received and any matters raised through DtC discussions with relevant expert/specialist bodies.
5. Herts Ecology raise concerns that both sites could have ecological significance and this needs to be investigated further.	Noted; this will be taken into account in the assessment of the suitability of the site for development. If the site is proposed as a development allocation, and a full evaluation and mitigation strategy has not been carried out/produced as part of the initial site assessment consideration will be given to addressing the points raised through site specific requirements.
6. Support for the development of My-h1 as this could provide physical and social infrastructure for the area and has limited constraints.	Noted; the provision of infrastructure will be addressed through the IDP supported by the Plan Wide and/or site specific Viability Assessment.
7. Concern as the proposal of site My-h2 does not fall within Markyate boundary	Noted: this will be taken into in the assessment carried out in the Greenfield Site Assessment Study.
8. Concern about site My-h2 and its proximity to Beechwood Park school and the traffic implications	Noted: this will be taken into in the assessment carried out in the Greenfield Site Assessment Study.

Question Number 46 Markyate	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it? Markyate	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
9. Site My-h2 would not be in keeping with the settlement character, as the proposed density levels are too high.	Noted: this will be taken into in the assessment carried out in the Greenfield Site Assessment Study.

Question Number 46- Tring	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note, which accompanies it? Tring	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
1. Sport England raise concerns about the development of site Tr-h5 and sports provision. Playing pitch strategy already identifies that more provision is needed here and development on this site would prevent this from happening. Similarly, they raise concerns about the loss of a football pitch on site Tr-h6 if development were to come forward.	<p>This will be addressed through the Playing Pitch and Open Space Study and further addressed through individual site assessments and site allocations.</p> <p>This will be addressed through the Greenfield Site Assessment, Urban Capacity and detailed site specific assessment of sites considered to have development potential.</p> <p>This will also be addressed through DtC discussions</p>
2. Chilterns Conservation Board raise objections to all of the sites on the grounds that they would impact on the Chilterns Area of Outstanding Natural Beauty. They believe that an assessment on each site should be carried out to reflect this impact in a similar way to the Green Belt Review.	The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.

Question Number 46- Tring	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note, which accompanies it? Tring	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
<p>3. Aldbury Parish Council disagrees with the proposal for the development of site Tr-h1 because it complies with the Green Belt policy and maintains separation from the Chilterns Area of Outstanding Natural Beauty. Concern that the infrastructure and transport related issues have not been considered and that development of sites Tr-h1-h3 would be detrimental to the community.</p>	<p>The potential impact of development on the CAONB (including setting issuers) will be assessed through the Greenfield Site Assessment and further reviewed as part of the detailed work on any proposed site allocations. Any sites within the Green Belt that may be proposed for development in the setting of the CAONB will be considered for review through the LVIA process.</p> <p>The need to use Green Belt land will be informed by the Urban Capacity Study, Greenfield Site Assessment and the Green Belt Reviews. Any proposals for development in the Green Belt will also be considered against the policy and provisions of the NPPF.</p> <p>These issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.</p> <p>Infrastructure matters will be addressed through the IDP.</p>

Question Number 46- Tring	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note, which accompanies it? Tring	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
4. Tring Town Council suggest that any development would need to provide the infrastructure to support it without impacting on the character of the settlement. Believe that based on their locally assessed housing need only 300 homes should be built on site Tr-h5 based on the existing allocation on LA5. Ask for Tr-h5 to provide more affordable housing, employment and retail space.	<p>Noted: since the I+O document was produced and consultation was carried out the revised NPPF which includes the Standard Housing Method to calculate OAN has been published (February 2019). The OAN under the Standard Methodology for Dacorum is 1025. The NPPF expects this figure to be met as a minimum unless there is compelling evidence to set a different lower figure.</p> <p>The Site Assessment Study will look provide an overview of all sites including any designations or potential impacts on the setting of the AONB. The SA/SEA will also address this issue.</p> <p>Infrastructure matters will be addressed through the IDP.</p>
5. Aylesbury Vale District Council raise concerns about the development of Tr-h6 and how this could potentially be extended to the point whereby it would negatively impact on the visuals and landscape in their authority.	<p>These issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail. The scale of the site will also be addressed through the study including the possibility of increasing or reducing the size of site Tr-h6</p> <p>Infrastructure matters will be addressed through the IDP.</p>
6. Thames Water Utilities concerns about all of the sites promoted at Tring and would like to be consulted about the wastewater capacity.	<p>The provision of infrastructure will be addressed through the IDP.</p> <p>The issues will also be pursued through the DtC process.</p>

Question Number 46- Tring	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note, which accompanies it? Tring	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
7. Hertfordshire County Council- Development Services, property and resources are in support for the development of Tr-h5 due to the possibility, of school provision, economic growth and promoting active travel.	Noted; these comments will be taken into account as part of the Greenfield Site Assessment Study.
8. Hertfordshire County Council- Natural, Historic & Built Advisory team would like to see an archaeological assessment carried out on all of the sites and that they need to be protected even if they are not designated, possibility to include this as part of the pre-application process.	Noted; this will be taken into account in the assessment of the suitability of the sites for development through the Greenfield Site Assessment Study. If the site is proposed as a development allocation, and a full evaluation and mitigation strategy has not been carried out/produced as part of the initial site assessment consideration will be given to addressing the archaeological significance through site specific requirements.
9. Hertfordshire County Council- Transport, Access and Road Safety Unit raise concerns about bus stop provisions for the sites and the walkability to them. Specific concern raised for site Tr-h3, Tr-h5, and Tr-h6.	Noted: transport and movement options and opportunities, including bus service provision, will be addressed as part of the assessment of the suitability of all potential development sites.
10. Hertfordshire County Council- Herts Ecology are concerned that there is a need to further assess the sites for any ecological significance, and whether there may be need for SANGS or Biodiversity contributions.	Noted; this will be taken into account in the assessment of the suitability of sites for development. If the site is proposed as a development allocation, and a full evaluation and mitigation strategy has not been carried out/produced as part of the initial site assessment consideration will be given to addressing the points raised through site specific requirements.

Question Number 46- Tring	
Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note, which accompanies it? Tring	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
11. Grove Fields Residents Association raise concerns about the release of Green Belt land and that this should not be considered until housing numbers have been agreed with St Albans. Need to be assessed against the Green Belt purposes in the NPPF and agricultural land classification system of which many of the sites meet these requirements.	<p>Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.</p> <p>The detailed analysis will take account of the Local Plan Evidence base, the representation s received and any matters raised through DtC discussions with relevant expert/specialist bodies.</p> <p>The overall sustainability of the plan and any proposed allocations will be addressed through the SA/SEA process.</p> <p>The overall housing numbers will be determined through the OAN determined using the Standard Methodology in the NPPF and supporting PPG.</p>
12. Respondents raise concerns about the development of the sites and its impact on the settlement character in Tring, and the loss of leisure/ accessible land.	Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.

Question Number 46- Tring

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note, which accompanies it? Tring

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations

Officer response

13. Respondents raise concerns accessibility and highways capacity on site Tr-h2, and how these issues would be addressed.

Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.

Transport issues will be addressed through the DtC process and supported by the COMET and where necessary Peramics Modelling.

14. Concern from a number of respondents about the proposed development on Tr-h4 and Tr-h5 specifically the proposal for this site to include warehousing.

Noted; these issues will be addressed through the Greenfield Site Assessment Study. Should the site be considered suitable for further review following the initial Study the points raised will be addressed in greater detail.

The need for any particular form of employment related development will be informed by the Economy Study.

Question Number 46 – Sustainability Assessment Focussed Points

Question 46: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?

If yes, please make it clear to which site(s) your comments relate and refer to evidence where available.

Key Points raised in representations

Officer response and/or further actions

Historic England

Provided advice and guidance relating to Site Allocations and Assessing Sites.

Comments on specific sites included below in the relevant part of the table.

Comments noted, including those specific to some individual sites.
The comments will be taken into account during the next stages of SA.
Guidance and advice relating to Site Allocations and Assessing Sites will also be taken into account.

Chilterns Conservation Board (CCB) – reiterated by individual respondent

The Chilterns Conservation Board objects to the allocation of sites in the AONB Tr-h4 and Be-h8 and makes a holding objection to all the sites in the setting of the Chilterns AONB, pending proper assessment of the impact of developing the sites on the AONB:

- Hemel Hempstead: HH-h1a; HH-h1b
- Berkhamsted: Be-h3; Be-h4; Be-h5; Be-h7; Be-h8
- Tring: Tr-h1; Tr-h2; Tr-h3; Tr-h4; Tr-h5; Tr-h6
- Markyate: My-h1; My-h2
- Other Settlements: O-h1

The Schedule of Site Appraisals Sustainability Appraisal Working Note is flawed because being in the setting of the

Comments noted.
The potential effects on the AONB and its setting will be considered further during future stages of SA. This will be informed by the findings of LVIA.
The granularity of the assessment methodology means that a single score (e.g. minor adverse) covers a range of potential effects – it does not mean that the effects between sites with the same score are exactly the same.

<p>AONB has been given no greater weight than sites outside the AONB setting. For example, sensitive AONB setting sites like Be-h3 Land at Ivy House Lane has been scored exactly the same (one orange cross: "the option is likely to have a negative effect which is not significant") under SA9 Landscape as sites further distant from the AONB at Kings Langley or Bovington.</p>	
<p>Chilterns Countryside Group – reiterated by individual respondent</p> <p>Assessment of the sites in the 'Sustainability Assessment Working Note' December 2017 does acknowledge the AONB and cumulative effects such as increased traffic, air and noise pollution caused by potential expansion of London Luton and Heathrow airports. However, the CCG does not find the assessment outcome of these to be balanced in terms of negative/positive impact.</p> <p>The CCG does not accept DBC's assessment (Working Note p35-9) of landscape sensitivity for Tr-h1 (land at Station Road, Tring), Tr-h2 (land West of Marshcroft Lane, Tring), and Tr-h3 (land at Icknield Way/Grove Road, Tring) as being less than for Tr-h4 (land at Cow Lane, Tring). The proximity of all 4 sites to the AONB makes each significant in negative impact to the landscape should they be developed.</p> <p>The representation from CCG also makes references to the CCB Position Statement on '<i>Development affecting the setting of the Chilterns AONB</i>'.</p>	<p>Comments noted.</p> <p>The potential effects on the AONB and its setting will be considered further during future stages of SA. This will include reference to the CCB Position Statement.</p>
<p>Herts CC</p> <p>Natural, Historic & Built Environment Advisory Team consideration of the archaeological implications of the proposal sites</p>	<p>Comments noted.</p> <p>The SA objective for the historic environment (SA8) does not differentiate between designated and undesignated heritage sites</p>

<p>The Schedule of Site Appraisals Working Note Framework in Appendix A, section 8 fails to acknowledge that a heritage asset does not necessarily need to be designated or identified in the local plan to warrant conservation. It should do so because NPPF paragraph 139 notes that if it has been demonstrated that a heritage asset has equivalent significance to a scheduled monument then it should be treated in the same way (NPPF paragraph 139). It should also do this because one of the objectives of section 8 is to identify heritage assets. If these are currently unidentified then their significance is not known and it may be sufficient to be considered under NPPF paragraph 139. We have undertaken a rapid appraisal of the archaeological implications of development for the areas identified in the consultation.</p>	<p>assets. The SA therefore considers the potential effects against all heritage assets.</p> <p>The site specific information provided by Herts CC in relation to archaeology and transport access will be taken into account at the next stage of the sustainability appraisal.</p>
<p>Herts Ecology</p> <p>Key Environmental Designations are primarily of legal or national significance; whilst these may influence fundamental constraints, they do not reflect the majority of recognised valuable biodiversity resources present within the district which are recognised as Wildlife Sites (WS). Ancient semi-natural woodland is highlighted; why? Ancient Woodland is referred to in NPPF. Also, most ASNW has no statutory or national or otherwise recognition. Its inclusion in the AW inventory is no different to any other habitat inventory subsequently generated by NE. However, Wildlife Sites should have been included within other(s) environmental designations. These will embrace AW as well as 'biodiversity' referred to in NPPF. (However, appraisals do appear to have identified WS if present).</p>	
<p>Individual respondent</p> <p>There are major issues with the Sustainability Appraisal across many of the sites. There are currently major problems with</p>	<p>The SA identified that the sites with access to public transport, or where public transport improvements would be provided, were the most sustainable.</p>

<p>infrastructure which seemed to be completely disregarded. An example is the A4251 between the A41 /M25 junction and Two Waters Hemel Hempstead. It is disingenuous to think that cycling/walking/public transport will prevail. This would be both dangerous and unpleasant because of the current gridlock levels of congestion and pollution resulting from previous developments in the area. Social facilities/education /employment are not locally positioned and nothing in the plans will provide for these essentials.</p>	<p>Issue 5 in the Issues and Options document considered the issues relating to roads, transport and accessibility that should be addressed in the new Local Plan. The SA will consider these issues in more detail as the Plan is developed further.</p>
<p>Individual respondents</p> <p>The approach of providing individual site assessments does not pick up on the cumulative effects that would result if all the sites in a given settlement were to be developed.</p> <p>Whereas a particular single site might be deemed to have an insignificant negative impact, the cumulative effect of several sites could have a significant negative impact on, for example, roads, water, schooling etc. it is the cumulative impact of development past, present and that proposed in the immediate and neighbouring areas on which should be assessed. This is particularly the case for Berkhamsted and Tring which have many “negative but not significant” sites, many of which are in close proximity to one another and to ongoing and planned developments. Suggestions throughout that provision of housing “could help the local economy and encourage provision of local services” and that development of sites “could help to maintain community vibrancy and vitality” totally ignores the topography of Berkhamsted and Tring. More houses will mean quite the opposite with increased congestion, reduction in commercial viability of existing commercial and retail centre of the town, a diminished attraction to tourists and</p>	<p>As described in the Introduction to the Schedule of Site Appraisals “<i>The Schedule of Site Appraisals sets out the Council’s initial appraisal of a number of larger potential new allocations, although at this stage it does not make any recommendations as to whether they should be taken forward or not.</i>”</p> <p>The aggregate number of dwellings for the sites in the schedules for each settlement are higher than the numbers which would be required under Options 1a, 1b, 1c, 2c and 3. The SA working Note therefore provides an assessment of each of the sites in isolation. The cumulative effects will be taken into account when the sites and groups of sites to be taken into the Local Plan are considered.</p>

<p>a change from successful vibrant markets town to traffic jammed places to avoid.</p> <p>The previous Core Strategy rejected a number of sites giving detailed reasons for rejection – yet just a few years later Dacorum are ignoring these reasons without explanation and putting these very sites forward for development. The reasons previously given for rejection still hold good. There is a limit to expansion, and simple maths deriving a high housing needs figure does not justify trying to squeeze more into the parts of Dacorum which are simply unsuited and inappropriate for development.</p>	
<p>Individual respondent</p> <p>The assessments of individual sites are over-simplified and lack any real analysis of the impact they may have on the specific areas in which they are situated.</p>	<p>The SA identifies the main constraints and opportunities for each site against the 15 SA objectives. It is not the role of the SA at this stage to undertake a detailed assessment for each site.</p>
<p>GENERAL SA/SEA understates the effect that building approx. 11k new homes in Dacorum would have on the environment: directly through loss of green space and good agricultural land/woodland plus increase in population and therefore traffic. Dacorum roads already struggling to cope, with main arterial roads M1, M25 often at a standstill Much of the area is serviced by smaller A roads and country lanes; not designed to cope with heavy traffic. Sink holes and narrow, poorly-lit lanes mean the proposed development site is impractical No indication/evidence of safe walking/cycling routes being created. People will inevitably use their cars to travel and with a conservative estimate of 2 per household, that's 22k extra vehicles. Greenbelt sites are being considered when there are a significant number of brown belt sites or sites around Hemel that already have the necessary infrastructure in place. Examples: field opposite Gadebridge Park with existing</p>	<p>The SA of the Issues and Options document identified the potential adverse effects on the environment objectives that would be associated with high levels of new development across the Borough.</p> <p>See responses relating to Question 1.</p>

<p>housing and flats; Warners End - various large green open spaces amongst dense housing and a secondary school. I am unaware of the existence of evidence that the Dacorum area actually needs the high number of houses listed in the three options. It is not only Option 3 that will impact adversely on existing residents, water quality, soil, infrastructure, environment, air pollution, climate change, and schools. All of the options for additional housing in Dacorum will adversely affect an already overloaded road and rail network.</p>	
<p>BERKHAMSTED SITES</p>	
<p>Berkhamsted Citizens Association reiterated by individuals</p> <p>The cumulative effects of developments have not been assessed thus undermining any conclusions made Berkhamsted has the most “negative but not significant” sites many of which are in close proximity to one another and to ongoing and planned developments</p>	<p>As described in the Introduction to the Schedule of Site Appraisals “<i>The Schedule of Site Appraisals sets out the Council’s initial appraisal of a number of larger potential new allocations, although at this stage it does not make any recommendations as to whether they should be taken forward or not.</i>”</p> <p>The aggregate number of dwellings for the sites in the schedules for each settlement are higher than the numbers which would be required under Options 1a, 1b, 1c, 2c and 3. The SA working Note therefore provides an assessment of each of the sites in isolation. The cumulative effects will be taken into account when the sites and groups of sites to be taken into the Local Plan are considered.</p>
<p>Individual respondent</p> <p>The methodology purports to show a quasi-scientific weighting to provide a grading of the ‘value’ of areas that have hitherto enjoyed blanket Green Belt designation. The objective appears to be to undermine their status and hence be designated for development, soon or in the future.</p>	<p>The assessment of sites used a standard SA methodology to identify the key constraints and potential opportunities that would be associated with development of the site.</p> <p>The SA considered that the provision of local centres would help to provide day-to-day needs and thereby reduce the need to travel.</p>

<p>Focusing on observations made for Berkhamsted, there is inconsistency viz. comparing the SA11 [sustainable location] designation for Haslam Fields being non-sustainable and the South Berkhamsted land [even less sustainable] but wrongly designated 'sustainable' as the land owner is tabling a local centre: this has a very low probability of being viable and commercially sustainable. The comment - "The option is likely to have a negative effect which is not significant" is attached to more sites in Berkhamsted than elsewhere. It is understandable that local residents are highly sceptical believing the statement provides convenient cover to relax designation as Green Belt. Moreover, nowhere is there any consideration of the cumulative impact on the Town of the prospective developments over time: sites that are close to each other should not be assessed as standalone developments – particularly as they share the same roads/junctions and make cumulative demands on local services, schools and shops.</p>	<p>In relation to the comment on cumulative effects, see response for representation by Berkhamsted Citizens Association above.</p>
<p>Be-h1: Land south of Berkhamsted</p>	
<p>Herts Ecology Sustainability Appraisal: Loss of agricultural ecology and potential impact on WS is locally negative on this aspect and should be reflected thus, although this may not be significant to other aspects of the development as a whole.</p>	<p>Noted. The SA identifies these potential minor adverse effects against the biodiversity and soils objectives</p>
<p>Individual respondent Important issue – TRL states "The scale of development at this site is out of scale with employment opportunities in Berkhamsted and therefore it is likely that many of the new dwellings will be occupied by commuters to other towns/areas for work. Whilst the site is situated within 2km of the railway station there remains the likelihood that a high proportion will</p>	<p>The methodology used for the SA works under the assumption that additional housing will help to support the local economy.</p>

<p>commute to work or make their journey to the station by private car.”</p> <p>Suggestion that “this increased number of resident in the town would make facilities and shops more viable” – they have already identified the difficulties in accessing the town and facilities – will either massively increase congestion and drive away business from the town – or will commute out and use other towns and facilities – in either case providing NO ‘sustainable Prosperity’ to Berkhamsted</p> <p>Impact on wildlife – reduction on wildlife corridor – forcing wildlife to cross A41 – TRL recognises loss or damage to habitats including Long Green wildlife site and Brickhill Green wildlife site</p>	
<p>Be-h2: Haslam Fields, Shootersway</p>	
<p>Herts Ecology</p> <p>Sustainability Appraisal: Loss of grassland ecology is locally negative on this aspect and should be reflected thus, although this may not be significant.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats.</p>
<p>Berkhamsted Schools Group</p> <p>Consider that the site offers the opportunity to provide very significant biodiversity enhancement on adjacent land totalling 2.7 hectares. The potential environmental benefits of allocating the Haslam Fields far exceed its modest size.</p> <p>SA12 Sustainable locations – Disagree with assessment. Consider that the Haslam Fields site is in a sustainable location. The site is in an accessible location, on the edge of the existing built up area of Berkhamsted. It is within easy reach of local shops and services and the High Street can be reached by foot in 13 minutes and by cycle in only 3 minutes.</p>	<p>Noted.</p> <p>Comments relating to individual sites will be taken into account if the site is considered during further stages of plan making and SA.</p>
<p>Be-h3 Ivy House Lane</p>	

<p>Herts Ecology Sustainability Appraisal: This could be a neutral impact. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Individual respondents Comments/concerns on the information and assessments provided in the SA Working Note. There is no numerical credit rating given to the various features of the site as weighed against other potential sites as set out in the Ove Arup Green Belt Stage 2 report and could have been released as an alternative. The consultant reviews and initial screening of the options is superficial and confirmation biased. There needs to be a robust comparable assessment of sites which acknowledges past conclusions and where there has been no material change since that conclusion. The sustainability report underscores the difficulties in developing this site and fails to take into account the constraints of urban bulk, highway access and isolation from public transport and ability to utilise or improve public transport. Points relating to the specific SA Objectives included: SA1 Biodiversity: proposed development would have a significant negative effect due to loss of habitat SA2 Water: assessment should be a significant negative. Surface run-off issues. Water supply and wastewater treatment issues. SA3 Flood risk: the lowest part of this land floods regularly SA4 Climate change: Topography and distance severely limit cycle access to the town and its schools and other amenities.</p>	<p>Noted. Comments relating to individual sites will be taken into account if the site is considered during further stages of plan making and SA.</p>

<p>Very limited bus service and not footpath to bus stops. Site not 'relatively close' to the station.</p> <p>SA5 Air quality: assessment should be a significant negative. Car usage will be significant.</p> <p>SA6 Soils: assessment should be a significant negative. Proposal fails to safeguard high quality and productive arable land</p> <p>SA9 Landscape/Townscape: assessment should be a significant negative. There is a strong visual and physical link between the site and the open (CAONB) countryside. Light pollution issues.</p> <p>SA10 Health and wellbeing: assessment should be a significant negative</p> <p>SA11 Sustainable locations: the site has poor accessibility to local facilities especially primary schools</p> <p>SA12 Community cohesion: assessment should be a significant negative. Site will provide no additional facilities to offset its construction.</p> <p>SA13 Housing: assessment should be a negative. Covenants restrict the type of development to detached houses on 1/3 of an acre plots.</p> <p>SA14 Sustainable prosperity: assessment should be a significant negative. This scheme will not achieve any more than would be offered elsewhere in the Dacorum Area.</p> <p>SA15 Employment and skills: This scheme will not achieve any more than would be offered elsewhere in the Dacorum Area.</p>	
<p>Be-h4 Land between Durrants Lane / Bell Lane / Darr's Lane (two sites)</p>	
<p>Herts Ecology</p>	<p>Noted.</p>

Sustainability Appraisal: This could be a neutral impact.	The SA identifies potential minor adverse effects through loss of habitats.
<p>Individual respondents</p> <p>Disagree with the SA Working Note comments that the site is located relatively close to a number of local shops and that the site has the potential to support a bus service to serve this part of the town.</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
<p>Taylor Wimpey</p> <p>The assessment of sites in Berkhamsted suggests there are inconsistencies in the assessment of some criteria. For example, site Be-H1 receives a score of '✓/✗' in respect of ecology since that site proposes ecological enhancements. Land at Darrs Lane and Bell Lane (site Be-H4) receives a '✗' on this criterion, yet it presents a significant opportunity to secure net gains in biodiversity, strengthening the existing Green Infrastructure. In this context, we consider the site should receive a '✓' for this criterion. Furthermore, work is being undertaken in respect of heritage interest on the site; this is expected to be incorporated into the masterplan for the site meaning that heritage impacts can be mitigated and a neutral score of – can be given. The SA assessment indicates that Be-H4 is one of the stronger performing sites in Berkhamsted and although we acknowledge the site is subject to certain constraints there is the clear opportunity to secure positive outcomes at the site for a range of different issues. This is reflected in the site jointly scoring the second-highest number of '✓' scores – six in total. The only site which scores more '✓s' is constrained by flooding issues.</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
Be-h5 Land at Lockfield, New Road, Northchurch	
Herts Ecology	Noted.

<p>Sustainability Appraisal: Assessment appears reasonable. The SAC issue is an additional consideration.</p>	<p>The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Individual respondents</p> <p>Cannot agree with the sustainability assessments, which appear to be mere tick box exercises, with very little understanding and appreciation of the locations assessed. For example when the assessors talk about facilities at the centre of Northchurch, what can they mean? There is a small Tesco store outside which there is daily chaos with the number of people parking and trying to get to the shop. There is a small time-limited parking area, but there is no parking enforcement. The school has recently been enlarged to cope with the current population of children.</p> <p>In evaluating the viability of this site you addressed a number of SA Objectives.</p> <p>1. 'Biodiversity' consider that the negative effect will in fact be significant. Rather than provide wildlife corridors and buffer areas, this development will take one away, which is currently situated between the canal and the railway. The trees, hedgerows and other natural habitat for wildlife will disappear, not be protected and as the site is so close to the canal there may be contamination of the watercourse too.</p> <p>4. 'Climate Change' disagree that development of this site will have a positive effect. This site does NOT encourage the use of sustainable modes of transport. This route does not encourage walking. Neither does it encourage cycling, for the same reasons: the road is narrow, there is no cycle path (or space for one).</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>

<p>10. 'Health & wellbeing' Increased traffic and associated congestion will mean that if residents choose to walk or cycle they will be exposed to the fumes of the queuing cars.</p>	
<p>Be-h6 Land adj. to Blegberry Gardens, Shootersway</p>	
<p>Herts Ecology Sustainability Appraisal: This could be a neutral impact.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats.</p>
<p>Crest Nicholson Concerned that the methodology used in the SA Working Note is too simplistic and broad brush and that it is not consistent with assessments for other sites in Berkhamsted. Matters such as 'air quality' require a detailed site specific assessment. SA3 Flood risk – consider that c flood risk constraints should be afforded more weight than some other SA objectives. SA8 Historic environment – assessment flawed, falling far short of an assessment of the key factors, and need for appropriate weighting, identified in the NPPF SA9 Landscape - the assessment fails to even provide any distinction between those within an AONB and those which are not SA4 Climate change; SA5 Air quality; SA10 Health and wellbeing; and SA11 Sustainable locations – concerned that Be-h6 has not been assessed to the same level of detail as the other sites in Berkhamsted. To investigate transport issues Crest Nicholson commissioned a Transport Strategy. Based on the findings and given that there could be public transport improvements consider that Be-h6 warrants higher scores against these objectives.</p>	<p>Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA. With regard to the assessments for SA9 Landscape, the SA Working Note did identify that site Be-h8 was in the AONB, with a significant adverse effect been attributed. It also identified that site Be-h3 was adjacent to the AONB.</p>
<p>Be-h7 Land at Bank Mill Lane</p>	

<p>Herts Ecology Sustainability Appraisal: Assessment appears reasonable. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Audley Court Ltd Agree that development on the site will have a positive effect on the following: Climate Change; Health and Wellbeing; Sustainable Locations; Community Cohesion; Housing; Economy; and Employment The northern half of the site is located within Flood Zones 2, 3a and 3b with the rest of the site being located within Flood Zone 1, however from our initial Flood Risk Assessments, we do not agree that development of the site will cause a “significant negative effect” on flood risk and consider that this can be effectively managed on site.</p>	<p>Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
<p>Be-h8 Berkhamsted Golf Range, The Brickworks, Spring Garden Lane</p>	
<p>Herts Ecology Sustainability Appraisal: This could be a neutral impact.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats.</p>
<p>Majesticare Limited The schedule of site appraisals SA working note correctly identifies that development at the site Be-h8 will have a positive effect on: Community cohesion; Housing; Economy; and Employment 10. However, we strongly disagree that the site will have a significant negative effect on landscape or a negative effect on biodiversity or soils. The SA working note states that the development of the site would have an effect on the character of the AONB designation, but our initial landscape research and assessment suggests that the site</p>	<p>The significant adverse effect identified for the landscape objective reflects the fact that the site is located within the Chilterns AONB. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>

<p>could be developed in a sympathetic manner to accommodate a high quality care home that would enhance the local landscape.</p>	
<p>BOVINGDON SITES</p>	
<p>Taylor Wimpey</p> <p>The assessment of sites in Bovingdon is generally supported and considered accurate. It is noted that land at Homefield (Bov-H2) is the joint strongest performer against the assessment criteria, jointly with land at Duckhall Farm (Bov-H4). However, the Sustainability Appraisal does not take Green Belt considerations into account, nor does it take into account the specific proposals for each site or the deliverability of development. In this context, land at Homefield emerges as an eminent candidate for allocation in Bovingdon, as set out within our Site Promoter Document.</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p> <p>The presence of Green Belt is a planning designations and is not a sustainability factor that is included in the SA Framework. Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies. This approach is consistent with all the previous sustainability appraisal on the Core Strategy and Site Allocations DPD. The SA Framework includes objectives relating to the conservation and enhancement of the landscape in the Borough which guide the assessment in relation to landscape issues. The SA Framework has been consulted on at several stages and there have been no requests to add objectives relating to Green Belt.</p> <p>Green Belt issues have been explored through the Part 1 and Part 2 Green Belt Studies and will be further addressed in the Greenfield Site Assessment Study</p>
<p>Individual respondent</p> <p>Sustainability does not seem to have been thought through at all. The Local Plan is supposed to consolidate all our fragmented ideas into a single coherent and sustainable plan to 2036 – i.e. the next 20 years. The Sustainability report has jumped straight to a list of sites offered up by opportunistic local landowners with no reference to securing sites for the critical healthcare, schooling, local traffic and infrastructure to</p>	<p>The SA Working Note for the Schedule of Site Appraisals provides an assessment of each of the sites included in the Schedule.</p> <p>The separate SA Working Note for the Issues and Options document provides an assessment of the options relating to the Local Plan.</p>

promote sustainable growth - the stated need for the Plan. The process of identifying sites should start with this as prerequisite for all choices of site rather than a random bunch of sites in areas already without a sustainable platform to grow	
Bov-h1 Land at Grange Farm, Green Lane, Bovingdon	
Herts Ecology Sustainability Appraisal: This could be a neutral impact.	Noted. The SA identifies potential minor adverse effects through loss of habitats.
Bov-h2 Land south east of Homefield	
Herts Ecology Sustainability Appraisal: Assessment appears reasonable but could be neutral.	Noted. The SA identifies potential minor adverse effects through loss of habitats.
Bov-h3 Land r/o Green Lane / Louise Walk	
Herts Ecology Sustainability Appraisal: Assessment appears reasonable but could be neutral.	Noted. The SA identifies potential minor adverse effects through loss of habitats.
Bov-h4 Land at Duckhall Farm, Newhouse Road	
Herts Ecology Sustainability Appraisal: Assessment appears reasonable – potential significant impact if not addressed as necessary.	Noted. The SA identifies potential adverse effects through loss of habitats. Further assessment of potential ecological impacts will inform the next stage of the SA.
HEMEL HEMPSTEAD SITES	
Individual respondent Concerns that developments would reduce habitat connectivity.	Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.
HH-h1a North Hemel Hempstead (Phase 1)	
Historic England	Noted.

<p>Site HH-h1a at North Hemel Hempstead would immediately abut the small settlement of Piccotts End, which contains a conservation area, Gadebridge Roman villa a scheduled monument, the Grade I listed 130-136 Piccotts End, Grade II* listed Little Marchmont House, and a high concentration of Grade II listed buildings. There is concern that the site allocation would result in coalescence between Piccotts End and the larger conurbation of Hemel Hempstead. The SA site appraisal correctly identifies the main heritage assets but concludes that the effects of new development in this location would be uncertain. An HIA would be especially helpful in this case, and should be provided if this site is to be carried through into the Local Plan as an allocation, this will be the case for most large allocations.</p>	<p>The comments will be taken into account during the next stages of SA.</p>
<p>Herts Ecology Sustainability Appraisal: Extensive loss of agricultural ecology is clearly locally negative on this aspect and should be reflected thus, although this may not be significant. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>HH-h1b North Hemel Hempstead (Phases 1 and 2)</p>	
<p>Herts Ecology Sustainability Appraisal: Extensive loss of agricultural ecology is clearly locally negative on this aspect and should be reflected thus, although this may not be significant. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Individual respondent The SA Working Note is arbitrarily casual. For instance re HH-h1b in its classification the Landscape Impact as "likely to have some positive and some negative effects, none of which are significant " and water as "No predicted effects". This contrasts</p>	<p>The text "Exclude from further assessment and retain as Green Belt." was a recommendation in the Green Belt review which was reported in the Schedule of Site Appraisals. It is not a recommendation of the Schedule itself.</p>

<p>with the recommendation of Schedule of Site Appraisals to "Exclude from further assessment and retain as Green Belt." which we support.</p> <p>The assurance under SA4 "Climate Change" that this site would "require the provision of a range of facilities and services in two local centres (e.g. schools, shops, healthcare facilities) thereby reducing the need to travel for many day to day needs" is not matched by experiences when planning has reached a later stage, by which time the Council seems to have handed over responsibility for such matters to the developers and other agencies, and this would be particularly true for smaller and medium sized sites.</p>	<p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
<p>HH-h2 North of Gadebridge (Land at Piccotts End)</p>	
<p>Herts Ecology</p> <p>Sustainability Appraisal: Assessment appears reasonable. The SAC issue is an additional consideration.</p>	<p>Noted.</p> <p>The SA identifies potential minor adverse effects through loss of habitats.</p> <p>Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Individual respondent</p> <p>The Gade river is recognised as a chalk stream of national importance and is covered by a ground water protection zone. There is already significant water run off down Dodds Lane which regularly floods Piccotts End Road. This water ends up in the Gade. The proposed development will significantly increase this run off and will increase the chances of the Gade being contaminated and its banks etc. being damaged. It will also nullify recent drainage works carried out to reduce the water flowing through the village.</p> <p>Statements for SA4, SA5 and SA11 show a complete lack of local knowledge. Gadebridge local centre can only be reached</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>

<p>by a long walk up a steep hill or by car so cannot be deemed to be nearby.</p> <p>Comment for SA12 regarding local cohesion is totally irrelevant. The proposed development will not only swallow up large areas of green belt for housing but even more for the massive upgrade of the infrastructure that will be needed to support it, Given the proximity of Water end and the road restrictions provided there this development is unsupportable without much destruction of the green belt outside of what is proposed</p>	
<p>HH-h3 Land at Shendish, London Road</p>	
<p>Historic England</p> <p>Archaeological impacts will also need to be carefully considered and referenced in any site specific policies. For example, there is some concern regarding site HH-h3 – Land at Shendish Road Hemel Hempstead. The SA site appraisal states that the County archaeologist has been consulted which we are pleased to see. However, the County archaeologist has identified there to be a high risk that heritage assets with archaeological interest are present on the site. The SA then identifies that an archaeological assessment would therefore be required before submission of a planning application. Whilst this is supported it is not considered that this alone will be sufficient protection for the potential heritage within the site. The mitigation will need to be more specific and outline an iterative approach will address what will happen should anything be discovered rather than simply requesting an archaeological assessment to be submitted.</p>	<p>Noted.</p> <p>The comments will be taken into account during the next stages of SA.</p>
<p>Herts Ecology</p> <p>Sustainability Appraisal: Assessment appears reasonable.</p>	<p>Noted.</p>

	The SA identifies potential minor adverse effects through loss of habitats.
<p>W.Lamb Ltd</p> <p>This representation provided a table which compared TRL’s assessment with W Lamb Ltd’s own conclusions for each SA Objective.</p> <p>SA1: Biodiversity – disagree with the ‘x’ assessment. Should be ‘✓/x’ as for other large greenfield sites.</p> <p>SA2: Water ‘?’ Conclusion accepted in respect of HH-h3 but not for HH-h1a, HH-h1b and HH-e1. The Groundwater Protection Zone will need to be considered as part of any future planning application on the site. EA maps indicate that all the Hemel Hempstead sites fall within a Groundwater Protection Zone, however this is only referenced in the SA for sites HH-h2 and HH-h3 which is inconsistent.</p> <p>SA3: Flood Risk ‘–’ Conclusion accepted. The site is located in Flood Zone 1 and is therefore at the lowest risk of flooding.</p> <p>SA4: Climate Change ‘✓’ Conclusion not accepted. Should be ‘✓✓’. TRL’s recognition of the site’s proximity to local facilities in Apsley is supported, along with the assessment that the site’s proximity to the railway station could help encourage travel by public transport, and we consider this to be a significant positive effect.</p> <p>SA5: Air Quality ‘x’ Conclusion not accepted. Should be ‘✓/x’. The SA identifies that the sustainable location of the site may reduce the need to travel by car, which would have a positive impact on air quality compared to other sites. The potential impact of additional trip generation on the existing AQMA would be dealt with as part of a comprehensive transport</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>

strategy for the site and mitigated appropriately, to ensure the site would not have a negative impact on air quality.

SA6: Soils 'x' Conclusion accepted.

SA7: Resource efficiency '?' Conclusion accepted.

SA8: Historic environment '?' Conclusion accepted.

SA9: Landscape 'x' Conclusion not accepted. Should be '✓/x'. Development of any greenfield site would extend Hemel Hempstead into the countryside. The reduced area proposed for allocation has been selected to ensure there will be no detrimentally negative impact on the parkland setting of Shendish Manor and also provides the opportunity for further structural planting to strengthen some landscape areas.

SA10: Health and wellbeing '✓/x' Conclusion not accepted. Should be '✓'. The site is located near local facilities and the area proposed for allocation is on the lower lying area of the site, so occupiers are unlikely to be discouraged from walking due to site topography. Potential exists for potential positive impacts through increased accessibility to the retained 9 hole golf course. Proximity to the railway station and local services also increases the opportunity for walking instead of using cars for short journeys.

SA11: Sustainable locations '✓' Conclusion not accepted. Should be '✓✓'. The SA records a positive effect but makes no reference to the proximity of the site to Apsley Railway Station in respect of SA11. Given this and the conclusions in respect of SA4 above, it is considered that the site has potential to have a significant positive effect in terms of comprising a sustainable location for development compared to other greenfield sites around Hemel Hempstead.

SA12: Community cohesion '✓' Conclusion accepted. It is agreed that providing additional housing and contributions

<p>towards wider infrastructure improvements for the town will help to maintain community vibrancy and vitality.</p> <p>SA13: Housing '✓' Conclusion not accepted. Should be '✓✓'. Development of the site would provide a large amount of new housing, including the potential to deliver 40% affordable housing. This is considered to comprise a significant positive effect.</p> <p>SA14: Economy '✓' Conclusion accepted.</p> <p>SA15: Employment '✓' Conclusion accepted.</p>	
<p>Individual respondent</p> <p>Comments made in relation to the assessment against the following SA Objectives:</p> <p>SA1 Biodiversity. Given the habitats and species associated with the site, disagree with the assessment of potentially 'insignificantly negative' impact.</p> <p>SA3 Flood risk Disagree with assessment of 'no predicted effects'. Believe there to be a significant risk of flooding.</p> <p>SA8 Historic environment Object to the assessment of 'uncertain' impact. Development would affect the setting of Listed Buildings. The County Archaeologist has identified there to be a high risk that heritage assets with archaeological interest are present on the site.</p> <p>SA9 Landscape Disagree with the assessment of potentially 'insignificantly negative' impact. Consider that there would be a significant impact on the local landscape. The proposals for Shendish and Kings Langley would breach the five main purposes of Green Belt land.</p> <p>SA10 Health and well-being Disagree with the assessment finding of there being neither an overwhelmingly positive or negative impact. Believe there would be a significant impact on</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>

the health and wellbeing of its own and the wider population. The Shendish area provides considerable recreational opportunities for the Dacorum residents.	
HH-e1 Land east of A41 at Felden	
Herts Ecology Sustainability Appraisal: This does not reflect the increased isolation of the SSSI and adjacent compensation land. This is a negative effect on this aspect and should be reflected thus and could be significant unless addressed.	Noted. The SA identifies potential minor adverse effects through loss of habitats, including potential effects on the Roughdown Common SSSI. Any future SA will be informed by further ecological assessment of this site.
KINGS LANGLEY SITES	
Individual respondent Concerned that the SA has not adequately addressed the potential effects of potential future development in Kings Langley against the SA Objectives for Air Quality, Health and wellbeing, and Sustainable locations as affected by increased travel activity, impact on the natural environment and increased load on infrastructure have not been addressed by plans at King's Langley. Also a threat to the special and historical character of King's Langley village, which would be overwhelmed by the additional volume of residents in the proposed developments. I believe that these issues have not been addressed adequately in the proposals. Indeed, I believe that they are so fundamental as to be beyond adequate address.	Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA. The cumulative effects associated with proposed new developments will also be considered.
KL-h1 Land at Hill Farm, Love Lane	
Herts Ecology Sustainability Appraisal: This could be a neutral impact.	Noted. The SA identifies potential minor adverse effects through loss of habitats.
Individual respondents	Noted.

<p>SA Objectives SA4, SA5, SA11 – The site is not flat and level and has a steep descent to the village centre. The assessment appears to ignore the significant change in level between the site and the main high street. Site is a fair distance from the railway station – people who live closer to the station already drive.</p> <p>SA8 – it is considered that any develop on the site is likely to have a negative impact on the conservation area.</p> <p>SA10 – Any development is likely to be of sufficient density to eliminate this benefit.</p> <p>SA3 – the introduction of affordable housing in the village has already been shown to have a negative impact i.e. increase in crime rate; the developments completed over recent years have not resulted in any improvement to the surrounding transport infrastructure or services.</p>	<p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
<p>KL-h2 Land at Rectory Farm, Hempstead Road</p>	
<p>Herts Ecology Sustainability Appraisal: Assessment appears reasonable.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats.</p>
<p>Individual respondent SA4 and SA5 – Schools are located uphill from the site – not level. SA9 – it will depend on architecture of new buildings and level of density of development – likely to have a negative impact. SA13 - the introduction of affordable housing in the village has already been shown to have a negative impact i.e. increase in crime rate; the developments completed over recent years have not resulted in any improvement to the surrounding transport infrastructure or services.</p>	<p>Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>

KL-h3 Land to the east of A41 and Wayside Farm, Watford Road	
Environment Agency Please note that your working note states “ <i>This site is in a low risk flood zone and not in flood risk zone 2 or 3.</i> ” However there are areas of Flood zone 3a and 3b on the site to the east of Watford Road.	Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.
Herts Ecology Sustainability Appraisal: Assessment appears reasonable.	Noted. The SA identifies potential minor adverse effects through loss of habitats.
Individual respondents SA4 – any significant development of this site would significantly increase car use – people won’t walk or cycle to Sainsbury’s in Apsley or to the town centres of Watford or Hemel Hempstead. SA4, SA5 – the site has significant changes in level and is not flat. SA8 – the development of this site, as drawn, will have a significant negative impact on the heritage sites and the character of the village. There are likely to be the remains of the Plantagenet Palace. SA9 - The fields at Wayside Farm rise steeply above Watford Road and are visible from a wide area to the south and east. The entire character of the southern approach to Kings Langley will be radically changed by housing on Wayside Farm. SA10 – the site is already a well-used amenity space; the likely development density of the site is likely to harm the health and wellbeing rather than enhance it. SA13 - the introduction of affordable housing in the village has already been shown to have a negative impact i.e. increase in	Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.

<p>crime rate; the developments completed over recent years have not resulted in any improvement to the surrounding transport infrastructure or services.</p> <p>SA14 & SA15 – any development on the scale proposed is likely to significantly overwhelm the existing transport and services infrastructure without significant financial investment which has not been forthcoming following other local development (i.e. Apsley Lock, Ovaltine, etc.). Appraisal ignores that an operating dairy farm would be destroyed and thus is wrong in stating, without qualification, that housing would help the local economy and encourage provision of local services.</p> <p>Don't agree with the conclusions reached by the Sustainability Appraisal Working note. I appreciate that some development will take place in the future but it is important to take into consideration the loss of local amenities and valued landscape.</p>	
<p>MARKYATE SITES</p>	
<p>My-h1: Land south of Markyate</p>	
<p>Herts Ecology Sustainability Appraisal: Assessment appears reasonable.</p>	<p>Noted. The SA identifies minor potential adverse effects through loss of habitats.</p>
<p>Individual respondent Under current flightpath from Luton and doesn't consider noise and air pollution living under the flightpath. Doesn't consider the waste water infrastructure requirements.</p>	<p>Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
<p>My-h2 Land at Pickford Road</p>	
<p>Herts Ecology Sustainability Appraisal: Assessment appears reasonable.</p>	<p>Noted. The SA identifies minor potential adverse effects through loss of habitats.</p>
<p>Individual respondent</p>	<p>Noted.</p>

<p>We note your grid of assessment in the Site Appraisals SA Working Note, summarising each site against a number of SA Objectives. This could imply that each SA Objective carries equal weight.</p> <p>Believe that the following should carry particular high weight: Incompatibility with the Chilterns Management Plan 2014-19 (with a time period still to run). Likely incongruity of style and appearance to the immediate environment Safety, increased noise and traffic Absence of local infrastructure to support the new residents, adversely affecting the whole area</p>	<p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
<p>TRING SITES</p>	
<p>Individual respondents</p> <p>Comments were made relating to the following SA objectives: SA1 Biodiversity - Sites Tr-h1, Tr-h2 and Tr-h3 lie close to the Chilterns Beechwoods SAC and may require a Habitat Regulations Assessment (Appropriate Assessment) screening. Development would increase pollution, adversely affect the amenity of this area, and could lead to increased global warming which alone would be likely to impinge on the Chiltern Beechwoods. The hedges alongside Marshcroft Lane are old and of importance in their own right for their trees and shrubs, and for the wildlife they support. SA3 Flood risk - Sites Tr-h1 and Tr-h2 are known to have poor drainage and will flood during periods of increased rainfall. SA6 Soils - It is noted (in the Site Appraisals SA Working Note October 2017) that in the case of sites Tr-h1 and Tr-h2 the land is classified as grade 2 agricultural land, i.e. land of very good quality. Therefore to develop such land in any event</p>	<p>Habitats Regulations Assessment on the Local Plan is being undertaken which will examine whether the Local Plan with have likely significant effects on the Chilterns Beechwoods SAC, alone and in-combination with other plans and projects. If such effects are identified an Appropriate Assessment will be undertaken.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>

<p>would not be making efficient use of the land and protecting the soil.</p> <p>SA8 Historic environment - It is noted that a small area of Archaeological Significance lies within the western part of site Tr-h1. This is said to comprise “an enclosure of probable Iron Age or Roman date that has been identified from cropmarks visible on aerial photographs”.</p> <p>SA9 Landscape - Building on both sides of Marshcroft Lane will have severe consequences for this special environment.</p> <p>SA10 Health and wellbeing - Marshcroft Lane is a much valued amenity locally. It is used by dog walkers, horse riders, rambblers, joggers, cyclists, naturalists, and families.</p>	
<p>Tr-h1 Land to the north of Station Road</p>	
<p>Herts Ecology</p> <p>Sustainability Appraisal: Extensive loss of agricultural ecology is clearly locally negative on this aspect and should be reflected thus, although this may not be significant. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats.</p> <p>Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Individual respondents</p> <p>An oil pipeline crosses site</p> <p>Disagree with assessment on ‘no predicted effects’ for the Flood risk objective (SA3). The site is prone to flooding at times of high rainfall and the property named Ivy Cottage (located close to the canal, and towards the end of Station Road) has suffered from flood water from the fields over many years.</p>	<p>Noted.</p> <p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
<p>Harrow Estates / Turley Associates</p> <p>The SA does not reflect the more detailed technical evidence that is available for this site. In the circumstances it does not</p>	<p>Noted.</p>

<p>provide Dacorum Borough Council with the correct evidence from which to select the most sustainable distribution option. Furthermore, Land East of Tring has been assessed within the Site Appraisals SA as a reasonable alternative to deliver new housing within Tring. The assessment has identified a range of negative, uncertain and positive effects however this assessment was undertaken on the smaller option of Land which is now contained within the large site, Land to the east of Tring which is the subject of these representations.</p> <p>[The representation included a Sustainability Appraisal for the site undertaken by Turley Associates.]</p> <p>Table 1 of the Site Appraisal SA summarises the scoring of all sites which includes Land East of Tring (ref: Tr-H1) which is now contained within the larger Land to the east of Tring and which is subject to this SA and representations.</p> <p>It is noted that the SA assessment records the following scoring:</p> <ul style="list-style-type: none"> • A significant negative score for SA Objective 6 (Soils) on the basis that the site is located on Grade 2 agricultural land. [The Turley SA scored the site as neutral as most of the site has been assessed as Subgrade 3b.] • Negative and positive effects upon SA Objective 5 and 6 (Climate change and Air Quality) given the distance to the town centre and employment opportunities which is mitigated by the proximity to the Train station and access to sustainable modes of transportation. [The Turley SA scored the site as significant positive for these objectives.] • An uncertain impact upon SA objective 8 (Historic Environment) given the setting of Pendley Manor. [The Turley SA scored the site as neutral.] 	<p>Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.</p>
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<ul style="list-style-type: none"> • A negative impact upon SA Objective 9 (Landscape and Townscape) as a result of the Sites proximity to the AONB [The Turley SA scored the site as neutral.] • A positive impact upon SA Objective 11 (Sustainable Locations) although the SA identifies the site as being at a distance from the town centre. [The Turley SA scored the site as significant positive.] • A positive impact upon SA Objective (13 Housing) under the assumption that it could deliver up to 1,000 new dwellings. [The Turley SA scored the site as significant positive.] • A positive impact upon SA objective 14 and 15 (Sustainable Prosperity and Employment and Skills) acknowledging that the new housing would support existing services and job creation. [The Turley SA scored the site as significant positive for these objectives.] 	
<p>Tr-h2 Land west of Marshcroft Lane</p>	
<p>Herts Ecology Sustainability Appraisal: This could be a neutral impact. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Tr-h3 Land at Icknield Way / Grove Road (New Mill)</p>	
<p>Herts Ecology Sustainability Appraisal: Assessment appears reasonable. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.</p>
<p>Tr-h4 Land at Cow Lane / Station Road</p>	
<p>Herts Ecology Sustainability Appraisal: Assessment appears reasonable. The SAC issue is an additional consideration.</p>	<p>Noted. The SA identifies potential minor adverse effects through loss of habitats.</p>

	Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.
Tr-h5 Land at Dunsley Farm, London Road	
Herts Ecology Sustainability Appraisal: Loss of agricultural ecology and impacts on WS are locally negative and partially significant. The SAC issue is an additional consideration.	Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.
Herts CC Comments provided in relation to the following SA Objectives: SA1 Biodiversity – consider that the assessment should be changed from ‘minor adverse’ to mixed adverse/positive due to the potential for mitigation. SA8 Historic Environment – consider that sites should be the subject of historic asset assessment before assessment scores are allocated SA10 Health and wellbeing – consider that the mixed adverse/positive score should be changed to ‘minor positive’ as the effects identified relating to noise from the A41 would not be the case across the whole of the site. There is also the potential for dual use of any playing fields associated with any education provision which may be identified as being required at Dunsley Farm, which could offer the potential for dual community use.	Noted. Comments relating to specific sites will be taken into account if the sites are considered during further stages of plan making and SA.
Tr-h6 Land north of Icknield Way (Waterside Way)	
Herts Ecology Sustainability Appraisal: Given recent management this could be a neutral impact. The SAC issue is an additional consideration.	Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.

OTHER	
O-h1: Land at Old Kiln Meadow, Water End Road, Potten End	
Herts Ecology Sustainability Appraisal: Assessment appears reasonable although woodland would be significant. The SAC issue is an additional consideration.	Noted. The SA identifies potential minor adverse effects through loss of habitats. Future HRA will consider the potential effects of the site on the SAC – if the site is considered in future rounds of plan making.
O-h2: Land to the north east of Grange Road, Wilstone	
Herts Ecology Sustainability Appraisal: Assessment appears reasonable – but could be neutral.	Noted. The SA identifies potential minor adverse effects through loss of habitats.

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)	
Question Text: Has this consultation been easy to participate in? - Individual responses from organisations	
See key below for categorisation	
Key points raised in representations	Officer response
1. Tring Town Council – puts too much demand on the consultee, the document is very long and technical and it's inappropriate to assume non-planners can understand the detail. Provide a more summarised consultation, which will be more meaningful. Need something that speaks to the average person, because we are not effectively engaging with the public and this means we are not serving them well. Could have given people multiple options?	Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation. The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document.; The comments are noted and will be taken into account in the production of documents in the future including further consultation on the emerging Local Plan.
2. Redbourn Parish Council – no consultation events in Piccotts end, Woodhall farm and Redbourn village. As these communities will be affected by development this needs to be reviewed.	Noted; the consultation events were spread across the Borough with daytime and evening sessions to maximise the accessibility of the sessions to the whole community. All documents were also made available on line and in public buildings such as Council Offices and Libraries
3. Hertsmere Borough Council - found the document to be informative and an easy to read	Comments noted
4. Central Bedfordshire Council - it is considered that a further stage of consultation may be beneficial prior to a pre- Submission consultation to ensure the support of neighbouring authorities, to enable the Borough Council to take on board appropriate suggestions.	Noted; the programme for further rounds of consultation will be considered and addressed through an updated LDS if changes are proposed.

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)	
Question Text: Has this consultation been easy to participate in? - Individual responses from organisations	
See key below for categorisation	
Key points raised in representations	Officer response
5. Herts and Middlesex Badger Group - Concerning questions 39-45, HMBG requested an extension to study which option would be more preferable with the protected species and its habitat, as they were not given enough time to access all the relevant records. HMBG would like to offer to work with us on future local plans, with them being a stakeholder. They also think this would be particularly beneficial before sites are allocated for the pre submission consultation, if this is agreeable with the council, and they would like to be included as stakeholders prior to the pre submission consultation.	Noted; the offer to work closely on this and future plans is welcomed. The timing of the consultation is set through Statutory provision and the Council's SCI. The consultation was carried out in line with the Statutory provisions and extant SCI.
6. Aylesbury Vale District Council - Given the Pre Submission is the final stage to be able to comment it is queried if the local plan should not have a 'draft plan' stage so that people can comment and the Borough Council able to change its proposals before finalising the plan.	Noted; the programme for further rounds of consultation will be considered and addressed through an updated LDS if changes are proposed.
7. Bovingdon Parish Council – the parish is willing to work with the borough and other stakeholders to consider the best options for the village.	Noted; the offer to work closely on this and future plans is welcomed.

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)

Question Text: Has this consultation been easy to participate in? - Individual responses from organisations

See key below for categorisation

Key points raised in representations	Officer response
<p>8. BRAG – official complaint about how difficult it is for residents to comment. 100s of complaints that DBC has deliberately made the process excessively complicated. Going round in circles, and experiencing glitches, which led to people giving up. Further consultations must be made simpler and more user friendly.</p>	<p>Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation.</p> <p>The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document.</p> <p>For the avoidance of doubt there was no intent to make it difficult to comment; it is considered that the level of response received demonstrate that many organisations and individuals were able to comment.</p> <p>The comments are noted and will be taken into account in the production of documents in the future including further consultation on the emerging Local Plan.</p>
<p>9. Berkhamsted Citizens – submitting the document rather than completing sections, a questionnaire restricts the consultee to the thinking of those questioning.</p>	<p>Noted: the form of the questions was intended to focus consideration on key issues. All questions were supported by free text boxes allowing comments to be made without restriction.</p>
<p>10. Tring in Transition – accept the attached document, as on two occasions the portal site did not record the submitted comments.</p>	<p>Noted; the Objective software which handles the online submissions is constantly being updated and issues and difficulties are fed back to the supplier. Support is provided by the supplier to resolve any issues that may arise.</p>

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)	
Question Text: Has this consultation been easy to participate in? - Individual responses from organisations	
See key below for categorisation	
Key points raised in representations	Officer response
11. Grand Union Investment - would like to take a final opportunity to remind the Council that the programme is already some 15 months behind the timescales identified in the judgement of Mr Justice Lindblom and it is therefore essential that any further delay to this programme is avoided.	Noted; although this comment is not considered to respond directly to the question raised.

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)	
Question Text: Has this consultation been easy to participate in? - Individual responses from organisations	
See key below for categorisation	
Key points raised in representations	Officer response
<p>12. GFRA - For an ordinary member of the public the volume and complexity of the documents, that one would have to read and understand in order to fully appraise, and give meaningful comment on the benefits or otherwise of the various options is a daunting task. I believe that the consultation period is far too short for a plan which will have such a dramatic impact on the size and character of Tring.</p>	<p>Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation.</p> <p>The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document.</p> <p>For the avoidance of doubt there was no intent to make it difficult to comment; it is considered that the level of response received demonstrate that many organisations and individuals were able to comment.</p> <p>The comments are noted and will be taken into account in the production of documents in the future including further consultation on the emerging Local Plan.</p> <p>The timing of the consultation is set through Statutory provision and the Council's SCI. The consultation was carried out in line with the Statutory provisions and extant SCI.</p>

 = Was NOT easy  = WAS easy  = other suggestions

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)	
Question Text: Has this consultation been easy to participate in? Assessment of responses from individuals	
NO	
Key points raised in representations	Officer response
1. The most common complaint was that the document was deliberately made too complicated to stop participation. People seemed very suspicious of the council.	Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation. The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document. For the avoidance of doubt there was no intent to make it difficult to comment; it is considered that the level of response received demonstrate that many organisations and individuals were able to comment.
2. A few people complained that there were glitches, which returned them to the beginning of the document, losing their previous comments. The site did not save comments correctly.	Noted; the Objective software which handles the online submissions is constantly being updated and issues and difficulties are fed back to the supplier. Support is provided by the supplier to resolve any issues that may arise.

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)

Question Text: Has this consultation been easy to participate in? Assessment of responses from individuals

NO

Key points raised in representations

Officer response

3. People struggled to find and access the portal. Was not signposted properly on the website. Many people did not realise how to comment – needed to flyer in all areas of the borough. Not public enough. Written in “management speak” “consultantese” and “meaningless jargon”.

Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation.

The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document.

The comments are noted and will be taken into account in the production of documents in the future including further consultation on the emerging Local Plan.

4. There was an overall need for more general direction and guidance. Seemed to only be directed at those who understand the process, needed to have summaries in ‘layman’s terms’.

Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation.

The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document.

The comments are noted and will be taken into account in the production of documents in the future including further consultation on the emerging Local Plan.

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)

Question Text: Has this consultation been easy to participate in? Assessment of responses from individuals

NO

Key points raised in representations

Officer response

5. In addition to the need for general direction, there was dissatisfaction regarding the help guide – that it was not helpful.

Noted; this will be reviewed and redrafted/amended as necessary to provide bespoke support to future consultations

6. A few people were not sent an auto-reset password email, therefore they could not log back in.

Noted; this has been notified to Objective who will review the functionality issues.

7. Those using mobile devices had real trouble, specifically Apple devices. This was described as archaic.

Noted; this has been notified to Objective who will review the functionality issues.

8. The document was released too soon before Christmas and ordinary people were not given enough time to respond. Not good for those who have limited time.

Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation.

The timing of the consultation is set through Statutory provision and the Council's SCI. The consultation was carried out in line with the Statutory provisions and extant SCI.

The timing of the consultation was set to avoid the main Christmas/New Year holiday period.

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)

Question Text: Has this consultation been easy to participate in? Assessment of responses from individuals

NO

Key points raised in representations

Officer response

9. Undemocratic – as it was not easy to access or understand. Missed the point of public participation. The process was described as not fit for purpose.

Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation.

The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document.

The comments are noted and will be taken into account in the production of documents in the future including further consultation on the emerging Local Plan.

10. Many were worried that their comments would just be ignored anyway. Is there a way to measure resistance, or will the decisions be made regardless of comments.

All comments made will be taken into account and every comment submitted can be viewed and is attached as supporting information to this document in the appendices.

Key points are also summarised in this document by question and an overview of the main themes is also provided as part of this document

Question Number 47 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)	
Question Text: Has this consultation been easy to participate in? Assessment of responses from individuals	
NO	
Key points raised in representations	Officer response
11.The portal was described as difficult to navigate. The document itself on the portal was too complex to follow and not understandable.	<p>Noted; the consultation has to follow a statutory process supported by guidance in the NPPF and PPG. Every effort was made to strike a balance between detail and ease of interpretation.</p> <p>The issues and options to be addressed are complex and far ranging; the need to set out multiple options adds to the complexity of the document.</p> <p>The comments are noted and will be taken into account in the production of documents in the future including further consultation on the emerging Local Plan.</p> <p>The Objective software which handles the online submissions is constantly being updated and issues and difficulties are fed back to the supplier. Support is provided by the supplier to resolve any issues that may arise.</p>

Question Number 48 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)

Question Text: Do you have any other comments to make which are not covered by any of the previous questions? Please provide your comments here

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations	Officer response
1. Green belt policy is not consistent with national policy (too much land [residents' view] or too little land [developers' view] proposed to be released)	The protection and enhancement of the natural environment is a key local priority. The final decision on whether or not to allow some development in the Green Belt will depend upon a number of factors, including which option is chosen, whether exceptional circumstances exist and if development at places in the Green Belt is sustainable. DBC's approach is taken in giving recognition of national policy and guidance on review of the Green Belt and possible development within it.
2. Should the stated capacity of 10,940 homes over the plan period be reduced?	Government requires a significant increase in the numbers of homes to be provided and local authorities are required to achieve housing targets set by central government. The figure stated is that which the government requires to be provided in the Dacorum area over the period of the emerging Local Plan.
3. Undue weighting is being given to developer influence	Dacorum engages with the community and all stakeholders, as the consultation demonstrates, to achieve a local Plan that recognises concerns and aspirations of residents, businesses and other stakeholders and realises opportunities to create a vibrant and attractive area in which to live and work. Developers have a role to play in providing new homes and employment opportunities whilst operating within and being held accountable to the planning system.

Question Number 48 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)	
Question Text: Do you have any other comments to make which are not covered by any of the previous questions? Please provide your comments here	
<i>If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available</i>	
Key points raised in representations	Officer response
4. House building rates and Green belt releases are a significant departure from policies in the Core Strategy	The emerging Local Plan gives recognition to the new NPPF and the housing delivery targets for the Dacorum area as mentioned in 1 and 2 above.
5. Current build rate in Berkhamsted is nearly twice the target rate and the rest of Dacorum lags behind	Noted; this will be taken into account as development of the plan progresses; however, it is unlikely to be a determining consideration in moving the plan forward.
6. Why does the Local Plan time horizon stretch to 2036 when the NPPF only requires a 15 year time plan (AVDC)	It is highly possible that in practice that 2036 will provide a 15 year time frame from the date that the Local Plan is adopted.
7. Why is the emerging Local Plan looking at many more issues than the three that came out of the Core Strategy Examination (AVDC & CBC)	This is a new consultation on a full and comprehensive Single Local Plan. The Core Strategy was a more focussed consultation and the recommendations of the Examination into the Core Strategy related to a focussed partial plan review. The points raised in the Inspectors report for further work are included in the Issues and Options consultation.
8. Emerging local Plan needs to give more prominence to the historic environment. Should also include site allocations and include designating areas as unsuitable for development	This is also dealt with in Q26. Dacorum considers maintaining and enhancing the historic environment to be very important. The IO Consultation document explains in paragraph 8.2.4 not all designations relating to the historic environment are made by Dacorum through the Local Plan. Some are controlled through separate legislation. Dacorum intend to show as many of these designations as it can on the Policies Map, to provide a clear picture of the restrictions affecting particular areas.

Question Number 48 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)

Question Text: Do you have any other comments to make which are not covered by any of the previous questions? Please provide your comments here

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Key points raised in representations	Officer response
9. Evidence for emerging Plan lacks a strong historic evidence base	This issue is largely dealt with in Q26. As explained in 8 above not all designations are made by Dacorum through the Local Plan so the evidence base may at first sight appear to be more limited than might be thought to be the case.
10.SADC exercised by naming East Hemel development as "Gorhambury"	Since the I&O Consultation ended the development is referred to as the
11. Emerging local plan should also contain a Health Impact Assessment	Noted; the inclusion of such a document as part of the Evidence Base for submission will be considered.

Appendix 5

Appendix 5 – Supplementary comments from statutory consultees, Town/Parish Councils, other Councils and statutory bodies and other contributors in response to each question and officer response not captured in Appendix 4

Question Number 01

Question Number 01

Question Text: Question 1 Do you agree with the conclusions reached in the Sustainability Appraisal that accompanies this Issues and Options document? Yes / No.

If no, please explain why and what you think needs to be amended.

No supplementary comments

Question Number 2

Question Text: Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?

NO

If no, please explain what we have missed and how they should be addressed in the plan.

Inadequate information regarding development proposals in Three Rivers

Consultation has not delivered positive outcomes or joint working

Those outside Dacorum should be given the opportunity to comment on the proposals

Education, health and other infrastructure providers should be engaged

Negative impacts on existing residents have not been considered

The Site Allocation Plan's examination report required a review of the plan against specific items which has not taken place

Green Belt land should not be built on.

Inadequate consideration of the need to provide affordable homes to meet a range of housing needs and tenures

Inadequate consideration of air quality and pollution

Proposed development encroaches into the Green Belt

Shendish is part of Kings Langley not Hemel Hempstead

Property in Dacorum is not truly affordable

Impacts on landscape quality have not been considered

Support for comments made by BRAG

Support for Grove Fields Residents Association Report

The government is proposing to strengthen duty to cooperate and this should be addressed in the work with other councils

Full consideration should be given to a new town

Bekhamstead cannot support further development

Kings Langley cannot support further development

Tring cannot support further development

Bovingdon cannot support further development

Question Number 2

Question Text: Have we reflected all cross boundary issues, or issues of particular importance to you or your organisation?

YES

If no, please explain what we have missed and how they should be addressed in the plan.

SADC have not cooperated with DBC to deliver joined up development

The SHMA should look beyond SW Herts

Inadequate highway and rail infrastructure to support further development, further development will require significant highway and rail improvements; new infrastructure should be provided ahead on new housing

Property in Dacorum is not truly affordable

Question Number 3

Question Text: Have we taken account of all relevant studies and reports as part of our Issues and options work?

NO

If no, please explain what the gaps in our evidence are and how they should be addressed.

- Greenbelt and the environment (including Chilterns Area of Outstanding Natural Beauty, flood risk areas, and wildlife and biodiversity).
- Transport (including public transport provision, traffic issues, safety of all road users, and pollution).
- Infrastructure (including utilities and job opportunities within the different towns).
- Health and access to the open countryside.
- Local housing needs (including the provision of affordable homes, a great mix of homes, and homes better suited to the young and elderly).

Others

- Piccotts End Residents Association
- Woodland trust and Herts and Middlesex Wildlife Trust/ Wildlife, Heritage, environment, biodiversity- EIA ecological assessment
- Traffic/transport/ pollution/ issues of safety for pedestrians and road users
- Infrastructure- including resources such as water
- Greenbelt- maintaining settlement boundary, consideration of housing white paper, NPPF- protection to these sites is given the highest weighting
- Flood risk
- Health, openness, access to countryside
- Environmental credentials of development
- Small hamlets/ villages arguing they should have to take housing for other areas
- Consideration of residents' views
- Talk of discussion with neighbouring authorities- duty to cooperate
- Air quality action plan
- Canals and river trust report
- South West Hertfordshire Economy Study 2016
- West Herts Hospital Trust report 2016

Question Number 4**Question Text: Do you agree with the suggested vision for the Borough?****YES***If no, please explain what changes you would like to see and why.*

- Potential for downsizing from under occupied properties should be studied
- The Borough's vision is exemplary. The proposed level of development runs contrary to every aspect of the vision
- Do not see how this can be achieved with even the smallest number of proposed houses
- Infrastructure is stretched and inadequate to support further development
- Public Transport is not good particularly for remote settlements
- The area will be swamped by new development
- Existing settlements are losing their identity
- Health care needs to be carefully considered at all levels with the right facilities in the right locations
- Loss of existing green space will increase the pressure on the remaining areas
- There is no reference to climate change in the vision, zero carbon development should be promoted
- Market towns should provide facilities to support their surrounding areas
- Additional water abstraction would place an unacceptable pressure on supply
- The impact of topography with steep sided valleys needs to be taken into account
- Support for comments submitted by BRAG

Question Number 4**Question Text: Do you agree with the suggested vision for the Borough?****NO***If no, please explain what changes you would like to see and why.*

- The development should include homes for rent as part of the affordable element; greater than 40% of homes should be affordable; affordable homes should be located close to employment opportunities
- There should be greater emphasis on protecting wildlife and promoting biodiversity
- Existing settlements will be swamped and the magnitude of development will lead to settlements coalescing
- Existing infrastructure, including transport, health and education is insufficient to support current and proposed development and there are no clear proposals to deliver new infrastructure in a timely manner to support new development
- Existing retail facilities are inadequate and there is not scope to expand and enhance existing town centres
- The scale of development proposed is incompatible with good design and protecting the historic environment
- Dacorum has always been a development focussed Council which is not best placed to implement the vision of protecting Green Belt and AONB
- Lack of vision around creating walkable/cyclable communities where all facilities, infrastructure and employment can be easily reached.
- The vision is idealised, rose tinted and unrealistic and the scale of development is incompatible with the vision
- The vision is unchanged from the 2013 Core Strategy

Question Number 5

Question Text: Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovingdon, or the wider countryside?

YES

If no, please explain what changes you would like to see and why.

- The Core Strategy reflects but the new plan does not
- The principles set out must be adhered to
- The document should be strengthened to protect the character of villages and other settlements
- Conservation, both natural and historic environment need to be taken into account
- Economic aspects should be considered
- The vision set out for the new plan is broadly supported

Question Number 5

Question Text: Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovingdon, or the wider countryside?

NO

If no, please explain what changes you would like to see and why.

- Impacts on the character of existing settlements need to be recognised
- There is too much development proposed across the Borough
- The objectives are excellent: building on green belt land does not fulfil these
- Shendish should not be identified as part of Hemel Hempstead
- The proposed core strategy and plans seem to be inconsistent and unbalanced
- There is inadequate parking in existing settlements
- Cannot agree to objectives that are clearly flawed
- Inadequate water supply to support new developments
- The beauty and charm of the Chilterns will be lost due to the scale and form of development proposed
- No account is taken of the fact that people move to small villages because of their rural character and this will be lost if the proposed scale of development takes place
- Berkhamsted cannot support further development
- Kings Langley cannot support further development
- Tring cannot support further development
- Bovingdon cannot support further development
- High quality hamlets should be developed to maintain the quality of the area rather developing mass market housing as proposed
- The current Core Strategy recognises the differences and character of each settlement. The proposed new developments will destroy local character and replace hundreds of years of history with characterless developments.
- Loss of agricultural land arising from proposed development
- Berkhamsted is a sustainable location for further development
- The question is too complex to simplify to a yes/no answer
- Focus should be given to making the best use of previously developed land
- There will be harm to the AONB and its setting rather than providing protection to it

Question Number 6

Question Text: Do you agree with the suggested objectives for the new Local Plan?

YES

If no, please explain the changes you would like to see and why.

- The objectives must be used to formulate the plan
- We need to increase economic prosperity and protect our green environment.
- The retail experience in Hemel Hempstead town centre needs to be dramatically improved.
- Car park charges need to be reduced, bus fares should be also be reduced to a realistic level and rents for commercial properties should also be capped so that retailers and shoppers are encouraged to come back to the town centre.
- The objectives set out are laudable, but the proposals will not fulfil them
- If new house building is carried out on a large scale it will be impossible to achieve the objectives
- All options must be measured against the stated objectives
- Provision needs to be made for truly affordable housing for local people
- Conservation, both natural and historic environment need to be taken into account
- Economic aspects should be considered
- Provision should made to prevent the proliferation and/or concentration of betting shops/casinos
- Provision should made to prevent the proliferation and/or concentration of fast food outlets.
- New infrastructure should be provided in advance of the new development that it is intended to serve

Question Number 6**Question Text: Do you agree with the suggested objectives for the new Local Plan?****NO***If no, please explain the changes you would like to see and why.*

- The objectives are excellent: building on green belt land does not fulfil these
- Existing settlements should not be allowed to coalesce within the Borough or across the boundary into adjacent settlements
- The proposed core strategy and plans seem to be inconsistent and unbalanced
- There is inadequate parking in existing settlements
- Cannot agree to objectives that are clearly flawed
- Inadequate water supply to support new developments
- The current core strategy already proposes overdevelopment in the Borough and the new plan goes much further than this
- The beauty and charm of the Chilterns will be lost due to the scale and form of development proposed
- No account is taken of the fact that people move to small villages because of their rural character and this will be lost if the proposed scale of development takes place
- High quality hamlets should be developed to maintain the quality of the area rather developing mass market housing as proposed
- Loss of agricultural land arising from proposed development
- Berkhamsted is a sustainable location for further development
- The question is too complex to simplify to a yes/no answer
- Focus should be given to making the best use of previously developed land
- There will be harm to the AONB and its setting rather than providing protection to it
- Bovingdon airfield is a brownfield site yet it has not been put forward for development
- Low carbon standards and sustainable development principles should be followed – zero carbon by 2050 should be added to bullet 3
- Where open space and Green Belt is lost new open spaces areas should be provided
- Housing delivery should be limited to 300 dwellings per annum
- Current levels of housing growth are estimates and have not been properly evidenced
- There should be specific objective regarding the enviro-the Enterprise Zone to the east of Hemel Hempstead

Question Number 7
Question Text: Do you agree with proposed policy coverage of the new Local Plan?
YES
<i>If no, please set out what issues, topics or policies you think need to be included.</i>

- Policies identified are crucial – all options should be measured against them (BRAG, BCA & Berkhamsted TC)
- Pleased to see that the proposed vision articulates a clear commitment to health and wellbeing, setting out many of the aspirations that support healthy places and healthy communities. (Public Health Service Herts CC)
- Proposed policy coverage incorporates and retains specific development control in relation to the importance of Green Belt land, and further to this the topics relating to the homes and jobs needed for an area are sufficiently justified so as to robustly defend the Authority from speculative development (Grove Field Residents Association)
- Development of a new local currency to support and encourage the local economy
- Stronger focus on collaboration with neighbouring authorities with regards to housing, infrastructure provision and employment (and to develop a local energy provider with emphasis on renewable energy)
- Need to apply proposed policies to existing housing before building more
- Policies proposed are fine but are in wrong order (provide jobs and infrastructure before housing) and need prioritising against each other
- Need a policy for retention of farm and agricultural land.
- New local plan presents an opportunity to update development management policies (see Q46) (Taylor Wimpey/ Pegasus)
- Agrees with question but a strategic policy is needed to address delivery of conservation and enhancement in the landscape (Historic England)
- Generally supportive but proposed focus on brownfield land may constrain delivery of affordable homes. Need a mix of brownfield and greenfield sites (Gallagher Estates)
- The efforts that Dacorum are taking, are fully supported namely:
 - Allowing housing on land which is no longer needed for employment uses;
 - Encouraging higher densities and taller buildings on sites where this won't be damaging to the area's character i.e. Hemel Hempstead town centre and Spencer's Park, North Hemel Hempstead; and
 - Making modest allowance for small 'windfalls'. (KLDRA)
- Needs to be a greater differentiation of settlement and development in the area.
- Not all of overarching objectives set out in 4.2.1-4.2.3 are covered, for example approach to Green belt and provision of health care facilities should be outlined in the objectives (Gallagher Estates)

- Agree with policies which should give powers to retain specific control with regard to Green belt and defend it from speculative development.
- Support approach of intention to include Development Management policies to replace the older Local Plan and the Site Allocations document. (Hightown Housing Association).

Question Number 7**Question Text: Do you agree with proposed policy coverage of the new Local Plan?****NO***If no, please set out what issues, topics or policies you think need to be included.*

- It is not clear from the plan how the Vision and Objectives (for Health and Wellbeing) will ultimately be delivered through policy; the proposed policy coverage does not explicitly pick up on health and wellbeing alongside the provision of healthcare facilities. (Public Health Service Herts CC)
- Lacks reference to energy performance and design standards for buildings
- Needs to make stronger reference to renewable energy
- Kings Langley & District Residents Association (points not already covered):
 - greater emphasis should be placed on the following:
 - Distribution of Development – the focus to be on Hemel Hempstead,
 - regeneration schemes and the effective use of previously developed land to minimise the need for the further take of greenfield / Green Belt land;
 - Greater differentiation should be made between these two tiers of settlements (Towns and Large Villages) in terms of their role and ability to provide services to the local area Green
 - need to protect existing character through protection and enhancement of the historic environment and separation with neighbouring towns through the retention of the strategic gap
 - major concerns regarding infrastructure which will need to be robustly reviewed
 - Within the Hemel Hempstead Place Strategy that sites identified for potential development include those for Kings Langley as well. Kings Langley is a distinct and separate settlement and should not fall to be considered as part of Hemel Hempstead
 - The separate nature of Kings Langley should be made clear by the removal of all Kings Langley sites from the Hemel Hempstead map (includes land at: Wayside Farm (KL-h3), Rectory Farm (KL-h2), Hill Farm (KL-h1) & Shendish (HH-h3), Kings Langley).
 - All settlements of the Borough, including Kings Langley as a separate entity from Hemel Hempstead, should be added to the policy list for the preparation of Place Strategies
 - We don't accept that the figure of 10,940 is necessarily the upper level which can be accommodated without the use of greenfield sites.
 - Further work needs to be undertaken to explore the cross boundary inter-relationships between provision of housing, facilities and services, and the opportunities that exist for the identification of suitable sites for allocation.

This is particularly relevant in relation to Kings Langley which has been highlighted as a 'cross-boundary settlement'.

- Too generic, not specific enough to account for variation in demography, resources and infrastructure across the area.
- Does not provide coherent policy to strengthen economic prosperity, especially supporting rural economy
- How will developers be held to provision of infrastructure, affordable housing & climate change mitigation
- Climate change mitigation should include moving to a zero carbon or, as a minimum, a low carbon future (Tring in Transition)
- Shendish Manor is in Kings Langley (not Hemel Hempstead) and should be acknowledged as such.
- Area is already overdeveloped
- How has housing need been calculated? Berkhamsted is already ahead of target.
- Needs clear commitment to review Green Belt providing linkages to the planning policies
- Essential that proper provision be made for parking for rural workers to have a car to be able to get to work (Markyate PC)
- Should be a standalone policy for the AONB based on the Chiltern Conservation Board's model policy for local plans for the Chilterns AONB which would ensure best practice and cross boundary co-operation. (CCB)
- Needs to be more social housing and homes to rent at affordable prices
- Infrastructure not taken into account. No provision for a new road for Bovington
- Jobs are needed in the area but rents are too high for businesses already
- There are already empty offices why do we need more?
- Roads, public transport, hospitals are at breaking point with current population
- Additional policy is needed to maintain the historical look and feel of settlements and not merge them
- Need an entertainment / band centre like St Albans has
- Traffic congestion
- No infrastructure for Bovington
- Need provision to be made for schools
- Parking is already difficult and will be made much worse
- No evidence provided of need for new homes in Bovington or Kings Langley (Go to Q6)
- Questions are designed to prevent people taking part by poor and complicated presentation
- Pollution (environmental quality) and demands on water supply
- Increased risk of flooding and exacerbation of flooding in areas already prone to it.
- Already have a Local Plan which these proposals seek to side step
- Lacks a Green Infrastructure policy
- Need a greater differentiation between the two tiers of settlement (Kings Langley & District Residents Association – and echoed by Gallagher Estates supportive statement)

- Need greater clarity on identifying new allocations and needs release from Green belt (Harrow Estates)

Question Number 8

Question Text: “Do you agree with the proposed broad approach to distributing new development?”

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **Premier Property;** DBC should accept that Berkhamsted, alongside Hemel Hempstead, is a suitable location for supporting new growth. Objection to be made to focussing significant growth levels to Hemel Hempstead specifically.
- **Watson Howick;** DBC should deliver growth ensuring that minimal impact on the environment is achieved, regarding green belt land. Specific reference is made to Cow Lane/Station RD, Tring TR – H4, which is capable of making sustainable extensions to existing settlements, with minimal impact on the environment.
- **C/O Phillips;** agree development should be spread across the main three settlements of the town.
- **Taylor Wimpey;** agree with the approach to place new growth with existing supportive infrastructure. In this context, large villages such as Berkhamsted and Bovingdon should not be discounted as appropriate locations for growth.
- **St Williams Homes;** greater approach to optimising brownfield sites, including the former Gasworks site off of London Road. Reference made to paragraph’s 11 & 17 in the NPPF, discussing the need for LA’s to maximise the use of brownfield land.
- **D B Land;** supports overall approach, with position in Markyate to remain unchanged.
- **Gleesib Developers LTD;** supports settlement hierarchy.
- **Kier Property;** support approach to focus growth on the largest settlements in the Borough.
- **Majesticare LTD;** Welcome hierarchy approach, and welcome the potential expansion of Berkhamsted, particularly at the unconstrained site at Spring Garden Lane.
- **Hightown Housing Association;** Support the approach to focus new development on existing larger settlements in the Borough, e.g. Bovingdon. Release of green belt land may be necessary but DBC must make the best use out of using green belt land.
- **W Lamb LTD;** agree with the approach to focus new growth on larger settlements, especially Hemel Hempstead, to secure necessary investment and regeneration income for the town.
- **Fairfax Classic;** support approach to focus growth on HH. This will support existing sustainability new town principles, and preserve the character of the existing new town.
- **Waterside Way Sustainable Planning;** approach should include DBC placing growth where it will not negatively impact the character of existing settlements.

DBC should continue to invest in HH including necessary infrastructure improvements for the town. The three main settlements are the most sustainable place to focus growth.

- **Whitecare LTD**; agree with approach to focus growth on main settlements. Recognise that this may lead to the release of green belt land.
- Should encourage higher densities to further improve infrastructure provision. Public transport provision needs drastic improvement in the area in particular.
- Concerns that the settlement hierarchy placing precedence on growth at Hemel Hempstead would put attractive green belt land at Piccotts End at risk of development. Character of this historic hamlet should be preserved.
- If the Council allocated more housing to the settlements in the Rural Area, specifically in Marsworth, Wiggington, Albury, and Cow Roast, the number of new homes proposed in Tring could be substantially reduced.

Question Number 8

Question Text: “Do you agree with the proposed broad approach to distributing new development?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **Tring In Transition;** Tring delivering above targets for new growth. Broad approach okay.
- **Chiltern Society;** agree with approach to concentrate growth on larger settlements. Not assured that minimising the impact on the AONB through new growth is being adhered to. Bullet point in relation to countryside and landscape could also refer to ‘including the Chiltern’s AONB’.
- **CPRE;** agree with broad approach. New development should be allocated to existing urban areas and not in the Green Belt. Extensions to the boundaries of the towns and villages should only occur in exceptional circumstances as required in national policy.
- **Grand Union Investments;** agree with broad approach. Spatial strategy of the growth should have further consideration with regards to infrastructure. Sustainable means of transport should be main focus when considering new growth across the borough. The main centre for development and change is recommended to be Hemel Hempstead. HH, Berkhamsted & Tring should all be considered as the main settlements in hierarchy ensuring the plan is more flexible and is found sound.
- **The Little Cloth Rabbit;** supports GFRA.
- **Plato Property;** consider more thoughtful policy on canal moorings as a location for growth. Agree with settlement hierarchy. Council should not block out opportunity for housing in the ‘rest of the borough’.
- **Berkhamsted Citizens;** agree with overall approach. Options identified in section 10 do not meet the qualities of settlements identified in section 5. Agree with BRAG statement.
- **GFRA;** Tring cannot sustainably support growth as much as Hemel Hempstead can. Berkhamsted and Tring’s character should be preserved. Settlement hierarchy should re-emphasise the fact that significant proportions of growth should be allocated to Hemel Hempstead. This make the most of efficient land and lessens the need to release Green Belt and impact on the AONB.
- **Angle Property;** growth should be distributed across the whole Borough where infrastructure can support it. Residential development is required in all settlements in order to support local services/infrastructure. An appropriate mix of housing subject to the demand in the area should be considered. Growth should meet all planning objectives.
- **Silvershaw Ltd;** difficult to comment further when DBC set out that a final decision on housing requirement to amend the settlement hierarchy cannot be

identified until the levels of planned growth are confirmed. Agree in principle to overall approach. There should be further delineation within the large villages category, given the strong performance of KL as identified in the settlement hierarchy and its significantly higher performance than the other two Large Villages.

- **Linden Homes**; large level of growth (1,000-1,100 new homes a year) is a realistic reflection of the housing need in the area and DBC should be planning for this level of growth despite it not being locally popular. More detailed and refined assessment is required to assess the contribution new growth levels have towards the historic character of existing towns. An amended green belt review is needed without making judgements about SAMs, Flood Risk, AONB etc as it is not appropriate to be included in the green belt review. Site BK – A11 scoring parcel information in Part ii is not correct. Pea Lane site should be considered as a reasonable alternative going forward and justified for inclusion within the Local Plan.
- **C/O Bidwells**; 3 options of growth presented however DBC must be clear within growth approach is most realistic and deliverable against growth objectives. CPUK suggest growth at Tring will provide a sustainable location for development and contribute to improvements to existing infrastructure.
- **Capital & Regional investments**; to reduce impact on climate change, new growth should be in the most sustainable locations. HHTC a highly sustainable location for growth and should be high density, mixed use development in the town centre which could provide sustainable living and working environments. Would require coordination with investment in transport and a new approach to parking standards. This location would also relieve pressure to make Green Belt releases.
- **Millbank Land**; Tring a highly accessible location and can support new growth through a large range of existing infrastructure/services. Investment in existing services in Tring would be of benefit to existing residents also.
- **Gallagher Estates**; while focussing on new development at main settlements it should be recognised that growth should still be allocated in smaller settlements. New growth levels will require release of green belt land. New Mill site in Tring can contribute to 400 new homes. DBC should be considering the highest potential level of growth as the Local Plan looks forward to 2036. To allocate new housing and build new sites with a variety of developers will consequently take a long time, thus expected housing numbers to become higher is likely within the period between LP adoption and 2036. Thus a variety of sites should be considered.
- **MCJ trust**; does not agree with the proposed broad approach to distributing new development. They also do not agree with the outright rejection of any rural growth option. rural growth should be viewed as complementing to those options that have been identified as preferred. It is clearly unrealistic that rural areas could accommodate the entirety of the Borough's objectively assessed need. However, allocating a wide range of small sites across rural settlements will provide a cumulative boost to housing supply without compromising the opportunities presented by development in larger settlements.

- **Kings Langley DRA;** Agree with settlement hierarchy approach however KL cannot cope with more growth on infrastructure grounds. Further co-operation between DBC and TRDC needs to be had to determine the future for the KL settlement as a village.
- **Harrow Estates;** overall approach is flawed as settlement hierarchy indicated Berkhamsted and Tring as second tier developments for growth yet development suggested in Tring is minor. New housing development in Tring in recent years has led to increasing affordability gap and an aging population that is unsustainable in the long term. The new local plan should recognise the inherent sustainability of the settlement and seek to address these existing issues by directing more development to the town. Unrealistic to suggest that expected housing figures for the Borough can be allocated mostly in the main settlement of HH.
- **Bovingdon airport a suitable place for development.**
- Land south of Shendish Manor is not a sustainable place for development. KL infrastructure/service provision is already under strain.
- Traffic between Apsley and Hemel Hempstead needs assessing and better infrastructure provision is needed if growth levels are to be delivered between LP adoption and 2036.
- Queries as to how DBC are conserving green belt land if delivery of new housing numbers is achieved as the current plan suggests.
- Public transport provision in Tring and Berkhamsted currently is not attractive enough to encourage modal shift for existing and new developments.
- Dacorum Borough Council should have a longer term strategy which uses Brownfield sites such the disused airfield at Bovingdon. It should be developed to achieve an holistic solution to the problems by creating; Housing of all types. Areas of recreation, footpaths, cycle ways and allotments A much need new road (just three miles) connecting the Bourne End Junction of the A41 with the Chesham Road to the North West of the airfield thereby relieving the current residential B4505 road of many HGVs and other vehicles. The new road would provide access to the Bovingdon Market and to the TV/Film studios operating there.
- Support for growth to occur particularly in HH town centre as flat buildings could provide easy access to necessary services thus being a sustainable location for growth.
- Hemel Hempstead has not been sufficiently protected, in the face of residential and political opposition from other main settlements across the Borough. Further consideration needs to be given to HH surrounding green belt land and it's close proximity to the AONB.
- LP needs to address how it is going to mitigate risk on flora & fauna, species, biodiversity and habitats. Protected wildlife such as badgers should not be ignored in the face of new growth. The destruction of the green belt is irreversible. Nature is in crisis with species loss, loss of plant diversity. The proposals for HH-h3, KL-h1,h2 & h3, will accelerate this problem in this corner of the borough.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Ensure you set the 'bar high' for development in the first place
- There are other areas to build on instead of Green Belt (i.e. undeveloped areas of UK)
- Reference to the Schedule of Site Assessment stating that '*HH-h1a, HH-h1b and HH-h2 should ALL be excluded from further settlement and retained as Green Belt*' (highly performing Green Belt parcels)
- Village boundaries in 2004 plan should be viewed as definite boundaries – which can't be changed
- Maybe the South East cannot meet the housing demand/pressure placed upon it?
- Relax development in existing settlement to protect designated Green Belt areas
- Development of this scale is not necessary
- Proposals should align to Government policy
- Can other authorities meet some of Dacorum's housing need?
- High density in all locations may not be an acceptable approach e.g. on Green Belt land where the visual impact on surrounding countryside must be considered
- Review of minor inconsistencies / discrepancies in the current Green Belt boundary (to strengthen boundary / ensure its coherent should have been what the Green Belt Stage 1 & 2 work did)
- Design should be sympathetic
- Consider limited development only – where necessary
- Only developers will benefit, damaging for towns and villages where infrastructure is over stretched
- Necessary to retain balanced environment
- Contradiction in capacity and proposals
- Contradiction between the proposed sites and the Green Belt review as some of the sites put forward are not promoted within the review and meet the 5 principles of Green Belt land
- Developments have not provided affordable housing or any s106 agreements, worsens the area for both new and existing residents.
- Development of new settlements further North and encourage movement there
- Development in Kings Langley and Shendish would make Kings Langley a suburb of Hemel Hempstead

- Developing site Be-h3 Ivy House Lane would have a negative impact on adjacent AONB land
- Need to take into account the constraints of the Borough and there needs to be offsetting improvements elsewhere in the Borough in alignment within the Housing White Paper document (February 2017).
- AONB and Green Belt should be protected, limited development to take place here such as the redevelopment of existing buildings, there also needs to be the consideration of the cumulative impacts of development on infrastructure
- Provide homes for smaller households in existing settlements high density low rise flats
- Hertfordshire Garden Trust believe that the value of Green Belt land acting as the setting for heritage assets has not been given enough weight, many of the historic parks and gardens derive some significance from Green Belt settings principles should not be compromised.
- Land allocations appear to be developer led
- Regenerate/ use existing empty land and buildings to meet need.
- Tr-h6 should be excluded and there should be more accurate information on what constitutes high, medium and low density development.
- Use compulsory purchase on sites with existing outlined permission to increase the levels of development
- Increased risk of flooding
- Over development in Berkhamsted believe this is driven by profits rather than which locations are most appropriate
- There has not been sufficient consultation
- Ignoring previous reviews by planning inspectors that the Green Belt around Berkhamsted and Tring should not be removed, and do not have the infrastructure to support a large number of new houses.
- Watson Howick- should allow some flexibility around the areas and boundaries of settlements as it is a logical approach and the benefits of development would outweigh the in-principle negative impact.
- Berkhamsted has already had excessive development over the figures in the Core Strategy whereas Hemel Hempstead has not meet its housing target based on these values.
- Process should give greater weight to the views of local people
- There needs to be consideration of existing housing commitments and its impact on the Green Belt currently
- Consideration of sustainability of each site
- Development in Hemel East and HH-h1b would go against principles
- Development beyond the Green Belt in less constrained new towns should be built around there
- Reports by the Chilterns Society- The cumulative effects of development on the Chilterns AONB and ignored the report put forward by BRAG
- Inconsistency between the Schedule of Site Appraisals and Stage 2 Green Belt Review (2016)

- Should take discrete parcels of land that have already been developed within the Green Belt to ensure that it is protected rather than extending the boundary from settlements
- Condition that developers of large sites should also have to develop some brownfield areas as well
- If Green Belt cannot be protected then there should be other land designated as Green Belt to replace it
- Herts & Middlesex Badger Group- Concerns about the number of developments on Green Belt land and the threat to ancient woodlands and priority habitat hedgerows in the North Hemel area. It is important to retain areas of green space for habitat connectivity and some development would isolate this particularly site HH-h1a and HH-h1b
- Building offices on Green Belt land does not make sense when there are existing empty offices and does not support economic growth
- Building on the edge of villages does not count as limited infilling
- Doubt about the effectiveness of SANGS that will fulfil the 5 functions of the Green Belt cannot replicate existing natural wildlife
- Tring in Transition- Tr-h6 should be removed from further assessment as it is highly constrained by AONB as concluded in the Green Belt Review and Landscape Appraisal (January 2016)
- E.H. Smith C/O Brasier Freeth- redevelopment of Bovington Brickworks for Class B1, B2 and B8 employment uses.
- Consideration of Brexit and how this would affect housing need and increase the need for local food production
- AR Planning- villages like Potten End can be removed from the Green Belt and settlement boundary extended without having any implications on the openness of the Green Belt
- Chiltern Countryside Group- SANGs are not suitable alternatives to Green Belt, and support an array of leisure activities
- Village boundaries need to be made clear so that residents know what would be classed as limited infilling. Example being the Shendish estate and whether this would be considered limited infilling of Kings Langley.
- St Albans Diocesan Board of Finance- do not believe there has been enough consideration for development in the Rural Area beyond the Green Belt and how this could contribute towards housing need
- Should be more consideration of the constraints of the Borough in not being able to meet its housing need. Examples of Councils that have had land constraints and aimed for lower housing targets, whilst still being found sound.
- Housing need for Dacorum will require Green Belt release as this cannot be met within the urban capacity
- Transport issues at Ivy House Lane site

Amendment of Green Belt boundaries so that they are defensible and at a logical position.

Question Number 9

Question Text: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Complies with Government policy, however should be noted that housing need can constitute exceptional circumstances of Green Belt release
- More Green Belt should be used to enable more spacious developments

Question Number 10

Question Text: Do you agree with the proposed approach to the Rural Area summarised above?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

No Supplementary comments

Question Number 10**Question Text: Do you agree with the proposed approach to the Rural Area summarised above?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Unable to say without the revised Green Belt/ Rural Area policies
- No development on Green Belt/ Rural Area
- Need for better transport links through rural area
- Used for self-build that meet high environmental standards
- No area boundaries included
- Consideration of the Chilterns Conservation Board report on the Cumulative Impact of Development on the Chilterns AONB
- Development of new towns instead that would follow the garden city principles
- Affordable and high density housing
- Development should be focused on the large towns
- Infrastructure to support active travel
- Small-scale development to support small businesses, not always a need for community facilities.
- Tring and Berkhamsted have already had substantial growth, Hemel has not
- Development in these proposed areas would put greater strain on infrastructure, where it would be better suited in built up areas.
- Issues of infrastructure and travel in the proposed developments
- Focus development on large towns where infrastructure can support development
- Development to be focused on Hemel Hempstead where it would not damage settlement character
- Consideration has not been given to the Planning Inspectors comments on the Green Belt review
- Wildlife
- Argument that if there are environmental and Green Belt land issues then lower housing numbers can be found sound.

Question Number 11**Question Text: Do you agree with the proposed approach to selecting sites?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Larger sites of +3,000 homes should not be dismissed at this early stage.
- Government and national policy emphasise the importance of protecting the Green Belt.
- The Plan should not consider Green Belt releases.
- Watson Howick support the promotion of site tr-h4 at Station Road/ Cow Lane in the Schedule of Site Appraisal.
- No exceptional circumstances have been proved and that there are no alternatives to building on the Green Belt.
- The CAONB should be protected from development.
- A number of objections raised to sites in Bovingdon, Kings Langley, Berkhamsted, and Tring being promoted through the draft (Issues and Options) Local Plan, particularly merging of settlements, ability of towns/villages to support new development, loss of community identity, historic character, wildlife, farm land (and the need for food security), and rural setting, and urban sprawl.
- Concern raised over suitability and capacity of current local infrastructure.
- Need for infrastructure to be in place before or at the same time as development comes forward.
- The Council should support higher density developments, taller buildings, the reuse of empty buildings, re-occupation of vacant homes, development of surplus public-sector land and conversion of properties to housing.
- A planned new Garden Town/Village should be explored and not ruled out so early.
- Brownfield should have priority over Green Belt sites.
- Sites are being proposed not to meet assessed need but because promoters wish to maximise their own profits.
- Priority should be given to expanding the towns.
- Bovingdon Airfield should be considered for a one-off large development.
- Need to take account of the cumulative impact of small sites/windfalls, particularly on infrastructure.
- Redevelopment of gardens should be discouraged.
- The Canal and River Trust object to the approach to identifying/assessing sites as it affects Wilstone, in the Schedule of Site Appraisals.
- A variety of objections raised to the identification and selection of sites process in the Schedule of Site Appraisals and how it is updated to include new sites put forward through the ongoing call for sites submission.

- Suggestion made as to how the Council could prioritise greenfield sites in Berkhamsted/Northchurch taking into account a range of factors, including accessibility and avoidance of ridge top development and the Chilterns landscape.
- The selection process is not rigorous, requires more detailed criteria, and seems to omit mention of anything related to the ability of the area to support new development through infrastructure and resources, a detailed cost analysis of sites, an assessment of optimal locations, and their suitability/quality.
- The option to keep land to allocate for use in the future seems to be a way to spring future development on residents without further consultation.
- Transport links are poor, local roads are congested and there is insufficient parking.
- Need to explore whether other authorities can help to meet some of the identified development requirement (and then only with the support of local people).
- A number of landowners/agents have made representations in support of schemes being promoted through the Schedule of Site Appraisals.
- Berkhamsted has been over-delivering on new homes and is already near its estimated infrastructure capacity.
- The Open Land designation is restricting the availability of housing development in urban areas.
- Brownfield sites should not result in the loss of local businesses to residential.
- There should have been an option put forward that acknowledges that we have reached capacity.
- Residents are supporting the responses to this question from a range of other organisations, including the Berkhamsted Residents Action Group, Berkhamsted Town Council and the Berkhamsted Citizens Association, Chilterns Countryside Group, the Labour Party, and the Grove Road Residents Association.
- Insufficient public land has been promoted for development.
- Better use of tree-screening could reduce the impact on surrounding areas and actually improve biodiversity.
- Neither the proposed developments in Three Rivers or the 'Two Waters Masterplan' have been taken into account.
- Existing green lungs within the town should be kept intact as far is possible.
- The draft (Issues and Options) Plan is presenting old thinking.
- Need for more affordable and starter homes – and less executive homes.
- A range of suggestions were put forward for alternative development sites including Bovingdon Airfield, the Maylands Business Park, land in Apsley, etc.
- Support for housing options 1A, 1B or 1C in the draft (Issues and Options) Local Plan expressed.
- The approach to the selection of sites has not been clearly defined and the Council should clarify which locations are to be prioritised for the allocation of sites.
- Site selection is heavily influenced by sites available from developers and other interested parties and to that extent is unfairly biased towards those sites.

- Hemel Hempstead could be developed with modular self-contained new communities/villages as an extension to the principals of the original new town plans e.g. this type approach can be seen in Milton Keynes which has all the infrastructure necessary to support such development.
- The Home Builders Federation urge the importance of ensuring a consistent delivery of supply across the plan period, to not overly rely on large strategic sites, and where neighbouring LPAs cannot meet their needs, then any land that is considered suitable for development should be brought forward in this plan and not safeguarded for the future.
- Opportunity at two Tring existing sites for sheltered housing and additional residential home i.e. north of Western Road (this site being very short walk to Tring's health centre, a pharmacy, and some local shops), and Akeman Street (short walk to post office, and small supermarket etc).
- New housing could be built up north or new towns built away from the south east. Why not reinvigorate other parts of the country where land is cheaper?
- The Council needs to be more flexible in consideration of density, housing mix and massing in order to bring forward more SHLAA sites that have so far been prematurely discounted otherwise suitable sites in more sustainable and less harmful locations.
- It is not considered that the brownfield register alone demonstrates a fully exhaustive assessment of brownfield sites and this, together with the consideration of alternative strategies for density, scale and massing needs to be undertaken in a structured manner before any specific consideration of site selection can take place.
- The predominant housing requirements should be located within Hemel Hempstead, given that the infrastructure can support it.
- Should the Plan be reliant upon strategic development sites for delivering the bulk of its housing requirement, a realistic assessment has to be made about their deliverability to ensure that any potential shortfalls are adequately addressed through sufficient allocations being made in the intervening periods.
- The Plan cannot have a strategy where there is reliance on very large strategic allocations, delivering the bulk of the OAN and no provision for intermediate supply between the times it takes for the larger allocations to ultimately be delivered.
- The "priority" given to the development of brownfield land should not be conflated with any potential sequential approach. Paragraph 17 of the framework makes it clear that the requirement is to "encourage" which does not mean give "priority" to brownfield land over green field sites.
- The Chilterns Conference state:
 - Regrets that the LP seeks to challenge and change Green Belt status in the Borough, and importantly, for the setting of the Chilterns AONB.
 - Tring and Berkhamsted, currently fulfil the five functions of the Green Belt. There are no justifiable cause for those essential functions to be considered unnecessary or potentially replaceable by the development of Suitable Alternative Natural Greenspaces (SANGs).
 - There are no very special circumstances for development in Green Belt.

- Green Belt sites particularly on the Eastern edge of Tring are popular for outdoor leisure and recreational activities and provide for wildlife corridors/habitats. The housing options of the draft (Issues and Options) Plan undermine these.
- The Government calls for demonstration that housing needs can be met in other ways eg. release of brown field sites, land banks held by developers where planning permission has been granted but not developed, increased urban density.
- Land at Kier Park, Hemel Hempstead can help contribute towards the supply of housing from brownfield sites.
- It is ironic that at Markyate land is being proposed to be released from the Green Belt, when non Green Belt land in the AONB is in a more sustainable location.
- In the case of the Two Waters and Apsley developments this appears to be an attempt to conceal the potential amount of homes to be constructed in an already densely packed area.
- St Albans Diocesan Board of Finance:
 - agrees with the general approach detailed for site selection set out in the Plan, considering Brownfield sites first, but also supports recognition for a requirement for Greenfield sites to contribute to delivery of growth
 - There is some concern over the level of detail provided with regard to site selection; there is no clear methodology for how sites have been discounted, or carried forward for further consideration.
 - A key concern also is that sites that come forward through the current Call for Sites process will not be given fair consideration over those already considered within the SHLAA, or the Plan itself.
 - A particular concern is the oversight of land within the Rural Area beyond the Green Belt that can contribute to housing needs, and also the sustainable growth of small villages. Of particular interest is land west of Long Marston, identified in the SHLAA as suitable for redevelopment.
- Linden Homes are seeking to promote a site on Pea Lane, Northchurch for housing and argue that its location in the CAONB should not be dismissed.
-
- Capital and Regional state that they are keen to explore the capacity of the town centre for accommodating new residential uses and that there is scope for increasing this figure with more detailed capacity work.
- The Council should update their Green Belt Assessment to remove reference to a Landscape Appraisal, to ensure the methodology is robust.
- Millbank Ltd are supporting promotion of their site at Bulbourne Road, Tring.
- MCJ Trust are supporting promotion of their site at Flaunden.
- The Kings Langley and District Residents Association disagree with the approach to only include sites with a capacity of 10 plus units or a minimum of 0.3 ha in area as specific allocations with plan as Kings Langley has many smaller brownfield sites in and around the village which could be brought forward. They disagree with the approach to selecting sites Green Belt sites. The Council has not properly explored brownfield options (a list of potential sites has been provided), focussed on the town of Hemel Hempstead and the market towns of

Berkhamsted and Tring options and therefore no greenfield or Green Belt sites should be released or allocated.

- Crest Nicholson agree with the broad approach to selecting sites which plans for a variety of sites over the plan period. However they have major concerns regarding the methodology, analysis and conclusions drawn within in the assessment of sites set out in the SA Schedule of Site Appraisals (October 2017), particularly in relation to Land at Blegberry Gardens, Berkhamsted (Site Be- h6).
- Support for the response submitted by the Meadway Residents Action Group (MRAG).
- In allocating greenfield sites for development, greater priority should be given to suitable sites that are not subject to Green Belt or AONB designations.
- Hightown Housing Association state that the key priority for their clients is to ensure sufficient sites are identified to meet identified need for the full range of housing types, particularly affordable housing and housing for older persons.
- Waterside Way Sustainable Planning Ltd support the site selection approach.
- Gallagher Estates support the approach to selecting sites, but is disappointed that there is not a table summarising the potential yield from each location to determine the share of homes available for each location,. that the final selection of sites is soundly based on the evidence produced, and that there are enough sites selected and allocated for development to ensure that unforeseen delays at one or more sites do not threaten the delivery of the housing, jobs, facilities and services the Borough needs.
- Sport England seeks to ensure that care is taken not to include any playing field sites within this allocation.
- Markyate Parish Council believe that all development, save that to meet local needs should be in the urban areas, with much located close to transport hubs to meet the needs of commuters into London. They have suggested development opportunities for affordable housing at the approach to the village along Buckwood Road from Studham, and at Caddington Hall, Slip End Road (not considered to be not be an appropriate site for general housing).
- The potential significant release of Green Belt land in the town runs counter to existing policies in the Core Strategy and that of the approach of the Core Strategy Inquiry Inspector.
- It is illogical to exclude large sites in excess of 3000 as they provide the best opportunity to provide the necessary additional infrastructure.
- The current household build rate per annum in Berkhamsted and Northchurch is significantly above target and the town is already near its estimated infrastructure capacity. These points must be taken into account when assessing the allocation of development numbers across the Borough and site options.
- The cumulative impact of small scale developments, including windfall, on infrastructure requirements should be assessed especially in our market towns.
- Support the maximisation of brownfield sites for development.
- Gardens are “Greenfield” sites and development should be discouraged as indicated in the Government white paper.

- Strongly support development of brownfield sites before Green Belt sites are considered.
- The inclusion of higher density developments in appropriate areas of Hemel Hempstead is not addressed in any detail in the proposed approach e.g. taller buildings in appropriate areas will enable higher urban capacities and reduce pressure on the Green Belt.
- It will be important to ensure that as well as considering the conclusions of the Green Belt review and Sustainability appraisal, that the suitability, availability and deliverability of the sites and their ability to contribute to meeting supporting infrastructure requirements is considered as part of the new Plan.
- Dunsley Farm. While we support the fundamental approach to site selection set out in the Issues and options consultation, we believe that the potentially developable area at Dunsley Farm has been arbitrarily constrained in the stage 2 Green Belt and Landscape review. In addition the arbitrary selection of the potential new boundary ignores that certain land uses, for example playing fields, would preserve the fundamental openness of the Green belt and preserves the openness of that part of the site in perpetuity. Greater use could be made of the site, with open space or playing fields preserving the openness of significant elements of the site to the south east boundary with London Road and Cow Lane.
- Wayside Farm. High level landscape and visual impact assessment suggests that the potentially developable areas of the site are limited to the more low lying parts of the site. Similarly, the high level highways advice suggests that there are issues of highways capacity at the south end of Kings Langley, on the A4251 Watford Road and associated with Junction 20 of the M25 with the A41/A4251. The suggestion is that these will need to be addressed in order to realise the sites development potential at the scale envisaged by the Local Planning Authority in the Issues and Options consultation document. The approach to the Local Plan, potentially of safeguarding land or identifying reserve sites is considered to be prudent and worth further discussion. Given its proximity to Kings Langley railway station, it is considered that the site has the potential to appeal to be commercially attractive to a range of employment occupiers.
- Hertfordshire County Council (Public Health) ask that the Local Plan should set out a policy requirement that all development proposals undertake a Health Impact Assessment at an early stage – and that this should be done in parallel with other required tools used to assess the likely effects of the development when judged against reasonable alternatives.
- Hertfordshire County Council:
 - support the approach of maximising development on brownfield sites and continuing renewal of Hemel Hempstead.
 - It needs to be recognised that the lower the density of development on urban brownfield sites, the more greenfield development must come forward.
 - Spreading development at lower density across more sites risks a more diffuse investment in improving infrastructure and a more car dependent form of development which is not consistent with the Vision put forward.

- Whether brownfield or greenfield, failing to allocate and deliver more homes on the most accessible and sustainable sites (or those that can be made so) will ultimately mean this development has to be put in less accessible and sustainable locations in transport terms, and providing new or improved infrastructure will potentially be more difficult to achieve in financial and viability terms; this means the transport impacts are likely to be more difficult to manage.
- Large sites may take a long time to come forward and may require significant new infrastructure – appropriate timescales needed for planning infrastructure, services and facilities need to be incorporated to ensure development that comes forward is sustainable.
- The Natural, Historic & Built Environment Advisory Team recommends that the historic environment is a consideration in the approach to selecting sites. This is because heritage assets with high significance may be a constraint on development. This can be the case if they are designated, but also if they are undesignated but it has been demonstrated that they have equivalent significance to scheduled monuments (NPPF paragraph 139). It is possible for currently unknown heritage assets to be present which may have this level of significance.
- Encourage policies and guidance to promote urban Green Infrastructure interventions, including street trees and planting to provide urban cooling, air, soil and water regulation, sustainable drainage systems e.g. rain gardens, green walls and green roofs (as public open space, private gardens, allotments, or wildlife areas/stepping stones) multifunctional open space as temporary flood storage, play and recreation space.
- The location, layout and design of any new settlements or settlement extensions should be informed by landscape and visual impact assessments, landscape sensitivity and capacity studies, and site surveys and analysis, to ensure that development can be accommodated without causing unacceptable harm to landscape character, important landscape features, and visual amenity.

Question Number 11**Question Text: Do you agree with the proposed approach to selecting sites?****YES**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- A number of respondents were supportive of the approach but with caveats (as listed below).
- Lucas site is in need of development, not sure about housing though due to its proximity to Buncefield, however, a full Medical Centre/Hospital would be a good choice.
- All brownfield opportunities should be explored and maximised, and should be given priority over Green Belt sites.
- Allow higher density housing where appropriate in Hemel Hempstead until Hemel has caught up with other areas in terms of housing development.
- It is illogical to exclude large sites where delivery could be piecemeal but overall plan-led.
- The AONB should have the highest level of protection.
- The Council has not maximised all brownfield opportunities.
- Brownfield should have priority over Green Belt sites.
- Green Belt development should be a last resort.
- Premier Property Acquisitions generally agree to the approach set out and that it is right that the Local Plan is realistic about that quantum of development that can be secured during the plan period from very large scale development, especially where hundreds or thousands of houses are proposed on strategic sites in one ownership.
- Consideration also needs to be given as to whether sites are likely to provide sufficient affordable housing.
- The Chilterns Conservation Board supports the approach to maximise use of brownfield sites, and identifying the AONB as a very important factor in assessing where development should be located. The Council should undertake further detailed work on the impacts of developing sites (both individually and cumulatively) on the Chilterns AONB. They would be willing to assist with the scope and brief for such work, which should include landscape and visual impact assessment as well as coverage of effects on tranquillity, ecology, water abstraction from chalk streams, air quality, dark skies etc.
- Need to increase densities.
- When sites are put forward for consideration they must also be sustainable in terms of the local infrastructure. They must respect the character of the local environment which has developed over the previous generations.

- Green Belt land was created to protect the environment, wildlife and to distinguish villages from being merged into towns and losing their identity.
- Support from residents for the response to this question from Berkhamsted Residents Action Group.
- A planned new Garden Town should be explored.
- It is illogical to exclude strategic sites of over +3,000 homes.
- The cumulative impact of small scale developments including windfall on infrastructure requirements cannot be underestimated and should be assessed especially in the market towns.
- Gardens are “greenfield” sites and their development should be discouraged.
- The need for higher density developments in appropriate areas of Hemel is not addressed in any detail in the proposed approach.
- More emphasis on taller buildings in appropriate areas will reduce the pressure on Green Belt.
- The Chiltern Society supports the proposed hierarchy and particularly the proposal to maximise the use of brownfield sites ahead of greenfield sites.
- The Government is clear that the Green Belt should be protected.
- Any future development should avoid coalescence between Kings Langley / Hemel Hempstead and neighbouring towns this is not fully recognised in some options.
- There are not any more brown field sites in Tring, but there does seem to be many back gardens having small developments.
- Leverstock Green Village Association urges that more is done to utilise every available brownfield site before any consideration is given to building on Green Belt.
- Ashill Land Ltd support the Council’s approach to maximise the use of brownfield sites and that the Council should look to fully explore housing delivery from such sites, including allocating sites with a capacity of 10+ dwellings and/or a minimum of 0.3Ha within the emerging Local Plan.
- Kier Property strongly agree with that Brownfield sites must be utilised to their full potential in accordance with the core planning principles set out in paragraph 17 of the NPPF and they consider Hemel Hempstead as the most appropriate location given its positioning at the top of the settlement hierarchy.
- Support by residents for representations to this question from Tring Town Council.
- A recent report by the Chilterns Conservation Board on the Cumulative Impact of Development on the Chilterns AONB has not been considered and should be taken into account.
- Support by residents for representations to this question from The Chilterns Conservation Board.
- Support identifying the AONB as a very important factor in assessing where development should be located.
- Angle Property Ltd supports the promotion of development on brownfield sites as a priority, but considers that the Plan should recognise that some brownfield sites are located within the Green Belt. Where such sites are located adjoining or close

to existing settlements, and well related to the facilities and services of nearby centres, development of such sites should be prioritised.

- Majesticare Ltd welcome the approach to plan for a variety of sites over the plan period (up to 2036) to ensure a steady release of land and to promote opportunities for a range of developers and are promoting land at Spring Garden Lane for the development of a care home that meets the identified needs of Berkhamsted and the borough as a whole.
- Audley Court Ltd welcome the approach to plan for a variety of sites over the plan period (up to 2036) to ensure a steady release of land and to promote opportunities for a range of developers and are promoting land at Bank Mill Lane, Berkhamsted for the development of a care home.
- Tring Town Council are concerned that the process of identifying sites is skewed towards the most aggressive developers who are purely profit motivated. Effort should be made to secure sites which would be most beneficial to the settlement/surrounding area in light of the various strategies and visions – sites which have not been forthcoming during the 'call-for-sites' exercise.

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- Improve public toilets at Tring Station
- Issues & Options only indicates generic transport statements regarding capacity on the road and rail network but does not prioritise these issue

Question Number 12

Question Text: Do you think we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- Air pollution not fully considered – Apsley is pollution highlighted as due to narrow valley – adding more houses in the area – how will this be mitigated
- Need to increase capacity on rail network – double decker trains / new additional line to Euston
- Comprehensive road improvement programme required
- Constant utility works increase the traffic congestion
- More traffic congestion – results in more traffic air pollution
- M1 & M25 managed by Highways England – A roads by Herts CC – bus and train routes by private companies – therefore out of DBC control
- The intended shift from car to other travel methods if it takes place – will be far slower than the growth of development and therefore road congestion will only increase
- Retail shopping habits changing (to online – deliveries) will only increase the volume of traffic on the roads and local roads at all times of the day not just peak times
- Benefits of affordable housing do not away the negatives of planned development spoiling our Areas of Natural Beauty and historic and natural environment.
- Box lane & Chesham road are the busiest B roads in Hertfordshire and Herts CC have not taken any action to improve it, no confidence in Herts CC to provide effective strategies.
- Transport infrastructure should be a priority for Dacorum and not purely based on planned growth in specific areas
- Trains over priced, overcrowded, and insufficient parking -
- The Local Plan states it will consider the transport issues – but no evidence it will actually action them
- No plans to demonstrate how roads and transport can be improved to cope with current population and therefore nothing to demonstrate ability to cope with growth – roads, doctors, dentist , parking
- Plans fails to demonstrate how it will improve, increase Affordable housing for “key workers”
- Key transport issues are out of DBC control, however Local Plan does not provide and plans. Proposals to alleviate current issues

- Any development north of Berkhamsted must propose a new North / South crossing of the canal and railway line
- Air pollution doesn't appear to be being considered
- HCC provides "high level plan" but do not focus on local issues
Air pollution growth should not be considered until air pollution is sorted – scoping document refers to "All the key roads in south-west Hertfordshire are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy"
- Consider electric bike hire scheme
- Developers renege on conditions of development and do not provide the required infrastructure
- Need more safe cycle lanes
- Air pollution is increased with more and more congestion , standing traffic
- If not directly responsible for Road Infrastructure what is Dacorum Borough Council doing to force Herts county Council highways to provide appropriate schemes, strategies, actions like east west link roads ?
- Consider 24 hour tram service form Hemel Hempstead centre to outlying settlements in Dacorum
- Consider new junction onto A41
- Moor end roundabout to Water End – already heavy congestion at peak times – Marchmont Fields (La1) still to be developed and adding HH1-a & b, HH-h2 will only make things worse
- Hemel Hempstead is the major town in Dacorum and its infrastructure is best placed to absorb growth, help with regeneration of the area
- Improve Box Lane junction
- Policy 57 in 2011 Local Plan – Laudable re parking provision to discourage car ownership – but not practicable considering the geography of the area
- GP services unable to cope with current levels of population in KL – no room for growth
- Align with BEIS Clean Growth Strategy (October, 2017)
- Development to look at reducing car parking availability, and locate this near good public transport links
- Chiltern Countryside Group- Proposed expansion of Luton and Heathrow raise concern from increased traffic, air and noise pollution
- Infrastructure proposals are generalised and not integrated across the different providers, sites should only be considered when funded plans are in place to provide the necessary infrastructure and improvements
- St Albans Diocesan Board of Finance- Do not believe that option 2c is not suitable growth strategy, believe that options 1c and 3 should also be tested as a comparison, there also needs to be consideration of cross-boundary matters specifically commuting patterns.
- Chilterns Conservation Board Cumulative Impact of Development on the Chilterns AONB has not been considered, air quality effects on wildlife and rarer species- proximity of Chilterns Beechwoods Special Area of Conservation and the road network makes this a particular issue.

- A number of Rights of Way would be impacted by some of the developments according to the County map, work with HCC and Rights of Way Officer regarding any changes that would likely be made to these.
- Emphasis on focusing development around public transport hubs and railway stations to encourage public transport use in alignment with Government guidance- makes sense to focus development around the train stations in Hemel Hempstead

Question Number 13

Question Text: Do you agree with the proposed approach to ensuring good quality design within Dacorum.

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Need to take careful and sympathetic consideration to the existing environment.
- How will these guidelines be enforced? And how will we regulate developers?
- Design needs to think of roads and transport infrastructure
- Also a concern about how parking will be suitably designed.
- Development needs to be in keeping with historic character.
- Guidelines have to be followed on every scale.
- Involve residents with design of any developments.
- Suggested that there is a new focus on mini homes and “flat pack” housing, providing a low cost affordable alternative.
- Home are designed to fit an executive, unaffordable, home model, which is not appropriate.
- Add solar panels, carbon neutral and low energy homes. Explore new methods of sustainable design.
- Dacorum should have its own core set of sustainable design principles.
- <http://projects.bre.co.uk/envbuild/index.html> - example of environmental building.
- Sustainable and visionary design – goes beyond the aesthetic.
- Too much concern on how places look rather than how they work.
- Quality design not seen in practice – developers usually “cut and paste” designs. Used Hemel as an example of bad design.
- Should use natural and locally sourced materials.
- Need to think about through life operating, maintenance and ageing of the design.
- Cannot just be high density flats to make up housing numbers. There needs to be a suitable mix of homes.

Question Number 13

Question Text: Do you agree with the proposed approach to ensuring good quality design within Dacorum.

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Design is all about hitting number targets and maximising developer profits. There is no regard for what people actually need
- Recent developments have been poor quality. Small Garages and one parking space per house.
- No regards for bin storage (wheelie bins in road do not look pretty).
- Lack of sustainable building. Not embracing low energy design.
- There is a major focus on executive house building (maximise developer profits) need more first time buyer properties, sheltered accommodation and specialised housing for the elderly.
- Need better regulations as now “affordable” housing is leading to developers cutting corners.
- There should be design considerations and percentages for which type of housing is needed and in what areas. Where the demand for different types of housing is (luxury for commuters, social housing, homes for the elderly etc).
- Not enough family friendly housing. Private gardens and more than one parking space.
- Affordable housing mainly focuses on flats and small terraced housing, has no regard for expanding families.
- Not forward thinking, only concern is to meet targets.
- As house prices rise, more people are using flats as the family home – therefore they need more space and parking provisions, to be made less crowded and healthier spaces to live.
- Developers only build “Sub-standard Lego housing” and have no care about quality or existing character.
- Saying traffic from development can be accommodated on the existing transport infrastructure is not correct at all.
- Building homes for London commuters, not for local residents.
- Building different types of housing in certain developments leads to social segregation (eg. Only having affordable housing in one area, and luxury in another).
- Not enough focus on the environment, plant more trees and use local materials.
- No vision for the future.
- Lack of ethical building, could use apprentices or those looking for work to help build and plan.
- Local government has lost its control to developers.
- No such thing as “high quality affordable housing” it is an oxymoron.

- CABA Design reviews should be undertaken for all future developments. this would lift the current mediocre design standards that are being adopted by most developers.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

YES

If no, please explain what we have missed and why it should be included.

- **Little Gaddesden Parish Council;** no comment.
- **Berkhamsted TC;** do not agree with list of titles. Consider report by Chilterns AONB ‘Cumulative Impacts of Development on the Chilterns AONB’. SPG, inc Character Area Appraisals should continue to be used.
- **Historic England;** scheduled monuments to be explicitly mentioned in the policy title along with archaeological remains.
- **Canal and River Trust;** willing to work with DBC to ensure all issues along the GUC are considered to relevant new policy. Must address multi-functionality of GUC and cross boundary nature. Listed items to be included in the policy These policies helped formed by TCPA.
- **BRAG;** cannot disagree with a list of titles. Not enough content provided. More content to be provided before decisions are made on sites.
- **D B Land and Planning;** clear policy guidance for development at Markyate needed.
- **The Crown Estate;** new policies need to be framed to ensure quality development, but not become hurdles to be overcome in master planning processes which ultimately delays developments.
- **Little Cloth Rabbit;** agree with GFRA.
- **Berkhamsted Citizens;** not enough content provided. Excellent character appraisals needed which must be adhered to.
- **GFRA;** as long as the policies are applied correctly then they are suitable for new Local Plan.
- **Majesticare LTD;** in support of the following in particular ⁱ
- **Gallagher Estates;** will comment further once drafts made publicly available.
- New policies restrict building on Green Belt around Kings Langley.
- Provide for technology advancements in the future.
- Ensure policies provide for the character of the area, especially Berkhamsted & Tring.
- Local plan policies lack vision.
- Building 500 houses in Tring will ruin the character of the area.

Question Number 14

Question Text: “Do you agree with the list of suggested policies for the new Local Plan, set out in Appendix A?”

NO

If no, please explain what we have missed and why it should be included.

- **Hightown Housing Association;** no mention of character appraisals – makes important contribution to a sense of place and identity. Need to provide policy for older persons.
- **Tring in Transition;** should as a minimum provide plans for a ‘low carbon future’ as required in NPPF ‘Achieving Sustainable Development’. ‘Renewable energy’ policy needs to adhere to NPPF. Consider using S106 to part fund renewable energy schemes. ‘New housing’ policy needs to include good design and high housing quality standards. Encourage co-housing and self build using sustainable materials. ‘Affordable homes’ policy must include policies on starter homes with monitoring to ensure affordable homes are actually delivered against viability issues. ‘Accessible housing’ policy required for wheelchair users. Economy needs policies on ‘low cost business space’ and on ‘affordable work spaces’. ‘Utility and communication infrastructure’ needs a policy including lower water usage per capita to ensure sustainable drainage. ‘Waste’ policy to support local economy. ‘Community care’ policy to be supported by specialist accommodation, particularly for the elderly.
- **Plato Property;** policy to be introduced to deal with provision of new mooring basins for residential & tourist use. Need for new mooring basins for both residents & tourists apparent for proposed land south east of London Road. Opportunity to deliver this site as mixed use if brought forward.
- **Taylor Wimpey;** no sufficient evidence to support housing size and mix. Must justify this with sufficient evidence.
- **St William Homes;** optimise brownfield sites.
- Do not turn KL into ‘South Hemel Hempstead’.
- Do not build on green belt land.
- Too many agencies are involved making policies bias towards differing peoples own agendas.
- Keep rural areas as rural in particular Berkhamsted, Tring & KL.
- No transport plan for Bovingdon/.
- Character of areas such as KL is not considered alongside land use. Visual & social amenity or the ‘worth’ to village residents. This is as well as rural villages in the borough’s role in history.
- Transport plans out of date. Implication of LA3 impacting access to the A41 never tested when considering LA3 transport implications on the borough.
- Villager’s voices not being listened to or heard.

- Concern that houses built in Berkhamsted (on the outside edge) will be seen as 'rabbit hutches' and densely compacted to meet housing requirements.
- More emphasis should be made on integrating and improving public footpaths & byways and ensuring green infrastructure and sustainable methods of transport are easily accessible and well connected.
- Residents should be consulted on what new local amenities should be brought to the area to truly understand the demand in the area.
- Make use of brick, slate, wooden sash windows and chimneys in design of new housing to help in keep with local area character.
- Include policy to reduce air and light pollution for local residents.
- More consideration for creation and protection of green wildlife corridors linking green spaces and movement of wildlife. Policies to prevent isolation of wildlife lessening the risk of local extinction. Developers to provide funding for developing wildlife areas and corridors and provide suitable, informed alternative solutions if development takes place.
- Most policies don't support the proposals in the document.
- No policy on adequate parking facilities for new developments.
- Nothing on waste in policies.
- Lacks out of borough policies that inform plans such as SADC, Luton, and Watford.
- No mention of NHS when considering/justifying policies.
- Policies preventing RTB.
- Policies to make sure of local builders keeping good economy in the area.
- Impact statement should be produced for existing users and residents of the loss of green belt sites, for examples, Wayside Farm.
- Transport and parking policies out of date. Local Plan is far from 'future-proofed' in particular with regards to transport and digital infrastructure in the borough. DBC way behind other local authority transport plans.
- Remove shared equity policy. Affordable housing policy to be based on local needs and perceptions of affordability rather than based off of current market value.
- All new properties should be provided with fibre connections and at least one circuit capable of delivering a current needs to charge modern electric vehicles.
- Police should approve affordable and social homes design, with 'secured by design' in mind to reduce risk of burglaries by 50-75% and therefore reducing the demand on the police.
- Policies are too generic and too much scope for developers to find 'loop holes' to not have to abide by.
- Taller structures to be limited to HH.
- More evidence to support informing policies on size and mix of housing in new developments.
- A further policy on mineral safeguarding.
- DBC to ensure policies support Herts LTP and SWHG&T Plan objectives. Natural, Historic & Built environment advisory team recommends policies included on conservation and historic environment inclusive of historic landscapes.

Question Number 15

Question Text: Do you agree with the definition of the Housing Market Area, as shown in the Strategic Housing Market assessment?

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with evidence.

- The main emphasis should be on economic development.
- More information on housing need should be provided.
- Growth should be diverted to other parts of the country, such as the north and the south west.
- Hemel Hempstead has a different character than the rest of the Borough, so should be treated as a separate area.
- The significant majority of housing allocation proposed for Dacorum should take place within Hemel Hempstead.

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? A) The Government's draft figure of 602 homes a year

Please explain your answer with reference to any evidence.

- There is no mention how an ageing population will be dealt with and their greater reliance on medical services
- No logical assessment of the numbers, undertake analysis of the additional homes needed based on population growth, age and waiting list
- No relation to local need for new housing
- Mix should be targeted towards affordable housing
- This figure until the number of planning consents is known, and this can be compared to draft figure to see how much housing is needed
- Should be fairer distribution of housing across the country
- Agree with this figure providing this is the maximum value
- This approach would have the best understanding of housing need and would include a margin
- This figure makes the most sense until more credible data can be found, windfall and actual demand
- No nationally agreed methodology for calculating housing need, this should be revisited and should take consideration of existing commitments
- Numbers should be considered over the plans life rather than an annual basis
- Rejection of site HH-h2 and HH-h1a would not be acceptable, as stated within the Stage 2 Green Belt review and Landscape appraisal
- Cap of 756 should be imposed

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? B) The figure of 756 homes a year

Please explain your answer with reference to any evidence.

No supplementary comments

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? C) The figure of 1,000 to 1,100 homes a year from the Government's draft standard formula

Please explain your answer with reference to any evidence.

- Hightown Housing Association- This is supported on the context of an aging population plan.

Question Number 16

Question Text: Which figure of housing need do you think is the most reasonable to use as the starting point when setting our housing target? D) Another figure (please specify)

Please explain your answer with reference to any evidence.

- Why is there no consideration of developing employment and associated housing outside the South East maximum that should be considered is the Government draft figure.
- 500 a year is more realistic and achievable. St Albans should be included within the housing market area and infrastructure costs should be shared between the two authorities
- Cannot generalise numbers in this way as it will have to be decided on a case by case basis
- No further housing
- Politics and lower birth rates suggest these figures need to be amended
- Growth in Berkhamsted has been higher than necessary and so there should be less pressure placed on the market towns
- Do not believe supply and demand approach is appropriate stricter requirements on affordable housing 50% should take account of current infrastructure capacity numbers should only be taken when investment from other authorities is provided for infrastructure.
- Replacement of old housing stock at higher density
- Trying to promote higher numbers than required by Government
- Distribution of development is unfair and misleading based on these housing figures
- Should promote new settlements that can provide employment, housing and infrastructure etc. more appropriate than infilling
- No data on the changes to existing stock or redevelopment of business properties, just building new homes does not address new accommodation needs
- Compromise between Core Strategy and draft Government figure
- No private rents, needs to be more social housing to address these issues
- No way for developers to provide more affordable and still make a profit, increase in council build if this money could be borrowed
- Develop away from South East
- Contributions to be spend on improving services in Berkhamsted
- Lowest figures should be chosen to draw people further North in alignment with Government policy/plans
- Targets should not be based on estimated values
- Concern about how these figures are reached
- Important that the land constraints are accurately assessed
- Housing growth rates are based on out of date population figures

Question Number - 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- 1-2 beds which are affordable should be houses rather than flats to provide gardens and other amenities to support young families.
- Further control over developers should be implemented to avoid ‘non-viability’ arguments. Developers should also not be allowed to buy out their affordable homes which occurs regularly.
- Affordable housing needed in Berkhamsted and Tring as well as HH.
- DBC should be the developer more – and build affordable homes in a more attractive area, not in areas such as Maylands industrial area.
- Ivy House lane able to provide 40% affordable homes.
- More of an emphasis on starter homes.
- Local people should have ‘first pick’ of the new housing being built in the area, and should solely have access to the entire affordable housing being built, prior to them being put on the market to inward migration.
- All brownfield sites should concentrate solely on delivering affordable housing.
- **The Crown Estate**; increase in AH percentage should be subject to careful viability testing, especially for significant sites who are expected to make significant contributions to infrastructure. TCE willing to provide assistance with viability testing process.

Question Number - 17

Question Text: “Do you agree with the proposed approach to affordable housing?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **Sports England;** *NOT RELEVANT TO THE QUESTION* no playing fields should be on the brownfield land register as the land is still in use and will continue to be.
- **Dacorum Env Forum Waste Group;** see response to 16 & 36.
- **Home Builders Federation;** DBC must ensure that where AH policy is found unviable on a particular site then they will remove the policy requirement for that particular site.
- **Tring in Transition;** Support privately owned land para 6.3.11. Want 50% affordable housing with a mix of AH and starter homes. Ensure those earning under national average wage of £27,000 a year in local area get first ‘pick’ of housing. Downsizing by elderly people not addressed. Clear definitions of AH and ‘starter homes’ needed in the SLP.
- **CPRE – Herts Society;** sufficient types and tenures to support variety of people in society who need AH. All housing provisions, big or small should allow for AH as a policy that developers have to follow. Social housing should also be supported.
- **Little Cloth Rabbit;** support GFRA.
- **Plato Property Investments LLP;** 40% affordable housing not reasonable. 35% allocation is far more supported and realistic. Viability costs of unallocated greenfield sites will be the same as allocated sites, therefore an uplift in affordable housing is not reasonable or justified. Consider residential mooring to support housing needs.
- **Countryside Properties Bidwells;** further research to inform required tenure in the borough, as this can have a great impact on viability. Flexibility of the policy requirement on affordable housing should be brought forward.
- **HH Labour party;** should be full assessments of tenure need across the borough as well as affordability figures both for rental and purchased properties. Agreed percentage needed to avoid ‘non-viability’ arguments with developers. No flexibility in figure should be implemented.
- **Gallagher Estate;** affordable housing needs should be a reflection of current needs of the borough. However, AH percentages should be considered against viability assessments and current allocated sites ongoing viability issues. CIL also impacts viability assessments, adding to viability issues. Highest level of growth would provide 33.3% of homes to be affordable, the closest percentage to meeting AH needs. The highest level of growth should therefore be favoured when considering AH needs in the borough.

- **Berkhamsted Schools Group;** 35% reasonable, same as London LP. Haslam Fields to provide affordable housing opportunities of 40%, equating to 32 to 40 affordable homes depending on determined AH percentage. Local AH in the area is low and house prices means it is difficult to recruit staff. Possible that Haslam Fields will provide staff accommodation that is affordable.
- Should be higher when considering local wages and increasing living costs.
- Much more emphasis on social housing.
- Developers should pay a penalty fee if affordable housing is not provided.
- Higher percentage of social and AH focused for local young people.
- Stop buying to let
- Definition for affordable housing needed.
- Affordable housing will not be genuinely affordable.
- Housing charities to develop more housing rather than profit based organisation.
- Housing tenures such as flats for over 55's and luxury homes should not remain a priority.
- If you are building on green belt then 40% AH should not be a target, more compulsory.
- Tenure of affordable housing cannot just be 1 bedroom/2 bed flats in inconvenient locations.
- No evidence as to why young people need to be remain in the area. Historically, to get on the housing ladder, younger people had to move to less desirable areas to get on the housing ladder.

Question Number 18

Question Text: Do you agree with the proposed approach to planning for specific types of housing?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- **Berkhamsted Residents Action Group (BRAG) and Berkhamsted Citizens** support the planned approach to specific housing, but suggest that there is a need for more one-person elderly accommodation in low relief areas in the centre of Berkhamsted with good accessibility to local facilities along public transport routes.
- **Grand Union Investments** state that the SHMA should form the basis of Dacorum's approach to the size, type, tenure and range of housing planned for. Generally, they support the approach that larger greenfield sites are more likely to provide opportunities for family homes; but stress that the housing market is dynamic and any policy prescription on housing mix should be sufficiently flexible to allow for new up to date evidence to be taken account at the time that planning applications come forward.
- **Taylor Wimpy Strategic Land** support the Council's continued assessment of specialist accommodation separately from its general housing needs to ensure this need is properly met through the Local Plan.
- **Gladman Development Limited** state that the Local Plan needs to deliver a wide range of housing types for all sections of the community, especially accommodation for older people. Dacorum should strongly consider including a specific policy in relation to the provision of specialist accommodation for older people in the Local Plan.
- **St Albans Diocesan Board of Finance** recognises the issues associated with an ageing population and support Dacorum's provision of housing to target the specific needs of groups within the population.
- **Majesticare Limited** strongly support Dacorum's proposed approach to planning for specific types of housing and especially the focus on accommodation for older people and nursing care. The Issues and Options document relies on SHMA data from 2013. In order to meet Dacorum's need for residential extra-care and nursing care bed spaces, the Local Plan must respond to the increasing demand for elderly accommodation and allocate sites for delivering specialist care homes and care units within mixed use developments. The site at Spring Garden Lane, Shootersway should be allocated in the Local Plan for the delivery of a high quality nursing and care home facility for older people.
- **Audley Court Limited** propose that the site at Bank Mill Lane should be allocated for the delivery of a high quality care community to assist in meeting the specialist housing needs of Berkhamsted and Dacorum as a whole.
- **Hightown Housing Association** support the planned approach to specialist accommodation for older persons. However, the Local Plan should include a

specific policy and site allocations for elderly accommodation, rather than considering general needs housing allocations.

- A survey of local people is required to understand the demand and the availability of suitable housing stock; whilst helping inform decisions on the appropriate mix of specialist housing in development schemes.
- Support for active policy making for multi occupancy housing, self-building and other small scale unconventional development.
- A better level of planning is required for delivering the right numbers and type of housing stocks, including Traveller's sites and housing for the ageing population which is both affordable and well placed for the right level of facilities.
- Local neighbourhood plans would determine local needs.
- Homes for older people should be built for adaptability, to allow people to live in their homes for as long as possible and for future conversion to flats.
- Serviced land should be pursued and made more widely known.
- Self-build cooperatives might be encouraged.
- It is important that the local plan sets out how the need for specialist older person accommodation will be met and that the Council identifies the scale of housing needed for all types of housing, including older people.
- Berkhamsted has limited provision for one-person accommodation and this needs to be addressed in the Local Plan.
- Land allocated for one-person elderly accommodation in Berkhamsted should be zoned into small land parcels to enable small builders to develop the land, rather than relying wholly on national housebuilders. Sites on ridge tops or at a distance from Berkhamsted town centre should not be considered, instead increasing urban density is a rational approach.
- Foyer Work/live affordable accommodation should be considered to encourage younger people to live and work in the Borough.
- Low impact buildings should be classified as a specific type of dwelling.
- The provision of sufficient infrastructure is needed alongside the development of specific housing types
- The new housing developments being built will largely be bought up by investors looking to rent, resulting in a level of housing growth that is greater than is needed in the UK.

Support the approach to specific housing types subject to market considerations.

Question Number 18**Question Text: Do you agree with the proposed approach to planning for specific types of housing?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- **Hemel Hempstead Constituency Labour Party** request that further detailed, statistical analysis on housing size and need across Dacorum is undertaken in collaboration with local community groups; the housing needs of local families should be assessed to ensure that the appropriate housing size and type is provisioned for, rather than developing small 1-2 bed flats. There is a lack of suitable accommodation to enable downsizing into smaller or sheltered housing (for purchase or rental). Moreover, Dacorum should ensure that all properties for sale are freehold and do not increase ground rents.
- **DLP Planning Limited** state that the draft Local Plan makes little provision for suitable accommodation for older people. Consideration should be given to include a policy in the Local Plan to support the provision of suitable accommodation for older people. The provision of age-restricted/retirement properties on DLP's client land located to the west of Bushfield Road, Bovington (BV-A3) should be considered.
- **Inspire Villages Group** suggests that there is a significant undershoot of potential demand for elderly accommodation (especially older people looking to downsize) as the quantitative assessment for the requirement of specialist housing in the SHMA is incorrectly derived. There are both social and economic benefits of providing smaller residential homes for elderly residents looking to downsize: reduction in old-age loneliness and a release of equity from selling large family homes. Robust, use-specific policy and discrete provision/allocations are necessary for the plan to be effective. Windfall provision is simply unrealistic due to the critical mass involved (no less than 4.5 hectares/150 units) in the on-site facilities which are required. A suggested policy approach has been provided in a supporting statement.
- **Tring in Transition** refer to there being no specialist care for older persons in Tring and suggest that two sites in Tring (land north of Western Road, and Akeman Street) would be suitable for the provision of sheltered housing. Support for a new residential, dementia and nursing care facility (combined) in Tring as a condition of planning at site Tr-h5 as it is the nearest site to key services and bus routes. At least 10% of new dwellings should be built to Building Regs M4(3) "Wheelchair user dwellings"; all other dwellings built to meet Building Regs M4(2) "accessible and adaptable dwellings". Specialist accommodation for older people either needs to be very near and well connected to a regular bus service; or be very close to social infrastructure such as a doctor's surgery or a health centre pharmacy.

- **Gallagher Estates** suggest that the line between homes and residential institutions should be observed, and beds in residential institutions are not included in objectively assessed housing need calculations. Moreover, it would be prudent to adopt specific local plan policies with respect to the need and supply of residential institutions in the Borough.
- Need for accommodation for the elderly who do not yet need nursing care. New elderly accommodation must be integrated into the greater community.
- Multi-purpose housing for young people starting out and older people down-sizing is needed.
- Tring requires affordable homes for the local young residents.
- No further sites required as perfectly adequate accommodation exists.
- Older people should be provided with suitable housing stock to downsize to so as to release a significant number of family sized houses, albeit at the more expensive end of the housing market.
- Higher density accommodation such as high-quality apartment complexes could limit the release of greenfield/Green Belt land.
- The Council should understand each community's housing need e.g. canal households.
- Small bungalows needed for older residents so that they can downsize from their large family homes and release housing for younger people.
- More 1-2 bedroom homes should be built for first time buyers.
- Within a development there should be a mix of sizes of units and types, but excluding larger 4+ bedroom houses.
- Dacorum Borough Council and Hertfordshire County Council cannot provide homes for the elderly at a reasonable cost, so you are then held to ransom by businesses who exist to make a profit.
- There is a need for 3, 4 and 5 bedrooms affordable family homes and not just flats.
- The Council should promote community living by not separating out the housing for different age groups. The old should co-exist with the young as this provides a feeling of community.
- The draft Dacorum Local Plan fails to meet the desperate need for more affordable and social housing for our young people, as well as teachers, NHS staff, carers and other workers we need in this community.
- Berkhamsted and Kings Langley need more affordable accommodation for younger people starting out on the housing ladder and maintain the vitality of local communities.
- No housing development should take place on green belt around Kings Langley, including Shendish.
- There are already too many residential and nursing homes for over 60s.
- Gypsy and traveller site provision should be based on more up-to-date demand forecasts.
- Any provision for transient housing should be open to anyone wanting to choose that lifestyle – high standards of accommodation appearance and maintenance need to be assured.

- Green Belt land should only be allocated for development where guaranteed more than 50% genuinely affordable housing (and at least half of that to be social housing), increased provision of sheltered and extra care housing for older residents, and increased provision of 1 and 2 bedroom flats for younger residents.

Question Number 19

Question Text: Do you agree with the proposed approach to the timing of site delivery?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- **Little Gaddesden Parish Council** agree with the proposed approach but made no further comment
- **St Albans Diocesan Board of Finance** supports the phased approach to housing delivery throughout the Local Plan period and the use of 'Permission in Principle' to facilitate sites coming forward.
- The phasing plan should facilitate the early release of both Green Belt and Brownfield sites to account for the substantial rise in housing demand, enabling sufficient infrastructure to be delivered concomitantly.
- The phasing plan and timing of housing development should be focused on Brownfield Sites and respond to economic, political and social changes that may occur within the plan's lifespan.
- The allocation of housing sites should be phased in line with the release of both Green Belt and employment sites.
- Development on Green Belt should be approached in a controlled, structured and proportionate manner on selected Green Belt land with sufficient infrastructure.
- The delivery of sites on the outskirts of towns (e.g. Tr-h4) should be prioritised, as they can be developed early on in the Plan period without the need of immediate additional infrastructure. Whilst, Green Belt land should be considered in relation to the availability of infrastructure and the prospective benefits of the housing development to the local area. The early development of the site at Cow Lane/Station Road in Tring could facilitate improvements to the sustainable transport infrastructure in the area, providing links to adjacent sites like Tr-h5.
- Large areas of land for development should be made available immediately in order to set a precedent for the greater provision of services and a step change in Dacorum's approach to housing and infrastructure delivery; for example, improved hospital services.

Question Number 19

Question Text: Do you agree with the proposed approach to the timing of site delivery?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- **Berkhamsted Residents Action Group (BRAG) and Berkhamsted Citizens' Association** disagree (in response to 6.4.2) that housing development in towns and villages, such as Berkhamsted, can be un-phased as cumulatively, the development of small to medium housing sites puts local infrastructure under an inordinate amount of pressure. BRAG strongly dispute 6.4.4 as Green Belt sites remain highly attractive to developers over and above Brownfield sites, DBC should adhere to the Government's guidance and the 'good reasons' in Dacorum's Core Strategy should not be forgotten or overlooked.
- **Premier Property Acquisition** state that the Issues & Options document does not clearly define what development is proposed. Moreover, they dispute the phasing of Green Belt sites as this artificially restricts the delivery of Green Belt land for development and the accompanying infrastructure.
- **Taylor Wimpy Strategic Land** view that the phasing plan is not clear: despite the Plan illustrating a good supply of Green Belt sites, the Brownfield sites are prioritised for delivery, such sites are liable to viability issues and should not be relied upon to deliver housing. The early release of Green Belt land could enable the crucial delivery of infrastructure to allow Brownfield Sites to come forward. Moreover, as agreed during Examination, the removal of the prospective phasing on three sites may facilitate the delivery of additional sites for development, ensuring that the housing demand is met.
- **Hightown Housing Association** disagrees with the staggered or phased release of land for housing delivery, especially deliverable Green Belt sites such as Grange Farm in Bovingdon, as natural delays in the process (e.g. ownership) will stagger development.
- **Home Builders Federation** state that DBC should not be dependent on unrealistic delivery expectations on sites released early on in the phasing plan. Additionally, sites should not be safeguarded for future development, but put forward for this plan period.
- **Grand Union Investments** do not support the phasing of development as it is an obstruction to the delivery of housing. Additionally, they view that it is a priority to get the new Local Plan put in place due to the considerable housing shortfall of 15% over the last plan period when comparing to the figures outlined in the Core Strategy.
- **DB Land and Planning (DBLP)** is concerned that the housing delivery plan is unclear, specifically regarding whether or not DBC are proposing a phasing

policy. Moreover, DBLP do not support the delivery of Brownfield sites before Greenfield sites, as this sequential approach hinders housing development.

- **Harrow Estates Plc** proposes the expansion of Tring into the Green Belt as the only viable option to meet the housing need in the Town, due to highly constrained nature of its urban structure.
- **W Lamb Ltd** does not support the phased release of Green Belt sites in order to prioritise Brownfield sites, when considering that a notable proportion of Brownfield sites available for development have remained undeveloped due to delivery constraints such as ownership. Moreover, larger housing sites are strongly favoured as they have the capacity to deliver a considerable number of homes over a long period, without constraining development like smaller sites.
- The views of the Chilterns Conservation Board and the Commission for the Protection of Rural England (CPRE) should be taken into account
- Calling for sites to be put forward for development promotes a reactive rather than a proactive approach to housing delivery in the Borough.
- Brownfield Sites should be more explicitly defined – numerous employment centres/businesses in Tring have been converted into housing due to the higher profit of such development, compromising employment opportunities and economic growth in the local area.
- Only Brownfield Sites should be put forward for development, Green Belt land is sacrosanct and should never be developed on it has a fundamental purpose as a physical buffer to urban sprawl and conurbation.
- People choose to live in the Borough because of the Green spaces around them, thus Green Belt land should not be developed on.
- Local market towns such as Tring are almost set to double in size due to the increase in housing numbers, this will be a detriment to the character and heritage of the towns in the Borough.
- The timed phasing plan for development sites should primarily focus on Brownfield Sites. All available Brownfield Sites should be identified in the primary Plan.
- Green Belt land should be released last – the Be-h3 site, a large Green Belt site, is scheduled to deliver 50 homes/year from 2020/21 i.e. the beginning of the plan cycle, contravening the Government's prioritisation of Brownfield Sites for housing development.
- The release of Green Belt sites for housing development will set a precedent for the continuous and accelerated release of Green Belt sites without the necessary supporting infrastructure
- The Government continued to support the protection of the Green Belt in the Autumn 2017 budget, so the Green Belt should be protected in line with national policy.
- The plan is heavily dependent on the release of large Green Belt sites for the delivery of housing, such a focus on Green Belt sites can result in issues like Compulsory Purchase Orders being overlooked.
- The open-ended nature of the development sites put forward for development in Dacorum generates fear amongst residents regarding house prices in areas in the locality of prospective sites.

- Concern raised regarding the ‘evidence’ denoting the increased need for housing development and stressed there is insufficient justification for the growth rates in Dacorum.
- There should be more pressure on developers to deliver housing – developers should complete development within three years of planning permission being granted or face a fine of up to 25% of the value of development.
- Green Belt land is lucrative for landowners and developers:
 - Developing on Green Belt land is the easiest and cheapest solution, often enabling developers and landowners a large profit. Brownfield sites should be made more profitable for developers to detract from building on Green Belt land.
 - Utilising large areas of Green Belt land for housing development is unnecessary and only beneficial for developers
- The provision of housing on Green Belt land by developers for commercial profit should not be described as ‘exceptional circumstances’, especially when empty properties are available in urban areas. The ‘exceptional circumstances’ that would merit the release of Green Belt sites for development needs to be tested.
- The infrastructure (traffic, parking, doctor’s surgeries, schools and drainage) in Towns and Villages is insufficient to support the prospective development in the Borough. Infrastructure should be delivered prior to housing, not after, in order to ensure that new development can be supported. Land should not be released until the necessary infrastructure is in place.
 - Contra to the statement in 6.4.2, the delivery of small to medium sites for housing development will put significant pressure on over-capacitated local infrastructure, with towns seeing an increase in traffic congestion and competition for on-street parking. Thus, a limit should be set on the quota of small and medium developments released in urban areas before additional infrastructure is required.
 - Existing infrastructure in the locality of the prospective development site should be assessed before planning permission is granted – Hemel Hempstead station requires significant investment.
 - The cost and funding of key infrastructure needs to be established in line with the planned delivery of housing sites.
- Developers should be responsible for delivering new infrastructure to support their new housing development and improve the existing infrastructure in the surrounding local area.
- ‘Specialist Accommodation for Older Persons’ needs to be carefully allocated to specific sites in order to ensure the provision of sufficient homes for older people in line with paragraph 6.3.24
- Dacorum has already seen significant areas of Green Belt land released and built upon in order to accommodate the rising demand for housing land.
- The scale of the Green Belt sites being released for development is too excessive.
- Brownfield sites should be released first, followed by small and medium sites.
- Housing developments on Brownfield sites are readily subject to delays due to contamination and land assembly issues – this must be considered when

proposing the phased release of sites. The timing of housing delivery should potentially be reassessed to include deliverable Green Belt sites early on in the Plan period.

- Future housing numbers cannot accurately be predicted and should be reassessed to factor in the possible impact of Brexit on the UK's housing demand.
- It would be environmentally detrimental to build new homes close to existing developed areas
- Sites should not be safeguarded for prospective development (land banking)
- An increase in housing development will encourage more people to the local area who wish to live in commutable distance from London, which will put more pressure on the existing insufficient infrastructure without supporting local economic growth.
- To establish the housing need, property development should be staggered so that the next phase of the Plan cannot commence until all properties in the previous phase have been sold and occupied.
- More prospective development sites should be released in Hemel Hempstead in advance of sites in the smaller towns within Dacorum.

Question Number 20

Question Text: "Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?"

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **BRAG**; agreed with definition.
- **Tring in transition**; agreed with definition.
- **Gallagher Estates**; agreed with definition. Highlights enough homes must be built to meet economic needs of DBC.
- No confidence in DBC's ability to influence economic activity in area.
- Consider connectivity to Bucks (esp. Aylesbury, Chesham)
- St Albans as a city must live up to its responsibility.

Question Number 20

Question Text: “Do you agree with the definition of the Functional Economic Market Area in the South West Hertfordshire Economic Study?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **Berkhamsted Citizens Association & Dacorum Health Action Group**; no mention of proximity to LDN and fast train routes. Commuting patterns from Dacorum to LDN should also be addressed. Topography of the area must be addressed. Infrastructure capacities breached already.
- Need to factor in railway links to London and existing capacity of services.
- FEMA to remain in towns and not villages.
- Large amounts of empty offices to fill trumping the need for new office space.
- Commercial development should support existing local people and not attract outside residents who will subsequently be looking for local housing.
- All councils must agree and co-operate. Non-cooperation of Three rivers and SADC impacts DBC and exasperates employment issues.
- KL Business Park would bring increased congestion to the area. Transport infrastructure cannot cope with this particularly regarding running from issues on M1 and M25.
- “Irrelevant question so haven’t answered”

Question Number 21

Question Text: Do you agree with the proposed approach to meeting future jobs growth?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like, if possible, support your answer with reference to any evidence.

- **DLP Planning** – Dacorum needs to ensure it meets the economic growth planned for the borough to prevent residents out-commuting to other commercial centres and dissipating the community cohesion in the local towns.
 - Yes, however the infrastructure in the Borough needs to be improved to increase the demand for office space, encouraging businesses to relocate to Dacorum.
 - **Grove Fields Residents Association (GFRA)** – agrees with the proposed approach to job growth in relation to office space. Yet, there is a limited capacity for commercial growth in Tring and that any proposed economic growth should be in line with its historic character as a small market town.
 - **Chiltern Countryside Group** supports the economic expansion and employment focus in Hemel Hempstead town centre.

 - Generally agree, but it is beneficial to locate large businesses and warehouses in specific ‘parks’ with improved access, investment and employment opportunities. Premises should be interchangeable in their use, allowing for the flexible conversion between services, office and residential to maintain the economic viability of town centres.
 - New housing sites should be located and developed in line with employment/commercial centres like Maylands Gateway in order to promote employment opportunities in the Borough.
1. Job Targets
 - The proposed approach to job growth is good, however Dacorum would benefit from a stronger emphasis on ‘enviro-tech’ and smart technology. Sustainable energy generation could be a means to increase employment opportunities and green infrastructure.

 - Office Space
 - The current office space available in Dacorum’s town centres is considerably limited.

 - Transport Infrastructure
 - Public transport must be improved and costs reduced to enable young workers to commute to jobs within Dacorum and SW Hertfordshire.
2. Brownfield Sites

- Existing brownfield sites in Dacorum (especially Tring) should be used for a variety of local businesses instead of housing.
- The relative sustainability of existing Brownfield sites usage should be considered, certain locations would promote residential development rather than office use.

Question Number 21

Question Text: Do you agree with the proposed approach to meeting future jobs growth?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like, if possible, support your answer with reference to any evidence.

- **Berkhamsted Citizens Association** assert that the provision of housing for commuters is not taken into due consideration; whilst raising concern about the infringement of employment and investment space in Maylands due to residential development.
- **Campaign to Protect Rural England** views that future job growth needs to be considered in accordance with the availability of employment land in Dacorum. Employment growth is not a viable means to justify developing on Green Belt land; job targets (set in line with NPPF paragraph 14) and national Green Belt policy must be followed.
- **Tring in Transition** disagree with the allocation of site Tr-h5 as industrial/warehouse space due to the fact that it is not listed in the South West Hertfordshire Economic Study conducted in 2016. Additionally, the demand for low cost business space for small to medium sized enterprises and the expansion of established local businesses should be considered.
- **Dacorum Patients Group** state that in order for Dacorum to maintain a sustainable local economy, the Local Plan must provision for a variety of local employment opportunities, including those individuals with the inability to find a job via mainstream employment channels (e.g. individuals with a disability or an impairment). Furthermore, Dacorum should not be dependent on London to provide employment for its population, but instead should consider expanding office space and instil confidence in the local population regarding employment and training facilities and a healthy working environment.
- **Gallagher Estates** propose that Dacorum has planned for an inappropriate level of job growth in line with the borough's economic performance over the last 5 years. Dacorum has consistently accounted for 20% of the total job numbers in the SW Hertfordshire FEMA, but it is only predicted to meet 18% (10,900 jobs) over the forthcoming Local Plan Period; thus thwarting SW Hertfordshire's economic growth aspirations.
- **The Crown Estate** agree that the demand for office space in Dacorum is limited, but view that the Enviro-Tech Enterprise Zone has the potential to increase this demand. Moreover, the employment land owned by The Crown Estate in East Hemel could facilitate job growth in SW Hertfordshire through the provision of industrial and warehouse space.
- **Linden Homes Strategic Land** state that the need for a balance between housing and jobs is crucial when considering the redevelopment of employment land; whilst the local economic impact of converting buildings from office to residential use should be strongly considered.

- **Capital and Regional Plc** suggest that Hemel Hempstead Town Centre has the capacity to provide additional flexible office floorspace alongside St Albans and Watford, who have been designated as the primary office locations in the SW Hertfordshire region.
- **Grand Union Investments** stress the importance of flexible employment land throughout Dacorum in order to accommodate new and existing businesses in the local area (paragraph 21 of the NPPF).
- Job Targets
 - Considering the low unemployment rate in Dacorum (3.6% as of June 2017) and SW Hertfordshire, the prospective job growth (as set out in the Local Plan) is too steep and there is insufficient evidence to merit the provision of additional industrial and warehouse units.
- Permitted Development Rights/Prior Approvals
 - The government policy on 'Permitted Development'/ 'Prior Approvals' has resulted in the considerable loss of office space to residential development. It is an economically profitable pursuit for developers and landowners; however it proceeds to diminish both the employment opportunities and vibrancy of the local towns.
 - The popularity of the government's 'Permitted Development' scheme in Dacorum is evidence for the lack of demand for new office and warehouse space – e.g. the conversion of the Enterprise House offices near Kings Langley Station into flats.
- The Provision of Warehousing Space
 - There should not be any further development of warehouse space due to the low income and quantity of jobs produced (a consequence of the automation of warehouses) and the safety (fire) hazards present with larger warehouses
 - Employment in warehouses should be maintained despite the increased automation of service by robots
- The Provision of Office space
 - More office space should be built in existing employment centres such as Maylands, not in villages like Kings Langley where there is no demand
 - High number of vacant offices across Dacorum e.g. Doolittle Meadow and Panicle House; thus there is no need for the construction of additional offices, especially on the Green Belt
 - New office space should only be built in villages to house small local enterprises that directly facilitate job growth and economic prosperity in Dacorum.
- Transport Infrastructure
 - Job growth in warehouses and office units will incapacitate local infrastructure and increase the demand for housing.
 - The local infrastructure (particularly in Tring, Kings Langley and Berkhamsted) cannot accommodate the rise in population and housing development associated with the prospective job growth in Dacorum.

- The increase in rail and road congestion associated with the proposed office and warehouse developments will render Dacorum more unattractive in the way of future and external investment.
 - The local workforce should be taken into account when considering the proposed economic growth in Dacorum – sustainable transport infrastructure must be improved (e.g. a frequent, cheap and reliable bus service to Maylands and the Enviro-Tech Enterprise Zone to Hemel Hempstead Town Centre and rail station) and businesses should adopt green travel plans in order to improve the sustainability of local transport systems.
 - There should be a greater provision of car parking facilities in the locality of Maylands and other employment centres in order to attract local employees to work in Dacorum, rather than commuting to London.
 - The environmental sustainability of Dacorum should be considered when introducing new warehouses and industrial estates that increase HGV traffic, as this reduces the safety of bike and pedestrian travel.
- Green Belt
 - There is neither a pressing demand nor the exceptional circumstances to permit the release of Green Belt sites (Dursley Farm and site KL-h3 to the east of A41 in Kings Langley and Wayside Farm) for additional employment land; especially considering the proportion of empty office and retail space in Dacorum and the rise in home-working. The construction of new office and warehouse units on the aforementioned sites will result in the increased congestion (A41, M25 Junction 20) and pollution of areas that do not require significant employment and that are a commutable distance from local, varied employment centres in SW Hertfordshire and beyond.
 - Any additional office and warehouse space proposed should be located on existing Brownfield sites, and not Green Belt land
- Flexible working environment
 - The increased flexibility and digitalisation of the workplace enables the development of small businesses and start ups
 - The independent review entitled 'Good Work: the Taylor Review of Modern Working Practices' commissioned by the government should be taken into consideration.
- Commuters
 - The provision of additional housing in Hemel Hempstead will only increase the amount of individuals commuting to London for employment; the possibility of Hemel Hempstead becoming a commuter town will be at the detriment of the local residents and infrastructure.
 - The lack of industrial development planned near Tring is likely to result in the increase in the commuter population in the local area.

- In order to maintain job competition with London, Dacorum should deliver a mixture of high value/high paid jobs, and not additional warehousing employment as outlined in the Issues & Options document.
- Businesses
 - Additional assistance should be given to independent traders and businesses
 - There should be a greater focus on the development of home-based businesses (or the new 'Cottage Industry'), taking into account the increase in technology and wide availability of 4G and 5G broadband.
 - The members of the Ambassadors Group Board should be more carefully chosen to represent the interests of Dacorum's residents
 - There is no demand for additional out of town retail centres

Question Number 22**Question Text: Do you agree with the proposed approach to choosing sites to accommodate job growth?****YES**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Most of the comments are “yes, but...” as land should not be designated from the green belt in anticipation of need, the demand must be proven.
- There should be some consideration in the plan of technology changes, such as warehouse mechanisation and remote working.
- In addition, consideration of the changing work patterns, such as working from home and hot desking.
- In Tring the Akeman street business park is at risk, specialist services should be allowed to stay in Tring.
- If Dunsley farm was to be developed into employment land it needs to be appropriate and small scale, not large industrial warehouses, which are not in keeping with the town’s rural character.
- If Tring grows 25-60%, they will require more commercial units to provide employment opportunities. Warehouses are inappropriate.
- Due to increasing mechanisation, warehouses are not sustainable for economic growth, as they take up the most space and employ less people.
- The need must be proven first.
- The proposal is unpredictable as the southwest Hertfordshire retail and leisure study is not immediately available.
- Such large areas of land should not be retained for employment land when housing demand is as high as it is. There is a much greater need for housing than jobs.
- The plan should include the strategies for encouraging employment in these new areas. Land should also be allocated where employment is required, not where is attractive to developers.
- The green belt is being used as the easy option; we should focus more on exhausting the potential of existing sites in need of regeneration.
- The majority of the comments endorse BRAG - Yes but Land should not be removed from Green Belt in anticipation of need – must be proven before making such a change. Speed of technical change may alter needs and decision should therefore be delayed until need is imminent

Question Number 22**Question Text: Do you agree with the proposed approach to choosing sites to accommodate job growth?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Majority of the comments are specifically opposing the development of wayside farm in kings Langley.
- Not specified what kinds of businesses types will move to the market towns.
- Farms should not have change of use, as they are unique to the area and provide a local and profitable service.
- We have not considered brownfield land before looking at greenbelt sites.
- Dacorum has seemed to ignore that any development at wayside farm is at odds with the majority of residents.
- Why are we turning green belt into offices when there are so many offices being turned into flats?
- Change of use from farms to offices goes against the central government proposals to help farmers.
- Also there was a worry that removing one of 2 working dairy farms in the county will make us less self-sufficient after brexit.
- There is no justification of the exceptional circumstance to propose this green belt site. Where is the demand for more offices?
- Worries that redevelopment will harm the air quality of the surrounding green belt.
- Employment sites proposed will increase traffic in the area.
- The potential of previously developed land hasn't been given enough coverage.
- There are many vacant office spaces which haven't been researched. Building new office space when there are vacant buildings seems like a waste of resources and money.
- There needs to be a focus on improving existing employment areas and regenerating unused spaces.
- No proper mention of PDL – the council is releasing green belt as the easy option.
- There is not adequate demand to justify releasing 18hectares of green belt land. Surely if there are vacant offices and office blocks being converted to flats there is not demand.
- Little consideration to changing work patterns (working from home/hot desking).
- Seems to be a general confusion as to why there are vacant buildings being converted into flats, yet we are suggesting removing green belt land.
- Doesn't meet NPPF guidelines.
- If the kings Langley area was so attractive why are there vacant buildings surrounding the train station. Rent costs too high?
- Need to look strategically into the future, the ways people will work and the dominant services will change greatly between now and 2036. Needs to have provision for flexible employment spaces.

- Existing business areas aren't being utilised properly.
- A large business park in Kings Langley will not be in keeping with the historic character of the village.
- Some explicit consideration should be given to technical technology change, such as driverless vehicles, further warehouse automation and remote working could impact requirements for warehousing and offices for job growth.
- Land shouldn't be removed from the green belt in anticipation of need, there needs to be an existing demand.
- How is Wayside Farm the only site with potential?
- Green Belt land should not be considered until ALL other possibilities have been exhausted. The need for any such consideration should be proven beyond all doubt before making any change.
- Smaller offices could be located within housing areas.
- If employment levels are so high where is the demand for a huge green belt release?
- The Wayside Farm is mainly used by local residents and is therefore more sustainable and environmentally friendly, and many say the area is a part of the local character.
- A worry that if 18ha or larger will be designated, Kings Langley will no longer be its own separate community (sprawl into Watford).
- Adding more vacant buildings to green belt land is not encouraging economic growth.
- The demand for offices is declining.
- New sites are too far from public transport routes, encouraging car use. This is bad for congestion and pollution.
- Employment development appears to be where the developers would like it, not where the community needs it, such as in Berkhamsted where rental yield is high.

Question Number 23

Question Text: “Do you agree with the proposed approach to meeting future retail needs?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **The Crown Estate;** plan to consider the form and size of retail outlets and of new local centres to allow strategic allocations to be made.
- **Berkhamsted citizens;** town centre shopping should be encouraged more.
- Sufficient shops in Dacorum already.
- Shop content low in Hemel despite large retail floor space.
- M&S designated as ‘out of town’ not supported.
- Insufficient parking in Berkhamsted and Tring to support highstreets,
- Support town centre visiting numbers by building on top of shops in town centre which will mitigate new growth congestion and parking issues in centres.
- Additional food outlets should be limited.
- Encourage businesses reflective of village and small town centre character and demand,
- Jarman fields and Apsley Mill retail developments granted, compromising the newly regenerated HHTC.
- Concerns over antisocial behaviour and the impact on local centre attractiveness/viability.

Question Number 23

Question Text: “Do you agree with the proposed approach to meeting future retail needs?”

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

Other Not supporting

- **Bidwells;** ** refers to open land designation at Edgeworth House. Private land owners prefer this to be allocated for development. They have previously objected the designation. They would like it removed from the single local plan and re allocated at a potential site for development.
- **Tring in transition;** more localised shopping centres. Encouragement on smaller, local retail businesses rather than large chains who ‘push’ other smaller, local retail units out. Increased technology and delivery services reduces the need for large food superstores.
- **The Little Cloth Rabbit;** Increase investment on Berkhamsted and Tring Town Centres rather than focussing majority of policies on HH.
- Enough retail outlets.
- Enough focus on retail outlets. More for boutique shopping experiences and a focus on restaurants, pubs and bars particularly in HHTC.
- Online shopping more popular therefore no need to expand or introduce new retail outlets.
- No mention for dealing with empty shop units especially in HHTC.
- No capacity for Tring TC to grow. Option to reduce estate agents however as they take up the largest amount of space and are unnecessary.
- Support local shops rather than large chain brands. Business owner responded to this with his concerns over the loss of ‘identity’ if franchises are encouraged over local shops. Used Dunstable as a ‘ghost town’ case study.
- Tring town centre should be the focus of regeneration money moving forward immediately.
- South HH and KL residents often prefer to shop in Watford rather than HHTC or other local areas. More needs to be done to attract them back into Dacorum.
- There is scope for improving the quality and permanence of retail floor space while meeting anticipated growth in retail spend, and to diversify the retail offer to increase “dwell -time” and hence retail The new cinema and A3 units in the Marlowes are part of this strategy.
- Potential to fully pedestrianize all town centres if infrastructure is implemented correctly. Redirecting routes must be completed with respect to local neighbourhoods.

Question Number 24

Question Text: Do you agree the proposed approach to encouraging tourism?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- **Little Gaddesden Parish** – SUPPORT – No Comment
- **Berkhamsted Citizens** – SUPPORT - more infrastructure is needed and a balance needs to be struck between the benefits and the impacts of tourism in heritage and natural areas. In addition, building along the grand union canal and other green belt development is contrary to the promotion of tourism as we are paving over what makes the area unique.
- **GFRA** – SUPPORT - Tourism should be encouraged to take advantage of the rural attractions associated with the AONB and Green Belt, as the natural attractions of the borough should be the highest priority. Improvement should concentrate on locations where infrastructure can allow growth.
- **BRAG** – SUPPORT – supports the importance of tourism but the borough needs more infrastructure to support tourism. A fine balance needs to be struck as too much could seriously harm both urban and rural environments e.g. Chilterns AONB
- Many said that tourism needs to be encouraged as we live in a naturally beautiful area.
- Tourism has a lot of untapped potential in the area.
- There should be a greater focus on the history of the borough. The area has rich Ancient, medieval and contemporary history.
- Agree with the approach but proposed development (Be-H4) will affect local honeypot sites (Ashridge).
- The local economy requires income from tourism, and the strategy should have a focus on local initiatives.
- Having a concrete clear strategy for tourism will be beneficial, as previous approaches by dacorum have been inconsistent.
- Potential for nature walks.
- Many comments focused on the development of a museum, using the Dacorum Heritage Trust.
- The current transport infrastructure, nor public transport provision could cope with tourism.
- There could be a larger focus on how many links there are to other tourist areas.
- To encourage tourism is even more reason to not over-develop villages and the green belt.
- No mention of the grand union canal, or berkhamsted castle.
- Tring has lost most of its tourist facilities, such as the Huckvale hotel (now retirement flats).
- Support the john Washington memorial to better promote the history of tring.

- Dacorum needs to promote the whole borough, including the rural villages, which have their own character and uniqueness.
- We must support a tourism strategy as best we can due to the benefits on the local economy.
- It was pointed out that people are put off Hemel Hempstead. Hemel needs modernising and promoting. At the moment, every one presumes it is an ugly concrete new town. Wasted potential here.
- Tourists will not visit villages if they lose their historic character/natural environment and become urban sprawls.

Question Number 24**Question Text: Do you agree the proposed approach to encouraging tourism?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

The most common objection to the plan is the conflict between the development proposals and the tourism strategy. Building on green belt will mean the thing people come to visit will be lost. The borough has a rural appeal and is the first rural area outside greater London. If the green belt is developed on the borough will lose its character and appeal for visitors.

- Not practical enough “empty sequence of meaningless concepts”.
- Not set out an approach, just stated that there would be one.
- Many people said that tourism needs a larger focus as tourism is key to local quality of life and provides growth.
- The mass development proposed will ruin the unique character of market towns and villages.
- Concrete and housing estates are not attractive.
- Parking problems (especially in Berkhamsted and by Berkhamsted Castle)
- Honey-pot sites like Ashridge Woods struggle to cope with the numbers, therefore a strategy needs to be laid out on how Dacorum will cope with increasing visitor numbers.
- A worry that the existing infrastructure can't cope with more people.
- Confused tourism with commercial enterprise and leisure activities.
- The strategy needs to be more clear and objective. Words with no substance.
- Recognition that tourism is not the number 1 priority (housing need comes first) but it is important that visitors are still able to enjoy the natural environment.
- Tourism in KL has not been actively promoted. Suggestion for a historic site brown sign on major local roads.
- More tourism and development will cause more congestion, which will discourage people from visiting.
- Increased traffic will mean cycling and walking will become dangerous, and there will be a pollution problem.
- Wayside farm and Shendish bring visitors but there are proposals to develop there. A local resident met people from Enfield, Slough and Oxford to visit wayside farm.
- Villages are being absorbed by Hemel, meaning they are losing character and uniqueness.
- People can only travel to most of the tourist sites by car. Transport is inadequately funded (Shuttle bus?).
- Hemel Hempstead needs a vibrant arts centre to celebrate its heritage. Concert venue/museum etc.
- People have never heard of the Herts tourism strategy and believe it is a waste of money.

- There were comments suggesting that Hertfordshire isn't a major tourist site, could possibly conduct a survey or write an explanation that the borough has more domestic visitors.
- There should be more promotion for local residents to visit local sites.
- Concern that the area is full already, let alone with the proposed development and more tourists.
- Tourism leads to crowding and urban problems, there needs to be a reference to how this harm will be mitigated.

Question Number 25**Question Text: Do you support the proposed approach to the natural environment?****NO**

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

Statutory Consultee Objecting

- Chiltern Countryside Group- Impact of development on AONB in Berkhamsted and Tring, views increased levels of pollutions and impact on biodiversity. Release of Green Belt will have an impact on AONB. Impact of development on views, transport with pollution (light, noise and fumes) and views.

Other Objecting

- Water resources availability lower water table, impact on green infrastructure (chalk streams)
- Historic landscape
- Quality of life
- Unable to see how sustainability offsetting would be successful- established habitats should be protected offsetting does not replace these.
- CAVAT assessment to be made on proposed sites and protection orders
- Flooding
- Pollution- development on the outskirts of areas (Berkhamsted) will make this worse and encourage car use more
- Infrastructure- road capacity, doctors (from pollution), water and sewage
- Soil displacement
- Loss of character in village locations- green infrastructure needs to work with historic and cultural
- Conservation of landscapes does not work with large populations and poor transport
- Be-h3 negative impact on bridleway become heavily used, no provision to mitigate
- Canal and riverside protection and increasing accessibility for people- Rectory Farm site (KL-h2)
- Areas missing from consultation and Sustainability Framework- use of renewables, protecting natural resources and reduce waste
- Need to provide specific areas that are for wildlife, sports facilities etc do not provide the correct environment
- Alignment with the tourism strategy to protect the environment
- HH1b wildlife
- Section 40 of the Natural Environment and Rural Communities Act 2006
- Support for option 1B

- Request for studies on the effects of traffic on Piccotts End after development has taken place
- Environment to be considered first
- Request for an ecological corridors map to be produced and included in the plan
- Commercially attractive environment, efficient and affordable transport, health and well-being
- Greater public space/ green infrastructure within Berkhamsted to accommodate housing growth
- Grove Road Residents Association- Not fully considering the impact on green space greater concern for affordable housing- impacts on mental wellbeing
- Tr-H5 Dunsley Farm is the preferred site for development of housing playing fields and employment site.
- Tring cannot take population increase correct infrastructure not, school at capacity, transport provision is inadequate and in undesirable locations for the towns' needs, proper consultation has not been taken of green belt release.
- Grove fields (Tr-H3 Land at Icknield Way/Grove Road) unsuitable for residential development housing numbers are too high.
- Impact of development on AONB in Berkhamsted and Tring, views increased levels of pollutions and impact on biodiversity. Release of Green Belt will have an impact on AONB. Impact of development on views, transport with pollution (light, noise and fumes) and views

Question Number 25

Question Text: Do you support the proposed approach to the natural environment?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Chiltern Society- Continued approach towards protection of AONB and that landscape character as the basis of decision making. Significant threat from proposed levels of development.
 - Greenbelt protection
 - How this will be implemented
 - Prioritise biodiversity and pollution reduction
 - Increase the risk of flooding
 - Impacts on the views etc from the natural environment needs to be considered
 - Assess how policies could limit the effectiveness to be able to build in the area.
- Sites promoted
- Care home -Site at Spring Garden Lane, within AONB and Wigginton and Ashlyns Plateau Landscape Character Area- Landscape Character Assessment 2004
 - Land South of Aylesbury Road, Tring

Question Number 26

Question Text: do you agree with the proposed approach to the historic environment?

NO

If no, please explain what alternative approach to our proposed approach you would like to see and support your answer with reference to any evidence.

Chilterns Countryside Group: the conservation of the historic environment e.g. views to and from Ivinghoe Beacon, the Grand Union Canal, Tring Park, Ashridge, Pendley Manor and specific archaeological sites in Berkhamsted, will all be challenged, by the Local Plan.

Berkhamsted Citizens: No Historic environment should encompass historic towns such as Berkhamsted – identifying limited Conservation Areas whilst destroying the surrounding environment will have detrimental effects on the town as a whole. Policies should be included to guide Quality of Neighbourhood Design. It will be necessary to ensure adequate resources to conserving the historic environment. The canal is an important historic asset with priceless and irreplaceable industrial archaeological value and needs to have more protection.

Kings Langley & District Residents Association - However, it is important to have a robust approach protecting the historic environment. It is positive to see that the approach focuses on protection of the historic assets. However, it is unclear how the approach will protect historic landscape setting given the number of sites identified for potential development. Kings Langley is a village with a rich historic character, yet this will not be protected as currently outlined within the I&O paper. It is not clear how the potential development sites identified will protect or mitigate the resulting impact on the historic village of Kings Langley.

- **Kings Langley** is a historic village and the royal heritage should be protected.
- The Upper figure options for development directly contrast to Dacorum's historic environment proposed strategy.
 - Site code K2-h2 (wayside farm) is a site of national historic importance (royal hunting lodge – adjacent to the Old Plantagenet palace site). Many stated that this is what gave Kings Langley its name.
 - Many people also mentioned the Old Covenants on the Wayside farmland, and that need to be protected.
 - Building on Wayside Farm would decrease people's enjoyment of the historic site, as it is a traffic free area of recreation.
 - Worry that Kings Langley will lose its unique heritage if it is expanded closer to Hemel Hempstead and/or Watford. Policies should protect sites such as Wayside Farm, Shendish/hill Farm and Rectory Farm, as they act as a buffer zone.

- Development on the farmland will cause indirect environmental damage to the historical site, via air and noise pollution, caused by increased population, congestion and construction.
 - Too much development in Kings Langley will lead to decline, as it will become an unattractive place to live or visit.
 - Kings Langley Priory entrance should have specific protection.
 - It is not made clear how the harm from the proposed development in Kings Langley will be mitigated.
 - The character of Kings Langley will be undermined by large commercial development.
 - Overall feeling in the comments that DBC has ignored the value of the historic environment of Kings Langley.
 - Also a few comments suggested that villages like Kings Langley should be considered part of the historic environment.
- The historic environment at **Shendish** deserves protection from development
 - Located within a site of archaeological interest, with two listed buildings. It is also a locally registered park/garden.
 - Development could lead to permanent loss of archaeologically significant land.
 - Many comments focused on how the Shendish site is used as a quiet, rural, traffic free area where people come to visit. If the land is developed on people will not be attracted to the area.
 - The development of the manor estate means the setting of the heritage asset is already being compromised.
 - Again, like with wayside farm, increased population and congestion will negatively affect the heritage asset.
 - DBC hasn't valued the important local historic status of the Shendish site.
 - Open spaces are as much a part of the borough's heritage as the buildings.
 - It is wrong to say that the council is protecting the historic environment if development in the surrounding area causes harm.
 - The impact of congestion, parking, and pollution reduces the attractiveness of historic towns and villages.
 - Promoting tring station needs to be done carefully due to the possible impact on Pendley Manor, and the community in Aldbury.
 - Archaeology studies seem to take place as emergency procedures, or as an afterthought once development has begun, and land is lost without being surveyed. (Relating to Historic England) need to have closer communication with County.
 - The balance between protecting the historic environment and developer interests is perceived as very in favour of developers.
 - Piccotts end with listed buildings, in a conservation area, needs to be protected from spill over from new high-density housing developments. It also needs to have a buffer zone, and access to Piccotts end should be separate from any development.
 - It is unclear how the approach will protect the historic environment given the number of potential sites.
 - Tring is a small town and the high street can hardly cope with the growth occurring at present.

- Protecting the historic environment should surely mean keeping villages as villages.
- How will the mass scale development affect historic parks and gardens?
As the major settlement Hemel Hempstead will benefit from new development and growth, as this will attract people to the area, however in historic market towns and villages, excess development will make them less appealing places to live/visit.

Question Number 26

Question Text: do you agree with the proposed approach to the historic environment?

YES

If no, please explain what alternative approach to our proposed approach you would like to see and answer with reference to any evidence.

- Support for the use of the word 'irreplaceable' this should be continued into the plan.
- Support for the positive strategy set out to maximise people's enjoyment of historic sites.
- A few supporting comments pointed out that it is good that DBC are following the advice of planning policy guidance.
- The report by the Chilterns conservation board should be taken into account.

The Chiltern Society: support the approach proposed. It is essential that these constraints are fully considered when identifying sites to meet the proposed housing need.

Grand Union Investments: it will be necessary to carry through core strategy historic environment policies with regard to National guidance and policy, which sets out a positive strategy for conservation and enjoyment of the historic environment.

Grove Fields Residents Association: support the approach taken by the Council to the historic environment and encourages the preservation of and enhancement of Conservation Areas however without over prescribing restrictions that reasonably withhold the ability for brownfields sites within settlements to efficiently deliver a reasonable standard of housing supply that can contribute to the wider housing plan.

The Chiltern society: support the proposal as long as constraints on the AONB and green belt are fully considered when proposing sites to meet the need.

Question Number 27

Question Text: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?

YES

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Contrast in policy goes against the environmental plan
- Large scale proposals will not meet these aims, development in HH-h1a, HH-h1b, and HH-h2 would not support these
- Proposed development in Kings Langley would increase traffic, concerns that traffic levels are already exceeding Air Quality standards. Rectory Farm KI-h2 on flood plain.
- Lighting in Tring to provide safe sustainable access to the station and town
- Development focused on Hemel which has more infrastructure- Berkhamsted
- Cycling not a viable option in Berkhamsted

Question Number 27

Question Text: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?

NO

If no, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Hertfordshire County Council- monitoring of air quality and include this as part of the planning process to identify any air quality impacts from new development through policy. 8.3.1 protection of natural resources these should be defined what these are as they cannot be protected otherwise. Protection of chalk streams over abstraction is resulting in degraded groundwater and SSSIs development cannot be considered sustainable until solutions to these issues can be found
- Green Belt release- threat to environment AONB, ancient woodland, farm land
- Loss of access to countryside at Shendish and Wayside Farm (HH-h3 and KL-h3)
- Negative impact on wildlife- KL-h2 and KL-h3
- Pressure on existing infrastructure- drainage, sewage
- Development in Tring would have a negative impact on canal environment and Chilterns AONB
- Negative impact of development on conservation areas
- Out of date data used
- Road safety
- Support for option 1A

Question Number 28

Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies

YES

If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.

- Issues of enforcement
- Better traffic management

Question Number 28

Question Text: Do you think we have addressed the key issues relating to how we can help reduce the impacts of climate change through our planning policies

NO

If no, please explain what other options we should consider and where possible, support your answer with reference to any evidence.

- Vehicle pollution is not considered
- Policy that encourage active travel- public transport, cycle lanes
- Water extraction and the impact on chalk streams
- Congestion to worsen and little provision for active travel – Kings Langley
- Discussion with community energy groups
- Risk of flooding- HH-h1b flood plain
- Infrastructure
- Oppose Luton airport expansion- increase in flights will increase pollution in the Borough and have an impact on noise pollution
- Need for affordable housing, infrastructure pressure, pollution and ensuring high standard buildings- Berkhamsted, Northchurch and Tring
- Greenbelt release for affordable homes, increased provision of shelter for elderly, 1 and 2 bed properties for changing needs, limiting traffic growth and enhancing road safety
- Low carbon and climate change action plan to be produced in accordance with How Local Authorities can reduce emissions and manage climate risk- Committee on Climate Change May 2012
- Tring in Transition- Review on climate change policies- in relation to the committee
- Central Government putting emphasis on more affordable housing and energy efficiency- Tring
- Support for option 1b
- Chilterns Conservation Board report- Cumulative impact of development on the Chilterns AONB- support for their comments

Question Number 29

Question Text: Do you agree that we have covered all relevant issues relating to physical infrastructure?

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence

- Improved rail network provision particularly for the smaller stations that are not frequently stopped at.
- Improvements to traffic flows/ road capacity (Kings Langley sites not suitable)
- Housing numbers are needed before this can be determined
- Improved public transport for more rural areas- later and more frequent services
- Water availability- further abstraction will make this worse
- Kings Langley unable to support significant development- due to infrastructure issues- scheme to relocate traffic flows from the village
- Agreement in the principles, believe that development should only start once physical infrastructure improvements have been made.
- Traffic modelling cannot provide accurate data

Question Number 29

Question Text: Do you agree that we have covered all relevant issues relating to physical infrastructure?

NO

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence

- **Pitstone Parish Council**- Development in the area would increase demand on Tring station, infrastructure at the station is not adequate currently, nor is the transport/active travel infrastructure to get there. Consultation with Bucks County Council for infrastructure to meet needs.
- **KL&RDA** - Transport links in south Dacorum overloaded at peak times, investment in water and sewerage infrastructure. Improvements to telecommunications and power networks
- Rail capacity, cost and associated infrastructure (Apsley, Kings Langley, Tring)- expect this to worsen with HS2 construction, also issues of surrounding development in neighbouring authorities and how this will impact on Tring station.
- Traffic, road capacity (congestion), and parking availability- further arguments that traffic modelling does not accurately measure traffic flows (Apsley, Kings Langley, Bovingdon,)
- Use of Bovingdon airfield to create a bypass road
- Berkhamsted current traffic calming measures are not working effectively and increasing pollution levels on the high street
- Hospital provision and accessibility to Watford
- Public transport needs greater focus/ provision- how the Borough will work with providers
- Impact on settlement/ historic character (Kings Langley, Bovingdon)
- Impact on community assets (KL-h3- Wayside Farm)
- Green Belt release- land used by residents for variety of different activities
- Limited infrastructure to promote active travel- unsafe, geography of the areas in Dacorum make encouraging this difficult
- Utilities availability (water, sewage, gas, electricity, refuse collection, telecommunications)
- Complaints of sewerage issues in the recent developments in Berkhamsted.- Will need an upgrade of the treatment facility
- Education facilities pressure on places
- Healthcare provision and accessibility (long wait times) - consultation with key stakeholders to ensure this issue is resolved and does not have a negative impact elsewhere.
- Broadband speeds below requirement
- Provision of leisure facilities
- Increased levels of pollution (light and noise too)
- Impacts on health and wellbeing

- Proposed developments in Kings Langley could not be supported by existing infrastructure, and upgrading these would be challenging
- Land near M25 to redirect traffic away from Kings Langley High Street
- Limited availability to improve capacity in smaller settlements (Berkhamsted, Tring)
- Transport links are limited in Berkhamsted other than along the town centre
- Concern about where funding will come from to support infrastructure improvements
- Flooding
- No job availability to support housing growth
- Increased CIL rates to provide infrastructure
- Protection of Chalk streams already issues of water availability
- Impact on existing communities
- Increase in housing for elderly will put additional strain on health services
- Support for proposal 1a and 1b
- Development unsuitable on Ivy House Lane (Be-H3) traffic issues
- Impact on wildlife habitats
- Impact on AONB
- Updated Infrastructure Delivery Plan
- Provision of recreational areas such as fields and more community activities beyond community buildings
- Encourage local renewable energies and development that minimises environmental impact/ uses less resources
- Waste and recycling centres are busy
- Encouragement of large scale developments where this sufficient space
- Electric vehicle provisions
- More affordable housing – 50% should be a requirement to build on Green Belt land
- Garden village approach on Hemel Hempstead to support the regeneration of the town centre- reference to AVDC approach. Strategy to achieve regeneration is missing and little reference to local services in other towns
- Transport plans for the smaller settlements in Dacorum
- Building of relief road from Bourne End junction across to B4505- better access development along this that would minimise impact on existing settlements
- Infrastructure provision should be based on the locally assessed needs rather than the size of the proposed development.
- Legal agreement between developers and utility providers to provide funding for infrastructure upgrades, this should form part of the evidence base in understanding how deficiencies in site allocations can be addressed which would provide better understanding for the public.
- Sites to only be considered once funding for infrastructure has been planned
- Recognition of Luton Airport as an area to help economic growth and as a strategic physical infrastructure site, creation of a more integrated transport system.
- Accessibility issues for disabled people etc- transport

Question Number 30

Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

- Canal and River trust- use of green space waterways for health
- Overlooking academy schools?
- Document attached with Patrick Barr, response on the development of Tr-H5 site, mentions the need for additional provision of hockey sites within Tring
- Utility service provider's argument that the infrastructure proposal is not integrated into the plan
- Don't agree that Herts CC assessment of 1350 homes only needing limited infrastructure improvements.
- The WHHT are producing figures with lower population growth rates than intended in the plan, talks about having discussions with St Albans Council etc. how it affects Hemel Hempstead healthcare.

Question Number 30

Question Text: Do you think that we have covered all relevant issues relating to social infrastructure?

YES

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

- Better communication from the Council across the Borough through different outlets.

Question Number 31

Question Text: Do you think that we have covered all issues relating to green infrastructure?

YES

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

- Canal and River Trust- important for wildlife and mitigating habitat loss
- No development on Green Belt land
- Contradiction on Green Infrastructure loss of open space from development
- This should be considered regarding the Be-h4 site
- Does not comply with building on Green Belt Land
- Green infrastructure has been considered but other infrastructure needs have not
- Do not believe that these spaces will be provided

Question Number 31**Question Text: Do you think that we have covered all issues relating to green infrastructure?****NO**

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

- Chiltern Society- More information on the approach to strategic green infrastructure, Borough wide analysis to see how areas link together to ensure new development can link and access this green infrastructure.
- Chiltern Countryside Group- Does not believe infrastructure improvements should be subject to Green Belt release, not convinced that the scale of development proposed would meet the needs of future and existing residents. Do not agree with the proposal suitable alternative natural greenspaces is not appropriate if such space already exists, protection of farming land, wildlife corridors and habitats. Berkhamsted and Tring have well used green space with rights of way. It is important for health and well being and that these spaces are accessible. Suitable alternative natural spaces within the urban environment should be encouraged, more beneficial in Hemel Hempstead, impact on AONB should be minimised.
- Green Belt/ agricultural land release goes against Core Strategy (Kings Langley, Berkhamsted, Piccotts End, Tring)
- Support for option 1a and 1b
- Infrastructure is not available in Bovingdon
- Developer contributions for new infrastructure
- Infrastructure availability could not cope with expansion (utilities, education, healthcare)
- Chalk streams- concern of pollution, drying up- wildlife impact endangered species in the area
- Traffic impacts of development in the areas
- Flood risk
- Land between Gadebridge Lane and Galley Hill- development here would have detrimental impact
- Consultation with Hertfordshire County Council to provide infrastructure
- Green belt removal would impact on leisure availability in the settlements
- Development and the guidance of infrastructure provision is useful but should be assessed on a case by case basis so that where there are areas of greater deficiency these are not worsened
- Green belt release should not be used to provide infrastructure improvements, developer contributions on the scale proposed is self-defeating
- Development to provide infant play space and sports areas appropriate to the scale and included in all schemes

- Chilterns Conservation Board report on the Cumulative Impact of Development on the Chilterns AONB.
- Better permeability of green infrastructure from Hemel Hempstead town centre to encourage active travel
- Up to date evidence, update CIL charges New mill, Tring has potential to provide new infrastructure
- Affordable housing, infrastructure- green belt allocation include 50%+ affordable homes, assessment on the impact to infrastructure from development, mitigate climate change.

Question Number 32

- **Question Text: Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?**

YES

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

- Works to towpaths to accommodate extra traffic and reservoir upgrades required by development close to reservoirs need the funding for such opportunities and the mitigation of impacts to be addressed by planning policies and infrastructure delivery plans via use of s106 Agreements or CIL (C&RT)
- Welcomed that the document recognises the infrastructure-delivery advantages of the allocation of relatively large development sites and the need to ensure infrastructure contributions are not set at a level that threatens the delivery of development. (Gallagher Estates / Pegasus)
- Explore options for seeking central Government support for the delivery of infrastructure, and development more generally. For example, the Government has committed a further £2.7 billion to its Housing Infrastructure Fund (Gallagher Estates / Pegasus)
- Use of CIL and Section 106 Agreements are considered to be the appropriate approach for infrastructure delivery associated with new development (GFRA)
- Yes but Council Tax should not be used for improving infrastructure. Developers should pay for it.
- Development impacts whole area, developers should pay for improvement of infrastructure for the area, not just “their” site.
- CIL good but needs to apply ALL new development including single house development
- “Chicken and egg” - Developers need to make profits to improve local infrastructure so no affordable homes are built. Remove profits to build affordable homes and no money is available to fund new infrastructure or improvements to it

Question Number 32

- **Question Text: Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?**

NO

If no, please explain what changes you would like to see and why. Where possible, support your answer with reference to any evidence.

- List of studies (p.84) as to how infrastructure will be funded seems old, needs to be updated to be accurate. (AVDC)
- Use of Crowd Funding for infrastructure improvement or relying on residents to manage local assets and amenities is not sound (Berkhamsted TC / BRAG / Berkhamsted Citizens / DBLP)
- Identification does not bring solution – Strain on resources (water) suggests the South East is not the place to build (Markyate PC)
- All growth delivered through the local plan should be accompanied by an appropriate level of infrastructure, be it education, healthcare provision or new roads. (CBC)
- Growth delivered within Dacorum should not detrimentally impact upon Central Bedfordshire or its residents. Continued cross-boundary cooperation required. (CBC)
- Throughout IO Consultation Hemel Hempstead seems to have priority for infrastructure provision despite Berkhamsted having highest rate of CIL and a relatively higher build rate (Berkhamsted TC / BRAG / Berkhamsted Citizens)
- Liaise with community clubs and organisations such as Tring Sports Forum to maximize the potential for funding sporting infrastructure to identify specialist funding that may be available.(Tring Hockey club / TSF)
- Developer contributions should be ring fenced for the site or town/village where development takes place (Tring in Transition)
- Have to find the balance between allowing for sufficient and suitable investment in existing infrastructure to support any growth whilst at the same time not being overly onerous so as to discourage the full efficient use of brownfield land which has to carry the highest priority for residential development within the Borough. (GFRA)
- Councils should think about how to improve car situation, improvement to resident parking, road congestion etc
- Need for large businesses to contribute to leisure and transport infrastructure has been overlooked.
- Developers should place money in a trust fund for maintenance of Green Infrastructure
- Payment of a levy by developers will not create space for extra parking where there is no space available
- Cumulative effect of development of multiple small sites is not properly addressed.

- Need new and / or better schools, healthcare, roads, parking & public transport. Present contributions by developers to these are very inadequate
- DBC has already failed to provide adequate infrastructure improvements for many years
- Current infrastructure is already overloaded
- Only people to profit will be landowners and developers
- Build in areas that are brownfield and have the capacity
- No confidence in timeliness and quality of developer (lead) infrastructure
- CIL alone will not fund adequate infrastructure. Development should only happen if fully funded by the developer
- Inadequate assessment of capacity, infrastructure constraints and thus the consequences and ability to deliver any of the three growth options considered. There are no practical solutions leading to the conclusion that Tring and Berkhamsted are already at physical capacity.
- Lobby for reintroduction of Land Development Tax with proceeds kept by local authorities to fund infrastructure
- Provision of extra GP's should be taken into account, doubt demographics have been taken into account
- Kings Langley already short of amenity land and loss of green belt would exacerbate this.
- Private funding initiatives are rarely fulfilled
- Developers evade responsibility and local authorities do not have the funds.
- Need clear expectations of contributions from developers with commitments held by bank guarantee to avoid developers failing to meet their commitments
- Use a windfall tax on increased land value on change from Green belt to residential to benefit of local community
- Use of CIL, planning conditions and legal agreements do not appear to have been fully explored, including the Duty to Cooperate with neighbouring Councils. Only Gorhambury gets a mention, which affects east Hemel.
- Council should be looking to encourage "high quality, high density" house building in town and city centres and around transport hubs, along with policy changes to support the conversion of empty space above high street shops and retail and employment land into housing.
- Nothing to support need for improved health care and public transport
- Suspect figures for provision of schools and playing fields is woefully underestimated
- Why would we contribute to a development we don't want?
- CIL is only £250 per new dwelling which only covers 1/3 of cost of provision of infrastructure

Question Number 33

Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?

YES

If no, please explain your reasons, with reference to evidence where available.

- Option 1 and 2 are the best
- Should still be provision of employment land and this should not be taken away.
- Needs will always change
- Inadequate assessment of the capacity, or infrastructure constraints and the consequences of delivering the three growth options
- Scale of proposals seems reasonable, agree more housing is needed
- Options below 600 or above 1100 homes per year would not be reasonable
- Gladman development- should be planning for 1100 new dwellings to help with affordability issues and should be looked at more strategically through multiple councils
- Hightown housing- reasonable starting point, however higher number should be sought to ensure enough sites are identified

Question Number 33**Question Text: Do you agree that the three growth levels proposed are the most reasonable to consider?****NO***If no, please explain your reasons, with reference to evidence where available.*

- Should use the Strategic Housing Market Assessment as these figures are the most accurate for the area
- Development should only meet demand and adjusted to reflect changes, and no development on the Green Belt.
- Development should consist of small developments which do not have as greater impact, including the re-use of brownfield sites
- Starting point for housing numbers should be informed by urban capacity of 476 homes with a maximum of Governments draft figure and this ignores the extension to Hemel from St Albans, and this figures would not require Green Belt release
- Housing numbers should meet local needs
- Development here would only serve commuters, building should not happen where there are not jobs to support them
- Believe that Government consultation paper is incorrectly described in option 3 maximum figure should be 602
- Premier Property Acquisitions- believe that option 3 is the only option available, as government calculation has to be adopted after September 2018. Run the risk of the plan being found unsound if lower numbers are sort, also falls below the South West Hertfordshire Strategic Housing Market Assessment figures.
- National strategy to promote growth outside the South East
- DTC between DBC and Three Rivers regarding the issues of Kings Langley
- Berkhamsted has already has significant development excluded from these numbers
- No quantifiable need for this level of development
- Anything above 476 would be detrimental to the quality of life
- Assessment of actual housing need e.g. property in Kings Langley have not been selling or renting recently
- Need to provide more affordable homes to offset high entry prices does not warrant the proposed numbers
- Higher options should be considered as housing number projections do not take into account high levels of migration
-
-
- Option 3 as this supports Governments new draft standard formula
- Should be greater consideration of building on unused and unneeded employment land
- Population growth should not be considered due to the extra Greenhouse gas emissions
- No breakdown of where these increases in housing numbers would be located in the Borough.
- Development away from the South East

Question Number 34 -

Question Text: Do you agree with the rejection of the following growth levels:

- 1. Continuing the current housing target (430 homes a year);**
- 2. 'Urban Capacity' option (476 homes a year); and**
- 3. Significantly above the upper Government figure (1,100+ homes a year).**

YES

If no, please explain your reasons, with reference to evidence where available.

-
- Berkhamsted- to take less growth based on existing levels of development in the area
- Have not considered ways to reduce housing numbers
- CPRE- do not support growth figures that cannot be provided through the town and village boundaries, unless there are exceptional circumstances for Green Belt release can be given
- Chilterns Countryside Group- options 2 and 3 over ambitious, 3 large towns best options, Tring and Berkhamsted face issues with their design, more difficult to address issues here also green belt etc. not sufficient work taken to calculate population growth and housing needs, within unproven methodology
- St Albans Diocesan Board of Finance- consider 756 homes to be starting point, flexibility in the plan to take higher numbers in response to the standard methodology
- Should consider minimum of 800 homes per annum based on market signals and a 10% uplift- based on changes since the SHMA was produced which has seen house prices increase at a higher rate.
- Crest Nicholson- options 1 and 2 would be likely be found unsound should be aiming for Government figure/methodology
- Do not believe the options fairly distribute development, only Hemel that can support growth due to infrastructure availability.
- Harrow Estates- Only options 3 will adequately provide for the full objective assessment of housing in Dacorum, 40% cap on option 2 will no longer apply once local plan is 5 years old
- **The Crown Estate** agree that all three growth options should be rejected as they do not envisage an appropriate level of housing growth. Options 1 and 2 would result in the diversion of housing growth outside of Dacorum; Option 3 of 1,100 houses per year is not realistically deliverable over the next Local Plan Period with regards to the housing market and the significant infrastructure required to support the high level of growth.
- **Lichfields Planning and Development Consultancy** state that it is potentially appropriate to plan for a higher level of growth than Central Government's upper figure of 1,100 houses per year.
- **Premier Property Acquisition** view that the housing figures Options 1 and 2 account for an insufficient level of growth in Dacorum and will result in the new Local Plan being found unsound.
- **Watson Howick** support the rejection of the alternative growth figures, but DBC should consider a more appropriate, higher level of growth.
- **Plato Property Investments LLP AND Berkhamsted Schools Group** agree that all three growth options should be rejected and propose that a growth figure higher than the objectively assessed need should be adopted, in order

to meet Central Government's housing aspirations. The 'Urban Capacity' option is not compliant with the NPPF which promotes the release of valuable Green Belt land for housing delivery; while option 3's upper figure of 1,100 houses per year is 2.5 times higher than the current adopted Core Strategy and is not realistically deliverable over the forthcoming Local Plan Period.

- **Gladman Development Limited** suggest that Dacorum should plan for delivering the upper Government figure of 1,100 houses per year, or 25,300 houses over the duration of the Plan Period, in order for meet central Government's aspiration to fix the broken housing market and build a Britain 'fit for the future' by increasing housing supply and the availability of affordable housing for first-time buyers.
- **Gallagher Estates** view that Dacorum should have considered adopting the Strategic Housing Market Association (SHMA) figure with adjustments made in line with the current housing projections, provided that the revisions to the NPPF do not alter the planning policy on housing requirements.
- The current housing figure of 430 homes per year should be continued
- Option 1 of 602 homes per year is the realistic housing figure
- Concern for the protection of the Green Belt land in Dacorum, places a strain on the local environment – Option 1 should be reconsidered to a lower housing estimate
- Higher density of development is needed
- The housing need in Dacorum should be addressed by the careful planning of housing development
- There is an ever increasing demand for housing but no explicit explanation for the reason Green Belt land is being built on – issue of immigration is a critical driver for the demand for housing
- Planning for housing growth according to vague estimates from Central Government could have a devastating impact on Dacorum
- There should be no additional development in Berkhamsted
- The housing figures for Dacorum outlined in the Issues & Options document should be reviewed. Moreover, prospective development sites such as East Hemel should be considered as contributing to the housing figures in Dacorum as well as the neighbouring local authorities; particularly given that the majority of infrastructure for the East Hemel site will be provided and funded by Dacorum, not St Albans City & District Council.

Question Number 34 -

Question Text: Do you agree with the rejection of the following growth levels:

- 1. Continuing the current housing target (430 homes a year);**
- 2. 'Urban Capacity' option (476 homes a year); and**
- 3. Significantly above the upper Government figure (1,100+ homes a year).**

NO

If no, please explain your reasons, with reference to evidence where available.

-
- Government housing figures are too steep and unsustainable for Dacorum to meet. It is critical that DBC adopts a Sustainable Policy within the Local Plan, especially considering climate change.
- **Taylor Wimpy Strategic Land** state that there is no evidential basis for rejecting growth figures higher than the locally assessed housing need; accordingly, Dacorum should plan for growth greater than 1,100 houses/year. The current figure of 430 houses/year and the 'Urban Capacity' option are derived from constraints-based methodology – this is incompliant with the NPPF, which requires objectively assessed housing needs to be met in full. In order for the Dacorum's housing needs to be appropriately assessed, up-to-date demographic projections and housing affordability data must be released. Moreover, the economic aspirations of the borough should be incorporated in the housing figure for the next Plan Period; therefore likely increasing Dacorum's growth level.
- **D B Land and Planning** agree that Options 1 and 2 should be rejected due to the need to meet the Government's growth figures in line with the NPPF (paragraph 47). Moreover, development in Markyate need to be realistically considered.
- There is confusion as to what housing figure is being adopted by Dacorum – the Hertfordshire County Council magazine 'Horizon', stated the growth figure for Dacorum as 9,581 houses over the next Plan Period, lower than the current housing figure of 430 houses per year.
- **Kier Property** suggest that the housing need in Dacorum is greater than 1,100 houses per year in order to accommodate the predicted housing shortfall within the HMA and to help meet London's housing need.
- **Harrow Estates PLC** agree that Options 1 and 2 should be rejected as they do not meet the FOAN for Dacorum or the tests of soundness as set out in the NPPF. Moreover, Options 1 and 2 do not comply with the Government's aim to boost housing land supply - a figure of 1,100 houses per year or more should be realistically considered and Option 3 should not be ruled out. It is crucial that DBC remain flexible in order to respond to any future revisions of the NPPF or Government standards for calculating housing need, including the Sub-National Household Projections.
- Realistic estimates of projected growth levels cannot be achieved until the Brownfield Register is published, as this is likely to reduce the demand for Green Belt land to be released.
- The Council has provided no clear reasoning on the 75% increase in the growth figure in the forthcoming Local Plan

- The re-assessment of the Objectively Assessed Needs for Dacorum should be the basis of further analysis into the appropriate housing figure for the Borough.
- All growth options are too high for Dacorum, and notably Berkhamsted, to physically cope with. Development should be focused in areas in need of urban regeneration with capacity for new housing.
- Development must be monitored throughout the Plan Period to assess the correlation between housing supply and demand – housing should be built on a basis of evidential need.
- The housing demand in Dacorum should be met by the provision of suitable land outside of the Green Belt due to the detrimental impact on local wildlife and ecological sites.
- Government figures are likely to be incorrect and speculative
- The accuracy and use of the Strategic Housing Market Assessment (SHMA) is questionable – there should be an increased provision of affordable council housing in Dacorum.
- The housing figures presented by Dacorum are somewhat higher than the figures outlined by the Office of National Statistics
- Development on Green Belt land should be refused until the next Plan Period, as growth levels may change considerably before 2036.
- The impact of the housing figure options on the capacity, delivery and cost of infrastructure needs to be appropriately considered
- The housing figure for Dacorum should take into account the Objectively Assessed Needs (OAN) and environmental constraints such as the AONB
- Appendix B states that housing need provides the exceptional circumstances that warrants the release of Greenbelt land.
- Housing should be more strategically planned e.g. creating a large new development in an area of Hertfordshire that has the capacity and infrastructure to support incoming growth; rather than infilling new houses into areas already over capacitated.
- Options 1 and 2 can only be rejected if brownfield sites and higher development densities are maximised, therefore ensuring that all options have been considered to avoid the release of Greenbelt land under 'exceptional circumstances'. Further, more rigorous engagement with neighbouring South West Hertfordshire local authorities should take place, ensuring that the Government's housing requirement is met and allowing additional growth to be accommodated by other administrative areas in the Hertfordshire and South East region respectively. Shendish, Hill Farm, Rectory Farm and Wayside Farm should not be developed upon.
- Decision on growth figures is premature given that the conclusions of the recent Government consultation on 'the 'Planning for the right Homes in the Right Places' have not been published.
- A realistic approach to affordable housing is needed – Dacorum's consultation board's statement that all Greenbelt sites require 40% affordable housing, however there is no evidence that this has been met – DBC should base housebuilding on a long term achievability.

- The majority of individual respondents accepted continuing with the current housing figure of 430 houses per year (option 1), and rejected Option 2 and 3; whilst a considerable number of respondents thought the growth level should be lower than that of the current figure. A high proportion of respondents (namely BRAG) disagree with the rejection of the 'Urban Capacity' Option 2 due to its restriction of additional Green Belt release and the maximisation of development in urban areas.

- Option 1 – current figure of 430 houses/year:
 - The current housing figure of 430 houses per year is unsustainable and too high for Dacorum to accommodate
 - The current level of housing growth at 430 houses per year should be continued as it is a realistic contribution to Central Government's increase in housing supply.
 - The need for affordable housing can be met by maintaining the current housing target of 430 houses per year
 - Growth figure should not increase due to the potential reduction in the UK population and immigration post-Brexit and the consequential need to preserve farmland for food production, not house building.
 - The current figure should be sustained as a base figure whilst Dacorum transitions into the next Plan Period
 - Suitable option given the infrastructure constraints in Dacorum – there is a need for infrastructure projections to directly relate to the housing targets for the borough within a given timescale.
 - The current growth figure should be maintained as an increase in the target will set a precedent for the release of Green Belt land driven by developers

- Option 2 - 'Urban Capacity':
 - Reasonable growth figure that would support both Dacorum's and Central Government's housing demand; whilst preventing the need for additional Green Belt release.
 - Sensible approach considering the uncertainties surrounding growth
 - Option 2 cannot be rejected until all Brownfield sites have come forward for development – there is a present lack of evidence to grant the 'exceptional circumstances' that allow for the release of additional Green Belt land.
 - Underestimates the potential of urban areas to deliver housing
 - Option 2 is outdated and does not reflect the current growth assumptions e.g. London market growth

- Option 3 – upper Government figure of 1,100 houses/year:
 - Option 3 should be rejected due to the uncertainty of Brexit and constraints on local vision
 - Higher figure of 1,100 houses/year should be tested – issues with step change in housing delivery in the next Plan Period and the ensuing environmental impacts. Consideration of the National Infrastructure Commission report on 'Partnering for Prosperity' in the Cambridge to Oxford

arc, which outlines the mismatch between the Government housing estimates and the locally assessed housing needs stated in the Strategic Housing Market Assessment (SHMA). There is uncertainty in the methodology of the SHMA that could potentially reduce the local housing figures e.g. the use of housing projections based on recent migration trends.

- Meeting this higher figure of growth will result in the breach of Dacorum's geographic constraints of the Chilterns AONB and the Green Belt. The new Local Plan can be found sound without the OAN being met e.g. Adur District Council, Sussex.
- The upper figure does not recognise the impact of additional development on already congested transport routes used by commuters
- It is an imposed, unrealistic housing target with no basis and should give further consideration to a large development in Hemel of 2500 homes or more and the potential impacts of development in Gorhambury.

Additional comments

- Greater consideration needs to be given to the potential impact of new development on the heritage and character of Dacorum
- Growth of small businesses should be encouraged in line with housing growth in Dacorum
- New development must conform to greenhouse gas reduction targets outlined in the Paris Agreement
- There is a confusion between housing need and demand, the latter being driven by the house-building industry
- Capital receipts from developer contributions should be spent on education and medical infrastructure in Berkhamsted
- Consideration needs to be given to planning for a large new town, rather than channelling inefficient, short term growth.
- Physical and social infrastructure in Tring is at capacity: secondary school requires expansion, insufficient local bus service serving the train station
- A report by the Chilterns Conservation Board on the 'Cumulative Impact of Development on the Chilterns AONB' needs to be taken into account
- Hemel Hempstead is the only area in Dacorum where there is sufficient infrastructure to support substantial growth
- The large Greenbelt releases do not consider topographic differences

Question Number 35**Question Text: Has the Council considered all reasonable alternative levels of growth?****YES***If no, please explain your reasons, with reference to evidence where available.*

- Support that the council has considered the reasonable alternatives, however they note that Bovingdon airfield brownfield site isn't being proposed.
- Believe the higher housebuilding figures are to satisfy demand from outside of the area (especially Berkhamsted) and this is making homes increasingly unaffordable.
- The council hasn't considered the rejected options properly.
- With regard to Site Tr-h1 at Station road Tring, the land near Ivy Cottage has, in recent years been, subject to extensive flooding & on occasion has severely flooded across station road. On looking on the Cranfield Soil & Agrifood Institute Soils Map this land is indicated in blue as Soilscape 20, "loamy & clayey floodplain soils with naturally high groundwater". These soils continue along the Bulbourne valley to Cow Roast which also regularly floods. This should be properly investigated
- The proposals do not appear to adhere to the principles. Development is not on Brownfield sites and by developing Green Belt farmland does not maintain the character of existing settlements.
- They have considered all reasonable alternatives to avoid intervention by DCLG.
- However, basing the planning targets on unknown quantities is both naive and potentially devastating to this borough.
- Lower figures, which could be sustainable and achievable within identified constraints, should be explored.
- The borough should be clear to distinguish the difference between need and demand.
- The SHMA identifies the quantum of Objectively Assessed Need for affordable homes as 366 per year [see Table 43 page 129, Intermediate 108/Social 258 Total 366]. This compares with the OAN total of 756 per year implying the demand for open market dwellings is 390 pa. If the policy priority is to build to meet the need for affordable homes, these could be accommodated within the prevailing target of 430 per year.
- The requirement for expansion and new homes is coming from the Central Government, and that your position is that Dacorum has no choice but to implement a plan and it is better to do that carefully, rather than refuse, and then be subject to Central Government dictating where developments spring up.

- DBC figures ignore the major extension to East Hemel that is proposed by St Albans.
- The starting point should be the Urban Capacity that does not require any Green Belt The current adopted local plan was set at 430 which included Green Belt release, DBC urban capacity is already 11% higher than that figure without further Green Belt release.
- Proper consideration of increased density including taller buildings in appropriate areas would release more capacity.
- The Government consultation categorically does NOT indicate that the larger figure (1,000- 1,100 homes) would need to be used for Dacorum's plan once it becomes more than 5 years old.

The consultation paper offers a '2-year grace period' while plans are prepared or reviewed over which period the cap of 602 could be applied until the next review in 5 years.

Question Number 35

Question Text: Has the Council considered all reasonable alternative levels of growth?

NO

If no, please explain your reasons, with reference to evidence where available.

BRAG – It is not reasonable to set a housing target above numbers achievable considering all the constraints of the area, which DBC have calculated to be 476 new dwellings per year, however BRAG would also contend that the figure of 476 underestimates the amount that can be achieved within urban boundaries. Brag has reservations about the methodology in the SHMA which calculated DBC’s ‘locally assessed need’, BRAG contends the constraints of the area means that the Urban Capacity has to be the starting point. One of the biggest driving factors for increased housing stock is the decreasing average number of residents per household and as argued in previous submissions the decline in household numbers has not progressed at the level previously predicted and BRAG would argue that the SHMA has not accounted for that.

CPRE – The Council needs to consider the capacity of the Borough to provide for growth as the starting point.

GFRA – considered at this stage that the Council have not exhaustively considered all reasonable alternative levels to growth as the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. Has been a lack of substantive discussion with other Local Authorities on exportation of growth. Also the consideration of exporting a substantial level of growth to another Council area has not been fully examined at this stage. (Less restricted areas like Aylesbury Vale and Central Bedfordshire).

Kings Langley Residents – Further discussions under the statutory Duty to Cooperate should be held with both Three Rivers and St Albans District Councils. Further work is required to ensure that the development yield from urban sites, previously developed land and imposition of appropriate higher densities is maximised.

MRAG – Lower figures, which could be sustainable and achievable within identified constraints, should be explored. A higher level of urban capacity for Hemel Hempstead (above the assumed figure of 8900) should be examined. This should take into account recent government statements encouraging the use of high rise buildings in appropriate locations.

Taylor Wimpy Strategic – it is necessary to consider whether planned growth may need to be higher than that set out within the standardised housing methodology calculations.

W. Lamb LTD – it is considered that the Council should be considering a growth option based on a minimum OAN of 800 homes per year.

Harrow Estates PLC – In accordance with the conclusions set out in the Turley Local Needs Assessment these options should not consider providing for a level of housing below 900 dpa. They should also consider the potential for housing needs to exceed 1,100 dpa

- People are confused as to why Bovingdon airfield hasn't been considered, it has access to the A41 which would link it to the M25.
- The numbers seem as if they've been plucked out of thin air as they haven't been explained.
- The council is too quick in accepting higher growth rates prepared by 'Consultants' who historically are invariably incorrect. Development must be at a controlled speed to monitor demand and there must be no upper limit that requires development on any Green Field sites in the borough.
- The Hertfordshire County Council news magazine circulated to all homes in Hertfordshire on pages 16 and 17 state a provision of 9,581 homes in Dacorum. These figures are considerably lower than any of the three options given for comment and support the 430 homes/year scenario.
- Bovingdon airfield and other empty commercial properties haven't been properly considered.
- None of these housing needs models seems to take any account of the effect on demand of Brexit, if/when it happens.
- How do we know the population will rise at the rate DBC is predicting?
- Need evidence of assessment of all brownfield sites before spoiling villages and small towns. Hemel Hempstead is a new town, totally able to support new areas of growth.
- Bovingdon floods every year in the High Street and along green lane.
- It is mentioned that areas considered for development would have all the necessary infrastructure in place. Neither Bovingdon nor Kings Langley would have the infrastructure in place for such a high volume of new housing.
- It is mentioned that the council would like to protect the character of important landscapes. By building houses in villages you are completely changing the character and landscape of villages.
- Sites identified in previous local plans have been ignored which could accommodate the majority of housing need required for Kings Langley.
- All areas in Hemel should be built on in the first instance.
- Have not considered the amount of empty properties in the borough and their potential.
- Population growth in Kings Langley over the past 10 years has been 2.8% according to the 2001 and 2011 census. The council has not made it clear why such significant new housing is needed in the village when historic growth has been limited.
- There should be powers in place to ensure suitable brownfield sites can be developed before considering any greenfield sites. I'm sure I would not be the only one supporting the use of council funds to encourage or even subsidise such a policy, providing any development was maintained at a sustainable level.

- If the borough is just accommodating people who have been forced out of London, these people are used to living in towns and won't worry that Kings Langley is being merged with Watford and Hemel.
- More homes should be built in the north using the HS2 instead of building near to London.
- More work is needed to identify brownfield sites and cross boundary cooperation
- Sites identified through preparation of a Brownfield Register (required to be in place by Christmas 2017) will also contribute to a reduction in the need to take greenfield / Green Belt land. BF needs to be considered before GB.
- A more imaginative approach is needed, for example, co-housing in Scandinavia is growing in popularity worldwide.
- consider building one purpose built new town or new section of HH
- This should take into account recent government statements encouraging the use of high rise buildings in appropriate locations.
- The term "locally assessed need" should not be used, because no research is presented in the consultation into the actual needs of local residents for a) housing which young people leaving home can afford and b) homes for older people seeking to downsize.
- Why are St Albans gaining credit for East Hemel?
- Plenty of small sites available in Dacorum, to avoid mass developments on greenbelt.
- Our birth rate is in decline – 1.79 children born per woman last year in the UK – so that's not fuelling the demand.

Question Number 36**Question Text: Do you support the proposed location principles?****YES***If no, please explain your reasons, with reference to evidence where available.*

- Too much emphasis on protecting local character, difficult to define and changes, comparison between old Berkhamsted and new development where there is a greater variation in building density, importance of regeneration as needs change
- Safeguard protecting character and preventing urban sprawl.
- Issues of road capacity, and traffic volumes and how this will worsen with development (Bovingdon, Berkhamsted, Kings Langley)
- Damage to landscape/ sight lines
- Development in areas at risk of flooding
- Infrastructure needs
- Need to provide affordable housing
- High density development in village locations cannot be supported
- Believe that the principles mean that option 1B is the most appropriate option.
- Maximising density of housing means that there needs to be better infrastructure provision (doctors, shops, play areas etc)
- Development to be focused around towns where infrastructure can support high-density housing.
- Proposals in conservation areas and areas of historic and archaeological interest/ significance.
- Developments impact on biodiversity and wildlife
- Principle that focuses development on the three main towns
- BRAG- No other sections of the consultation suggest that to support a 5 year housing supply it would require Green Belt release, understand the need for this to be located but believe that the Council do not know how to do this, and that location principles should include that it needs to be within the urban capacity.
- Allow housing on employment sites that are no longer required, and building at higher densities where this would not be damaging to the character of areas, this could achieve higher number than the proposed maximum capacity
- Do not think that just because sites are brownfield that they should be considered for development as these could be in unsustainable locations.
- Density should not reduce quality of housing or put strain on infrastructure or parking
- Housing should be spread more fairly across the Borough including smaller settlements such as Bovingdon helps to enhance sustainability and economic viability

- Changing of 5-year land supply to providing a mix of size and type of homes within the Borough.

Question Number 36**Question Text: Do you support the proposed location principles?****NO***If no, please explain your reasons, with reference to evidence where available.*

- Need for more lifetime homes- traditional housing and not flats- not in favour of high density development-high quality homes
- Issues in Bovington, road capacity and increasing pollution, wildlife and schools
- Development should be in Hemel Hempstead
- Brownfield and compulsory purchase
- Water availability
- Do not support the provision of 5 year housing land supply, Government should look at a way disburse pressure from South East
- Aging population
- Flood risk
- Housing should only be based on Dacorum's housing need and made locally affordable as addressed in the right homes for the right place document
- Berkhamsted has already taken high development
- Consideration of issues with topography
- Building high density at transport links will lead to high levels of congestion
- Locations should be chosen based on real need
- Reducing Greenhouse gas emissions in alignment with targets
- Need for new road infrastructure to support these high levels of development
- Expansion should only be on towns
- Focus growth on Berkhamsted as this is a more sustainable location based on car use and public transport use for commuting- Grand Union Investments
- Development at site TR-h5 is inappropriate based on the locational principles, there is already housing need in smaller settlements around the Borough more appropriate for small development rather than large ones
- Needs to be provision for providing more employment locally, to avoid overloading transport services
- Principles should include some of the criteria from the Sustainability Appraisal such as the impact on biodiversity and soils/ agricultural land
- Consideration of Chilterns report the Cumulative impact of development on the Chilterns AONB, principle on Chilterns AONB
- Principle on 5 year supply should be stronger.
- Need to consider the NPPF and own evidence base- need for more family homes and need to address the issues in Tring of aging population and unaffordable homes - consideration of socio-economic factors.
- Density should replicate local character- ensures that density levels stay the same and in keeping
- Removal of last principle as this has no impact on locations of development

Question Number 37

Question Text: Do you agree with the rejection of the following growth distributions:

- 1. New settlement (town or village);**
- 2. Rural growth;**
- 3. Export growth to another Council area;**
- 4. Use greenfield land before brownfield land; and**
- 5. Significant expansion of a large village(s)**

YES

If no, please explain your reasons, with reference to evidence where available.

Tring in Transition – No Comment

Gleeson Development – the alternative options listed are inappropriate and correctly rejected, in some cases on the grounds of lack of sustainability, and in some cases on the grounds of lack of deliverability/certainty that housing needs will be met.

The Crown Estate – Given the constraints on available land in Dacorum, it is considered that a new settlement is not a reasonable option. Exporting growth to another council area would not be socially or economically desirable and would conflict with the Duty to Co-operate. Using green belt land over PDL is not sustainable as PDL is an existing resource. Rural growth and expanding villages will overwhelm small communities, and will not be consistent with the NPPF.

W Lamb Ltd – Agree with the rejection of the growth levels listed above for the reasons listed in Appendix C of the Issues and Options consultation document.

Gallagher Estates – As set out within the Duty to Co-operate Paper (Appendix B), it has been identified that all neighbouring authorities are constrained by Green Belt and have limited capacity for additional growth. It is important that Dacorum Borough, therefore, looks to ‘consume its own smoke’ by accommodating the projected housing need within its own administrative boundaries.

- Most people stated in their support that they believe the best option is to focus on is the focus on the three towns of berkhamsted, Hemel and tring.
- People agree that the rejected options are not sustainable
- In addition, there was an acceptance of rejecting expanding large villages, as it will damage the heritage.
- There were also comments regarding the efficiency and deliverability of constructing new settlements or expansions.
- In addition, there were comments supporting that a new settlement would be good for infrastructure provision, but would damage the environment.
- Many people are still concerned about preserving the countryside and comments focused on ensuring that there is zero or minimal green belt development.

- Those who supported generally did mention that this question is in fact five separate questions.
- There is confusion regarding that we rejected exporting our need to another council, yet St Albans are developing on our boundary.
- Councils need to work closer together to maximise the efficiency of empty spaces and previously developed, but redundant land.
- In addition, there is no justification as to why Bovingdon airfield cannot be used as a new development.
- The most frequent point is that option C (upper government figure) is illogical as the council rejected expanding large villages.
- Another comment said 450 homes in Bovingdon would constitute significant expansion of a large village.
- If the council rejected prioritising green belt over brownfield, and significantly expanding villages then any option to develop on green belt land is illogical.
- At some point in the borough's history, (if demand continues) a new settlement will need to be considered, why not now.
- One comment suggested making growth seem more appealing, and encourage villages and market towns to be more open to growth (only so much of Hemel to build around...). This could be done by making the growth appropriate for the area, and feed into the heritage. Also, build smaller scale settlements, which will focus on community and integrate better.
- A few comments suggested that rejecting these options is best, as the focus now needs to be Hemel Hempstead, which needs help (town centre in decline, lack of infrastructure and deprived, unhealthy neighbourhoods).
- All of those options rejected are preferable to any significant development on the Green Belt.
- Having a greater range of sites and developers across the three towns (Option A) will accord with paragraph 50 of the Framework in having a range of sites.
- Endorse the location of significant levels of growth at the other two towns within the District. Berkhamsted and Tring are sustainable locations for development, and The Plan does little to champion the benefits which growth can bring to a settlement. It is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place. However, the disbursement of growth provides a far more sustainable pattern of development.
- Consider that there may be some merit in considering a new settlement to the north of the borough and a limited amount of rural development.

Question Number 37

Question Text: Do you agree with the rejection of the following growth distributions:

- 1. New settlement (town or village);**
- 2. Rural growth;**
- 3. Export growth to another Council area;**
- 4. Use greenfield land before brownfield land; and**
- 5. Significant expansion of a large village(s)**

NO

If no, please explain your reasons, with reference to evidence where available.

BRAG – exporting to another council area should not be rejected. Co-operation with St Albans was a key issue in the core strategy and the inspector said there should be a partial review containing the role that effective co-operation with local authorities could play in meeting any housing needs arising from Dacorum. St Albans refusal to co-operate should not be allowed to impact Dacorum. The Gorhambury development should contribute to Dacorum’s target. Agree strongly with rejecting “Use greenfield land before brownfield land” but this consultation document suggest that DBC have not done that.

Village Foundations – villages should not be seen as inappropriate locations for development. New housing of the right type helps residents stay in the villages and supports local facilities and services. Village Foundations calls for more realistic and helpful policies for rural areas and villages, in order to tackle real and pressing social and demographic issues.

Chilterns Conservation Board – given the high levels of constraint in Dacorum the option of accommodating the growth in less constrained council areas should not be rejected. Broader strategic and regional planning would help conserve the AONB. Also during the plan period, the Cambridge Oxford growth corridor providing 1m homes should take pressure off the land in the south.

Taylor Wimpey Strategic Land – disagree with rejecting options 4 and 5. Firstly, brownfield sites are in limited supply, and unlocking Greenfield land for development can in turn bring forward brownfield sites for development. Secondly significant expansion has not been defined what scale would be considered significant. The plan should consider the potential of rural settlements on an individual basis.

Home Builders Federation – until the council are clear on the numbers they need to deliver it is not advised to rule out any potential delivery options. This could leave the council in a position where they need to use a rejected option, and it is therefore better to leave all options available. Furthermore, the NPPF sets out the need for local planning authorities to be creative in seeking to meet growth needs.

Chiltern Society – the council should not reject exporting growth to other council areas. This issue needs to be considered regionally to afford true protection to the

AONB. There is a history of authorities working together, as they are signed up to the Chilterns conservation board and the AONB management plan.

GFRA – agree with the rejection of the growth distribution options apart from Point 3. Exporting growth from another Council area, which has previously identified within this report, has not been considered in sufficient detail in order to warrant its rejection at this stage

D B Land and Planning – it is not clear what is meant by “rural growth” does this mean directing development to large village locations as part of a balanced approach, or is it more specific in terms of directing the bulk of the Borough’s development needs into the rural area as a whole. Using brownfield first will be a detriment to the delivery of housing numbers. Suggests the development of Markyate.

Guinness Partnership – a small settlement on the railway line should be considered. There is very little brownfield sites available and Greenfield resources are essential to deliver 25,000 homes. Some rural growth will benefit and maintain existing settlements and facilities.

Plato Property Investment LLP – rejecting using Greenfield land over brownfield, as brownfield sites can have constraints, such as not having access to appropriate infrastructure, however areas such as cow roast south east of the mini dealership on London road, isn’t high quality farmland but is well served by links and infrastructure.

Berkhamsted Citizens – 1. New settlement: AGREE – no suitable site in dacorum. 2. Rural Growth: AGREE. 3. Export growth: DISAGREE - the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum’s total, as Dacorum will need to provide the facilities and much infrastructure for this site. 4. Use Greenfield over brownfield: AGREE. Strongly agree with the rejection of this however, the document suggests DBC is not doing this. 5. Expansion of village: AGREE – However, some expansion will support the viability of villages.

Hightown Housing – Agree with the rejection of all points, except, the sensible and controlled growth of a large village is supported to enable development to be delivered.

Shute Associates – agree that rural growth cannot accommodate a major component of the required growth. However, some rural growth could form part of a balanced strategy that spread development more evenly across the District.

C/O Bidwells – CPUK strongly endorse the location of significant levels of growth at the other two towns within the District. Berkhamsted and Tring are sustainable locations for development. The Plan does little to champion the benefits growth can bring to a settlement. CPUK does not agree that Hemel Hempstead should receive a greater focus of growth; it is accepted that Hemel Hempstead is the largest settlement and has infrastructure and services in place; however, the disbursement of growth provides a far more sustainable pattern of development.

MCJ Trust – It is clearly unrealistic that rural areas could accommodate the entirety of the Borough’s objectively assessed need; however, allocating a wide range of small sites across rural settlements will provide a boost to housing supply. This also overlooks the fact that the core planning principles in paragraph 17 of the NPPF

include supporting rural communities. Agree with the methodology of the settlement hierarchy, although do consider it is deficient in respect of smaller settlements. Overall, a dispersed strategy with a few homes allocated to each smaller settlement in the rural area would cumulatively assist with the delivery of higher growth options across the Borough and complement larger allocations elsewhere.

Berkhamsted Schools Group – It ignores the fact that brownfield sites can have constraints that make them difficult to develop, including viability issues. Not all brownfield sites are in sustainable locations and may not be well served by appropriate infrastructure etc. Many brownfield sites are in key/established employment areas and are protected from alternative uses. It is simply not possible for the council to deliver the number of homes that are required to meet future needs, without developing Greenfield sites. We agree that the council should seek to deliver development on brownfield land where possible, but should certainly not hold back much needed new development on Greenfield sites.

MRAG –

1. New settlement: AGREE – no suitable site in dacorum. 2. Rural Growth: AGREE. 3. Export growth: DISAGREE - the allocation to the east of Hemel Hempstead within the St Albans area should count against Dacorum's total, as Dacorum will need to provide the facilities and much infrastructure for this site. 4. Use Greenfield over brownfield: AGREE. Strongly agree with the rejection of this however, the document suggests DBC is not doing this. 5. Expansion of village: AGREE – However, some expansion will support the viability of villages.

- Most people are not satisfied that the Council have considered the possibility of a new settlement, as an alternative to the proposed expansion at Hemel, Berkhamsted and Tring.
- Unsure why Bovingdon airfield has not been discussed as a potential new settlement in the consultation.
- Bovingdon could follow examples such as Leavesden Airfield or Hatfield Airfield. The council should explore this option with the landowners.
- Again was mentioned that this is five separate questions, so people agree partially. The main area where people disagree with the rejected options is the building of a new settlement. Many believe this would be a viable alternative to expanding existing settlements.
- Many people believe that councils need to cooperate and disperse the housing need appropriately.
- Working with councils and allocating Dacorum's need to other areas would unlock spare unused land and buildings.
- There is a general agreement on the rejection of using green belt land over PDL, and significantly expanding larger villages.
- One comment stated that it is more attractive for the Council to propose developments at sites, which have been "land banked" by developers, as opposed to building a new settlement.
- Another comment said why reject building two or three standalone new settlements on PDL.

- There is no need to expand any other town than Hemel Hempstead as it has the potential for growth, and will protect rural historic villages and towns.
- On the contrary those who believed that there should be more rural development, said that focusing all of the demand at Hemel Hempstead will make its infrastructure and deprivation problems worse with new urban problems such as a lack of jobs, a lack of affordable homes and overcrowding.
- The middle ground says that Hemel Hempstead has the largest potential but the area needs serious improvement before mass scale expansion is considered. There is potential for a new town at the north of Hemel.
- Exporting to another council area should not be rejected, especially regarding the st Albans development on East Hemel, as Dacorum will need to provide the infrastructure to cope with this settlement.
- Not considering rural growth, towns that already have limited facilities will continue to suffer. The council should actively promote limited and high quality development of rural areas.
- People are also unsure as to why there is no development in the long Marston area, as it has close links to Aylesbury and Cheddington station.
- Rural growth and significant expansion of a large village would surely support the strategic economic policy, which supports commercial enterprise and employment opportunities in market towns and villages, to support rural enterprise.
- A completely new village could be created near good transport links, which would take the pressure off Bovingdon, Kings Langley and other rural villages.
- Difficult to understand how the option of using greenbelt land before brownfield has been rejected when this consultation document suggests DBC have not done that.
- A few comments are suggesting that expanding Hemel means no green belt development.
- Meeting some of Dacorum's target in the Gorhambury site should be included in the plan.
- What are the reasons a new settlement has not been considered?
- Follow leads of Aylesbury vale, as many people are leaving the borough for less costly housing. Therefore building a new settlement of less costly homes will be a sustainable solution to keep the area from declining, and just building around the edges of existing areas, which were not designed, for a large population.
- The centres of the towns already cannot accommodate the growth, therefore housing should be spread more evenly across the borough to encourage the benefits of growth in rural areas, and protect the infrastructure of the three towns.
- Significant expansion of Markyate should be considered, with its links to central Bedfordshire (very up and coming area).
- A new settlement near a railway station should be considered due to the demand for those moving outside of London.
- There is very little suitable brownfield sites, and Greenfield release is essential to accommodate 25,000 homes over 25 years.
- Some rural growth needs to be considered to maintain existing facilities such as schools and shops viable.

- Lack of growth discourages young people staying in an area, and the borough is ageing.
- Do not agree that it is appropriate to reject the use of green belt land, as it is not possible for the council to deliver the number of homes required using only brownfield sites.
- A new settlement in another borough as Dacorum is not suitable due to green belt and AONB coverage; however, there is a lack of regional co-operation.
- St Albans needs more pressure to co-operate.
- Sensible and controlled growth of a large village would enable development to be delivered.
- Do not agree with the outright rejection of rural growth option. Rural growth should complement the growth options in larger towns. Appendix C also dismisses growth in the rural areas as “not complying with Government planning guidance”. This is a vague conclusion that overlooks the fact that the core planning principles in paragraph 17 of the NPPF include supporting thriving rural communities within the countryside.
- Flaunden is not an isolated group of homes (even with a population of 300) it is a village therefore this (and the other small villages) should be considered as part of the settlement hierarchy.
- A dispersed strategy with homes allocated to each smaller rural settlement would cumulatively assist with the delivery of higher growth within the borough. The rejection of rural growth overlooks the objectives of the NPPF in enhancing the vitality of these areas.
- A new modern settlement, with new houses, park, allotments, walkways/cycle paths, nursery school, infant & junior schools, Secondary school, Health surgery with GP’s, dentists, complementary therapists, shops & more trees.

Question Number 38

Question Text: Has the Council considered all reasonable alternatives for distributing growth?

YES

If no, please explain your reasons, and set out what other alternatives we should consider, with reference to evidence where available.

- **Tring in Transition; no comment made.**
- **D B Land & Planning; agrees the council has considered all reasonable alternatives to growth.**
- **The Crown Estate;** scope exists for a 'hybrid' which combines elements from different options.
- **The Little Cloth Rabbit;** Ability to use alternative options hasn't been established fully.
- **Gladman Development Limited;** scale of housing growth means growth will have to be spread across the borough. A mix of site size and location needed. Reliance on large strategic sites has major risks in achieving total housing needs
- **Hightown Housing Association**
- **Silversaw Ltd;** support of option c, with all 3 smaller settlements accommodating for future growth also.
- **W Lamb Ltd;**
- **Millbank Land;** focus on three towns. Tring is well placed to sustainably support growth. May alleviate pressure on HH if distributing more evenly growth onto Tring and Berkhamsted. Careful site allocation could ensure impact on green belt land is minimised.
- **Gallagher Estates;** a significant increase in dwelling provision needed can only be achieved through a combination of the options presented.
- Option 1a.
- Confusion over whether the document is suggesting growth policies showing what might happen rather than what should happen.
- Policies inconsistent with strategic economic policy of supporting rural enterprise.

Question Number 38**Question Text: Has the Council considered all reasonable alternatives for distributing growth?****NO**

If no, please explain your reasons, and set out what other alternatives we should consider, with reference to evidence where available.

- **Home builders;** challenge the need to use brownfield land prior to greenfield sites. DBC cannot meet growth needs focussing on inner urban areas. Unnecessary delays of delivering greenfield sites DBC is limiting its options to provide needed growth to borough. This should be found unsound.
- **CPRE - The Hertfordshire Society;** skewed by availability and promotion of greenfield sites by developers. Growth should concentrate on land and buildings within settlements that can be developed/redeveloped. This should be considered first.
- **Grand Union Investments C/O Savills;** prefers Option A. An approach should focus on growth over all three towns. Undue emphasis for growth should not occur on HH. A higher proportion of working population live in Berkhamsted that travel to work by public transport rather than HH. Focussing growth on HH will mean infrastructure becomes unduly overburdened. A greater focus of growth on HH is likely to create a greater risk to delivery because of the reliance upon one local market to absorb enhanced levels of market sales over and above previous rates. A strategy that identifies Berkhamsted equally alongside HH and Tring, will be more flexible and more likely for the plan to be found sound. Table 4 indicates only 3 settlements outside of three main towns benefit from accessibility to at least 6 key services, thus all other areas outside of three main towns are unsuitable. A suitable balanced approach is required.
- **Chilterns Countryside Group;** HH a larger town with greater scope for supporting infrastructure. All 3 towns surrounded by Chilterns AONB. HH traditionally grown central outwards, while Tring and Berkhamsted being traditional market towns grow more organically, with the centre being linear. DBC used methodology that has not been consulted on and therefore is not compulsory to use. DBC should take into account the strengths and weaknesses of each town in terms of supporting growth, as each one is very different. This is currently not taken into account when determining distribution of growth across the borough.
- **Berkhamsted Citizens;** Three main towns differ in topography and infrastructure constraints which should be considered. Inspectorate reports suggest HH as the centre for growth and change. Sustainability credentials of HH would support further growth. Berkhamsted & Tring lack sufficient facilities at present to support growth.
- **C/O Bidwells;** supports option A. strongly endorse growth in other two main towns in the district rather than HH. Plan doesn't recognise the benefits of growth in Tring & Berkhamsted, and the positive impacts the growth will bring. Far more sustainable to distribute growth more evenly.

- **Capital & Regional Plc;** HHTC can accommodate significant levels of growth for new homes and jobs, further information regarding infrastructure requirements can be discussed as the capacity and scope develops for growth in this area.
- **Kings Langley and District Residents association;** further work on cross-boundary co-operation needs to be completed to further duty-to-cooperate responsibilities. Further work needed to ensure that higher densities of growth are accommodated for in urban sites and previously developed land. Further discussions with SADC and TRDC are needed to determine housing allocation.
- Green belt 'incursion' north of HH not acceptable.
- All three options are logical, however unbalanced in its approach to deliver growth.
- Proposal only considers land put forward by developers.
- Insufficient consideration for the possibility of a new settlement having less impact on AONB.
- DBC not fully explored brownfield sites. Pressure from national government should be challenged. More evidence should be collected prior to rushing planning applications. Reconsider redistribution/change of use to existing industrial sites that are underperforming, not fully occupied or are simply not an efficient use of the space provided.
- Council should prioritise consultants' advice over developer recommendations for growth.
- Small towns and villages endorse higher use of fossil fuels. A new town that fully embraces environmental and ecological objectives would be of benefit to meeting housing targets. It must support all ages to zero carbon standards.
- Needs to be more of a push in LA's approaching developers with potential sites that DBC have concluded are suitable to meet local need, not developer's needs.
- Many empty houses across the borough, these should be addressed first before building new sites.
- The need for new houses should be seen as an opportunity for the town it impacts, in particular HH if it is where the growth will be focussed. The need for new houses in the area can be seen as a way to enhance HH – making a positive impact on local economy.
- Suggestions to build homes on top of out-of-town retail units is a possibility to meet some of the housing target, and relieve pressure on Kings Langley to provide for some of this need.
- Consult with county council upon lining new housing along better train line services such as Thames Link.
- Should be re-written as a Mission Statement with proper objectives. DBC should learn from AVDC on Garden Town principles and develop around HH in a sustainable way. Improvements to local infrastructure and enhancements to transport, open spaces, local centres etc could all help regenerate the area.
- Good quality green belt land of borough are being sacrificed for 'damaging development' especially with the expansion of HH, in which land north of HH.

- Objection to sit by Ivy House Lane, Berkhamsted. Local employment can be found better in HH (Maylands), growth should concentrate there.

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

YES

If no, please explain your reasons with reference to evidence where available.

- Do not believe that buy to let will help the situation of increasing house prices
- Believe that this is the least bad option
- Lower options should be considered to restrict growth around London, as there is no reason to burden this region with unsubstantiated needs.
- Most of the housing need should be meant at north east of Hemel Hempstead
- Makes the most sense as the assessment of the sites in Kings Langley are flawed/ valued parts of the community
- Development in Hemel excludes the St Albans development and so this would make the M1 difficult to access and needs to be considered
- Large scale development in the villages would result in the loss of a village community
- Need to carry out an Environmental Impact Assessment and a Transport Impact Assessment on the proposed plans safety issues regarding the road and in a pedestrianised area and how this will be considered
- Untried affordability ration methodology.
- Option C would mean unsustainable sites would be developed and worsen traffic pressure in the area and would result in the loss of natural canal embankments
- Issues of drainage and flood risk
- Does not consider the additional strain of housing from the two waters master plan
- Inconsistency in housing need and migration/ population figures (roughly 5% housing surplus)
- Believe that little of the housing produced would be affordable

Question Number 39

Question Text: Is Option 1A your preferred option for delivering the growth needs of the Borough?

NO

If no, please explain your reasons with reference to evidence where available.

- Need to build more houses to resolve housing crisis, plan does not account for extra pressures on infrastructure (roads etc) greater investment needed at proposed levels of development.
- Does not consider the constraints of the Borough
- Do not believe that Markyate should take 200 homes due to the recent amount of development
- Support tring town council response- Growth can only be provided in Hemel Hempsteads' capacity Green Belt AONB and policy CS1 suggest that only modest development can happen in the market towns, larger villages, and rural areas and allocations take up this capacity, lowest level most appropriate, appropriate for mixed development on site Tr-h5 Dunsley Farm would address the existing priorities from the 500 houses in the Core Strategy in Tring include employment, land, sports and leisure, social rent, affordable housing, and affordable shared ownership and ensure that there is minimal impact on the countryside * *Note: Tring Town Council was a supporting comment.*

Question Number 40

Question Text: is option 1B your preferred option for delivering the growth needs of the borough.

YES

If no, please explain your reasons, with reference to evidence where available.

This option would put the least pressure on the restricted infrastructure of the market towns. Berkhamsted delivered 10 years' worth of new housing stock and by 2016, the rate of development had exceeded Core Strategy targets by 34 %. All of this was done without any improvements in infrastructure with the result that the roads in Berkhamsted are already heavily congested and car-parking facilities in the town are barely adequate

Hemel is a new town not a market town, therefore it has more modern infrastructure to support growth.

Do not threaten Sunnyside rural trust as it provides an important community service and employment opportunity for adults' with learning difficulties.

Berkhamsted is above target (34%) whilst Hemel is below (-21%).

Central Government's policy on Green Belt is clear – "demand for housing alone will not change Green Belt boundaries" (letter to MPs from Minister of State for Housing and Planning – June 2016).

Demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted.

- Hemel is in need of regeneration, and more growth will bring this.
- Should focus on Hemel as the housing is near where jobs and services are, this will limit the environmental impact caused by commuting from outside of the borough centre.
- Consider the amount of vacant space in Hemel town first before building on market towns and villages.
- Any more growth than what is proposed here would not be appropriate, as there is no evidence to confirm that the area's infrastructure could cope with this influx of people, especially Watford A&E and medical services.
- Hemel needs its infrastructure regenerated for growth, but it will adapt the easiest.
- Why build more houses than what the government requires.
- No need to develop the market towns, so they can remain as market towns.
- Many believe that the market towns are not sustainable locations. (no bus networks, rail networks, shopping and adequate roads).
- Until there is evidence that new infrastructure in market towns will be provided 1B is the only viable option.

- However, the 2980 houses on Green Belt Land should be removed and other options considered.
- The market towns are full. In addition, they are being punished for being affluent with more development, which inevitably will cause decline.
- A larger population in Hemel Hempstead might even promote regeneration of the Marlowes shopping area and justify better utilisation of Hemel Hempstead hospital, which would benefit the whole Borough.
- “It’s staggering that it can even be considered for Berkhamsted. Does anybody from the council ever visit the town? Do they ever check on the traffic? Do they use crayons to write?”
- Option 1B represents the least harm to the greenbelt.
- New developments focused on Hemel Hempstead would encourage an increase in the facilities for this large town.
- Building on greenbelt land between Bell Lane & Darrs Lane must be excluded, as here is a wildlife concern, this area of greenbelt land is surrounded by hedgerows on all 4 sides.
- Approximately 10 years back, between Bell Lane and Darrs Lane there was a very large sinkhole collapse. Many local people think that there could be a number of other large sinkholes hidden beneath the surface of the proposed land between Bell Lane and Darrs Lane. This should be investigated.
- 1B makes good sense, and will support the Maylands Estate. Any other option would seem to be a triumph of politics over reason.
- Must consider east Hemel numbers at the Gorhambury development.
- No new sites on green belt until (a) all 'Brown Field Sites' in Dacorum have been identified, fully assessed and evaluated for house building. (b) All Government/State owned land within Dacorum has been identified, fully assessed and evaluated for house building. E.g. land owned by; MOD/RAF such as Bovingdon Airfield on which I guess a completely new village could be built in excess of 1000 houses. National Health Service, National Rail/Rail Track, Water Authorities, etc. Herts County Council such as Education and Highways Authorities etc.
- This follows the settlement hierarchy the best.
- This will make the best use of existing infrastructure, and regenerate it, rather than needing to build more.
- Make Hemel Hempstead into a larger and more attractive town with all the facilities that a large town would be expected to have.
- Very little money has been spent on the centre of Tring and Berkhamsted but Hemel has had millions of pounds poured in and this should have prepared it for expansion. I therefore suggest that the only option that should be considered is Option 1B.
- “Option 1B is clearly the best solution for Berkhamsted. Otherwise you risk ruining the quality of life of its residents. This is not ‘nimbyism’ – as already stated we have already done our bit, more than our bit, so do not spoil people’s lives in order to tick political boxes and make a few quid”
- More affordable homes are needed to help locally people find places to live. Very few have been built in Berkhamsted and we need more. We do not need more expensive housing, which makes money for developers.
- Hemel can accommodate houses as it has many local centres and shops, whereas the market towns are limited by services.

- Each option should have a rough cost or delivery timetable.
- Many support 1B but not the extra 600 homes.

BRAG – This is the best of the options offered and concentrates the growth on Hemel Hempstead, which as a new town that is far better equipped/designed to grow as confirmed by the Core Strategy Inspector when referring to “the sustainability credentials” of Hemel. Forcing massive growth on the Market Towns is not acceptable given the infrastructure limitations and would destroy their unique nature. Berkhamsted should most definitely not be punished because the town has developed at a faster rate than required by the plan. The Core Strategy Planning Inspector was in full agreement that the focus for development should be on Hemel. This option concentrates development on Hemel and provide best option for new supporting infrastructure. Be proud for the contribution the town has already made to the housing needs of Dacorum.

RPM Business Consulting Limited – strong preference for Option 1B amongst those proposed in your consultation document. I do not regard this as being in any way ideal, however, because it is clear that the development of Berkhamsted has been disproportionate compared with neighbouring areas (especially Hemel Hempstead). Berkhamsted’s lack of green space and other amenities, such as play space, has been recognised for many years in your own documents and I find it astonishing that the planning authority is not doing more to address the lack of infrastructure, for example sewerage, before allowing more development

Chiltern Society – Option 1B is probably the least damaging in that it would concentrate development on Hemel Hempstead where, although some sites are likely to be in the Green Belt, it would not encroach on the AONB. Concentration of development would help to create opportunities for a more co-ordinated approach to associated infrastructure. Option 1B also provides for some development at Tring and Berkhamsted and the larger villages, whilst limiting development in rural areas and encroachments into the Green Belt and AONB. This would spread out the effects to some extent.

Chilterns Countryside Group – With the qualifications above, but recognising that growth and change can be beneficial if approached in the most appropriate way for the individual location, the CCG's preferred Option from those given in the Consultation is Option 1B.

Berkhamsted Citizens – This is the best of the options offered and concentrates the growth on Hemel Hempstead which as a new town is far better equipped/designed to grow. Forcing massive growth on the Market Towns is not acceptable given the infrastructure limitations and would destroy their unique nature. However, we understand that this could threaten the Sunnyside Rural Trust in its Hemel Hempstead location, which would be to lose not only such an important community resource but also unique employment opportunities for adults with learning difficulties in the borough.

Grove Fields Residents Association – the strategy should seek an amalgamation of Options 1B and 1C. The amalgamation considers that the predominant allocation should be prescribed to Hemel Hempstead. The remaining housing supply should be proportionally spread throughout the remaining settlements, including smaller

settlements that can cope with incremental growth. Option 1C for example provides a higher quantity of development to Kings Langley, which is considered proportionate given that Kings Langley has been allocated as an area for future employment growth. GFRA full document attached to question 46

MRAG - Berkhamsted is above target, and even more houses are planned for Berkhamsted. If they have to choose an option it would be 1B , which limits building in Berkhamsted to the 600 houses already planned. Berkhamsted lies in a steep sided valley with growing infrastructure concerns. Dacorum Borough Council should omit Be-h3; Land at Ivy House Lane from the final local plan as it isn't a viable site. This is the best of the options offered and concentrates the growth on Hemel Hempstead which as a new town already has large amounts of public open space and is far better equipped/designed to grow. Forcing large amounts of growth on the market towns is not acceptable given the infrastructure limitations and would destroy their unique nature.

Question Number 40

Question Text: is option 1B your preferred option for delivering the growth needs of the borough.

NO

If no, please explain your reasons, with reference to evidence where available.

- Too much destruction of Hemel's high quality northern green belt.
- Focusing on Hemel Hempstead will mean it merges with kings Langley.
- Not equal. Not a fair distribution. Seems disproportionate for Hemel.
- Against any development near Shendish as It is part of kings Langley.
- Here should be an alternative with 0 development in the green belt.
- Too many new homes without the supporting infrastructure in Hemel. Hemel needs regeneration first.
- Hemel Hempstead is already at maximum capacity with an infrastructure that barely supports the existing level of housing. Concentrating development here will lead to increased traffic volumes, meaning increased travel times, or a massive increase in road capacity, which will damage the environment even more. The need for new housing has to be balanced with the other objectives of the overall plan.
- There is no benefit for Markyate. More homes in this area should bring more infrastructure.
- Piccotts end would be swallowed by Hemel Hempstead.
- It is unfair for 1 town to accept all the growth, especially in a town with a number of urban issues.
- There should be no allocations on Hemel's green belt.
- This option would not meet the housing need of the whole borough, just Hemel. Decreasing the viability of the other areas.
- Too much development, needs less.
- The numbers should include the Gorhambury development as this will also put immense pressure on hemel.
- There needs to be affordable housing across the entire borough so children of local residents don't have to move away.
- Kings Langley needs to be protected to avoid becoming a suburb of Hemel. Is placed in a no win situation.
- There needs to be a study on the current demand of services and infrastructure.
- We should consider building on Bovingdon airfield.
- This option doesn't protect the viability of smaller villages.
- Not enough homes, should be focused on a more option 3 based scenario.
- If all the homes are built in Hemel, the infrastructure will be concentrated there, meaning people in the rest of the boeough will have to commute, causing problems for Hemel and environmental damage.
- Locate development where people are likely to be employed, i.e. the three main towns.
- No growth in the two towns will mean young people there will struggle to find homes and employment. This leads to urban issues.

- Building on Hemel's green belt, especially the northern green belt, is a wildlife concern and the appropriate.
- Impact on Watford General Hospital (to facilitate all extra residents of the development. Watford General's current CQC result is requires improvement, this can only get worse with all the extra patients it will incur as a result of these developments)
- Wildlife and countryside will be destroyed in the northern Hemel Hempstead green belt.

Tring in Transition - No. It is not based on objective evidence (projected population growth) as required by the NPPF.

St William Homes LLP - Growth option 1 would fail to meet DBC's locally assessed need, thus fails to accord with paragraph 47 of the NPPF, and fundamentally contradicts current and emerging Government policy on housing delivery.

D B Land and Planning – DBLP does not support either option for delivering the levels of growth which are required in the In conjunction with other representations, DBLP questions the overall validity of the housing number proposed, given the clear guidance in the DCLG's Planning for the Right Homes consultation document. In the case of Option 1B this only proposes limited releases for green belt development in the Borough. In Option 1B's case, the proposed focus of development on a handful of locations green belt fails to consider the impact such a strategy has on sustainable development. This undermines the ability of Larger Villages in the green belt to accommodate modest levels of growth to support the vitality of settlements in accordance with paragraph 55 of the Framework. The evidence base for DBLP's site MY-3A (in the Arup Report) has identified that it is suitable to be released from the green belt. Paragraph 84 requires the policy maker to consider the "consequences for sustainable development".

Gleeson Developments Limited – Option 1B relates to a level of housing growth that is substantially below OAN, and therefore Option 1 generally should be rejected (see also our response to Question 16). Option 1B ignores the housing needs of the three larger villages – even in scenarios that seek to accommodate the majority of development at the three main towns, it is inappropriate to make no provision at the larger villages, to sustain their growth and provide for local needs.

The Crown Estate – of the three variants of Option 1, the greatest focus on Hemel Hempstead in 1B is considered to be the most appropriate. This is because it is the most sustainable town in the Borough with the greatest range of facilities, jobs and public transport. However, a housing provision of 602 homes per year would fail to meet the housing needs of the Borough. This option proposes a lower level of housing than either the latest SHMA or the Government's Housing Needs Assessment for Dacorum after September 2018

Plato Property Investments LLP – Growth options 1A to 2B are unacceptable as they do not propose any new homes in the 'Rest of the Borough'. This is also inconsistent with NPPF para 28 which advocates that " Planning Policies should support economic growth in rural areas..." The level of growth allocated to the 'Rest of the Borough' (including Options 2C and 3) should be increased significantly as these

options are all below and inconsistent with growth allocated in the current adopted Core Strategy Question 40 Is Option 1B your preferred option for delivering the growth needs of the Borough? No, for the reasons given in our response to question 39.

Majesticare Ltd – do not support option 1B as this options identify either only a small number of homes to be developed in the Green Belt in Berkhamsted. The options also both propose the limited expansion of Berkhamsted. We consider that land designated as Green Belt will need to be released for residential development, and that option1B does not realistically reflect this requirement.

C/O Bidwells – CPUK suggest that DBC should plan for a hybrid between options 2A and 3; where a housing target of up to 1,100 dwellings per year is planned with a distribution focussing on the three main settlements.

W Lamb Ltd – the draft Government figure is not considered the correct starting point for setting the Council's housing target and thus none of the 'Option 1' growth options are considered appropriate.

Fairfax Classical Properties Ltd – consider strongly that this proposal will not provide sufficient housing to meet the OAHN for the Borough, even at current levels, and therefore this option should be dismissed.

Gallagher Estates - Gallagher Estates do not consider that any of Options 1A, 1B and 1C could deliver the growth needs of the Borough. As identified on p.88 of the Issues and Options consultation document, the Option 1 figure of 13,846 homes in the plan period, or 602 homes a year, would not meet the Council's locally assessed need within the SHMA and would be below the raw household projections and result in unmet need arising in the Borough.

Question Number 41

Question Text: is option 1C your preferred option for delivering the growth needs of the borough.

YES

If no, please explain your reasons, with reference to evidence where available.

- 1c is the most equitable. Many people comment that it is the fairest option.
- It makes most sense to spread the benefits and negatives of development though out the borough in a fair and equitable fashion.
- 1c will have the least impact on Piccotts end, as the other options where lots of development is focused at Hemel will engulf the village.
- Other options include levels of density that isn't possible without causing environmental destruction.
- Areas HH1a, HH1b and HHh2 will engulf a designated conservation area and will lead to even more traffic in what is an already congested area.
- It prevents Hemel sprawling into the green belt, especially the land at the north of the town.
- Supports other areas of the policy such as strategic economic policy. It also ensures that there is no overloading of any one area, which will lead to significant issues with local infrastructure.
- The provision of housing should be spread over the borough to widen the scope for use of brownfield sites, or sites which would least harm the environment.
- Protecting green belt and open farmland by using brown field sites, including Bovingdon airfield, and having the lowest possible number of new houses i.e. the 467 outlined in the Urban Capacity Assessment.
- This is the least damaging option to any single area.
- As long as the numbers are based on DBC's Urban Capacity assessment.
- This option would support some provision of affordable housing in the villages.
- As long as option, 1c rejects any development at Shendish.
- Given that the options in the plan does not allow the choice of zero additional housing, option would spread the building load across the widest possible area.
- We consider the site at Bank Mill Lane to be a logical expansion of Berkhamsted as a town and that land designated, as Green Belt will need to be released for residential development in order to provide sufficient and suitable land to meet the growing needs of the borough for all types of development.
- Option 1c must provide adequate provision of elderly care accommodation.
- Responding to paragraph 182 in the Framework (NPPF) that requires local plans to be based on proportionate evidence.
- Development across the whole borough may bring unexpected benefits, these have not been addressed in the plan.

D B Land and Planning - In conjunction with other parts of this submission, whilst DBLP question the use of 602 dwellings as a target, it does support Option 1C because of the allocation of 160 dwellings in the green belt at Markyate. This should be at Land south of Markyate My-h1.

Grove Fields Residents Association - the position of the GFRA that the strategy should seek an amalgamation of Options 1B and 1C. The amalgamation considers that the predominant allocation should be prescribed to Hemel Hempstead. The remaining housing supply should be proportionally spread throughout the remaining settlements, including smaller settlements that can cope with incremental growth. Option 1C for example provides a higher quantity of development to Kings Langley, which is considered proportionate given that Kings Langley has been allocated as an area for future employment growth. GFRA full document attached to question 46

Majesticare Ltd - We strongly support options 1C, 2A-C and option 3 proposed. All of these 4 options identify significant numbers of homes in the Green Belt. These 4 options also favour the significant expansion of Berkhamsted as a town. The site at Spring Garden Lane is designated as Green Belt, but is a suitable and sustainable location for the development of a specialist residential care home. Registered care provision falls within a C2 use class; however, the provision of a high quality care facility will assist in the release of C3 properties

Question Number 41**Question Text: is option 1C your preferred option for delivering the growth needs of the borough.****NO***If no, please explain your reasons, with reference to evidence where available.*

- Tring does not have the infrastructure to support the 'ridiculous' expansion. Housing can't be put in place without social provision, and with the lack of central government investment, this provision is unlikely.
- The character of towns and villages will be damaged and the boundaries will sprawl into other settlements.
- Kings Langley would not class as a village anymore. Would be merged with Hemel.
- It would cause traffic chaos, and there are already huge issues.
- Too much building on green belt.
- 400+ homes in Bovingdon would change the nature of the whole village. The Bovingdon spatial strategy document highlights the insufficient facilities.
- 1c seems disproportionate, for Tring and the villages.
- This causes too much destruction of high quality farmland.
- No housing allocated to Hemel, which is in the most need. Suggestion that this was an error.
- Hemel needs affordable homes not building here seems irresponsible.
- There are number of villages with no allocation.
- This doesn't allow the amount of land available at Hemel to be utilised.
- With no supporting infrastructure developments in the last 20 years and no eligibility criteria for a contribution towards these from local landowners, the villages are not able to absorb the expansion plans.
- Homes aren't being built in the right places with this option. Against central government (fixing our broken housing market).
- If Hemel isn't given any new homes or development the Maylands wouldn't be successful.
- Too much development in the rural area (has no constraints technically).
- Building homes in villages will just increase dependency on the car as all the major services are in the towns.
- Not considered an Option whereby Green Belt Development is spread across Hemel Hempstead, Berkhamsted and Tring AND the larger villages. It seems to be either Hemel OR the larger villages.
- Old market towns and Villages simply were not designed to support this growth, especially concerning transport.
- All existing farmland should be preserved. The future following Brexit and with climate change is uncertain.
- Green Belt designation is not the only consideration for growth locations. We also need to consider how sustainable these areas would be.
- Coalescence of settlements.
- If Hemel is not included, this is not spread evenly.
- Kings Langley in a no win situation.

- Too far below the locally assessed need of 756dpa. It won't deliver housing need in the borough. This only represents 40%. The real number should be larger than 1,100.
- The map does not show the number of dwellings per site already, so a layperson can't get a great idea of how much the population/homes will grow by.
- This would overcrowd village schools, as the population would increase but not enough for the provision of a completely new school.
- No health care aspirations, Dacorum Elderly care has been omitted from the vision. We also have no urgent care (A&E) facility, and MIU is not open at night.
- Massive overdevelopment of Berkhamsted.
- Impact on Watford General Hospital (to facilitate all extra residents of the development. Watford General's current CQC result is requires improvement.
- This will overload the road network, which can't be extended. Need to factor in building places to park.
- The least sustainable option.
- This option will cause even more of a shortfall in Hemel.
- Chilterns AONB at Tring (site Tr-h4) and Berkhamsted (site Be-h8) which the NPPF para 116 states should be refused except in exceptional circumstances and where it can be demonstrated it is in the public interest. Will cause permanent damage to an AONB.
- This doesn't plan for enough homes.

BRAG – this represents massive overdevelopment of Berkhamsted. Latest Authority Monitoring Report reveals that in the first 5 years (2006-11) of the CS Berkhamsted delivered 10 years worth of new housing stock and by 2016 the rate of development had exceeded Core Strategy targets by 34%. All this without any improvements in infrastructure. Compare this to the rest of the Borough. Tring have done their bit (5% above target rate), while small villages and countryside locations have also hit targets. However, this is in stark contrast to Hemel Hempstead, which is where the Inspector agreed was the correct place to focus development, but development was 21% below the target figure. Therefore, the shortfall DBC claim we need to pick up in the new plan, comes from failure to concentrate on the Hemel development. The reason the rate of build in Berkhamsted is so high is a simple function of demand from the developers who generate the highest profit margins building in Berkhamsted. This demand is not a reason to focus even more development on Berkhamsted; policy cannot lead to Green Belt boundary changes.

Premier Property Acquisition - For the reasons set out in our answer to Q33, we believe that any variant on Growth Option 1 should be rejected. If the Council decides to proceed with Option 1 in any event, then Option 1C would be favoured in that it would allow some development at Berkhamsted. However this is not enough.

Tring in Transition - No. It is not based on objective evidence (as required by the NPPF).

St William Homes LLP - Growth option 1 would fail to meet DBC's locally assessed need and thus fails to accord with paragraph 47 of the NPPF and fundamentally contradicts current and emerging Government policy on housing delivery.

Gleeson Developments Limited - Option 1C relates to a level of housing growth that is substantially below OAN, and therefore Option 1 generally should be rejected. We support the fact that Option 1C does not ignore the housing needs of the three larger villages – even in scenarios that seek to accommodate the majority of development at the three main towns. It is inappropriate to make no provision at the larger villages, to sustain their growth and provide for local needs (including affordable housing needs) arising from those larger villages.

The Crown Estate - This is the least appropriate and sustainable of the three variants of Option 1 since it diverts greenfield development away from the main town of Hemel Hempstead. In addition, a housing provision of 602 homes per year would fail to meet the housing needs of the Borough. This option proposes a lower level of housing than either the latest SHMA or the Government's Housing Needs Assessment for Dacorum after September 2018. As such, it would be both unsound and result in the diversion of housing need to adjoining Districts.

Plato Property Investments LLP - No, for the reasons given in our response to question 39.

Berkhamsted Citizens – No this would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7) see copy below Question 4

C/O Bidwells - CPUK suggest that DBC should plan for a hybrid between options 2A and 3; where a housing target of up to 1,100 dwellings per year is planned with a distribution focussing on the three main settlements.

W Lamb Ltd – For the reasons discussed in response to Question 16, the draft Government figure is not considered to be the correct starting point for setting the Council's housing target and thus none of the 'Option 1' growth options are considered appropriate.

Fairfax Classical Properties Ltd - Option 1 (13,800 units over the 2013-36 Plan period): We consider strongly that this proposal will not provide sufficient housing to meet the OAHN for the Borough

Gallagher Estates - Gallagher Estates do not consider that any of Options 1A, 1B and 1C could deliver the growth needs of the Borough. Potential consequences include: insufficient supply of homes to meet demand will further inflate house prices; those with greater incomes will be more successful in securing homes and those less well-off may become concealed households or be forced to relocate elsewhere where homes are more affordable (social and family support networks could be broken and the economy could also be impacted). a mismatch between labour force and jobs could arise that may mean that businesses locate elsewhere. These consequences are socially and economically damaging and should be avoided.

Harrow Estates plc - As set out in response to Q33 it is not considered that Option 1 will provide for the full OAN across the authority. It cannot therefore be considered to be justified or based on robust evidence. As such the level of housing growth proposed

in Option 1C will fail to deliver sufficient housing to meet the OAN for the borough. It follows, therefore, that the spatial distribution in Option 1C is flawed since it is based on an unjustified and unrealistically low housing target.

The Berkhamsted Schools Group - This is not considered to be a suitable option, because it would deprive Hemel Hempstead, the largest town in the Borough, of any new growth. However, we would support the level of growth proposed with this option for Berkhamsted.

MRAG - This would represent massive over-development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4

Question Number 42**Question Text: is option 2a your preferred option for delivering the growth needs of the borough****YES***If no, please explain your reasons, with reference to evidence where available.*

- Option 1a is the sensible option, however 2a is the next best alternative if we are expected to deliver larger growth numbers.
- 2a has merits which preserves green belt.
- This option preserves the unique character of Kings Langley and stops it merging with Hemel Hempstead or into other towns.
- This current option fulfils the minimum level of building to prevent further exacerbation of the housing crisis.
- The focus should be on achieving 40% affordable housing.
- This focuses development on the areas which have existing infrastructure to support it.
- It is most appropriate to focus on the three towns as they are sustainable locations for growth.
- Tring, Berkhamsted and Hemel have a more frequent service to Euston than Apsley and Kings Langley, and the other villages do not have train stations. Kings Langley already do not have enough services into London to meet the current population of commuters.
- Roads in the three towns are also better (quality) and are less congested. Apsley is already suffering from poor air quality due to traffic congestion.
- There is no scope to improve the roads around Kings Langley & Apsley due to the railway bridges.
- Option 2a does not involve development on the green belt around Kings Langley.
- If green belt development is necessary, it should be confined to the three towns.
- The purpose of the green belt is to prevent settlements from merging.
- This option protects small villages and allows them to retain their character.
- The large villages could not cope with any more development than this.

- Focus on 40% affordable housing, current options are minimal level of building to prevent further housing crisis
- DLP planning- 1c preferable, 2a does not evenly spread growth across the Borough and places pressure on the 3 main towns
- Option B would be better

Question Number 42

Question Text: is option 2a your preferred option for delivering the growth needs of the borough

NO

If no, please explain your reasons, with reference to evidence where available.

- Pollution
- Biodiversity
- These growth options are incompatible with the Core Strategy
- These options ignore all evidence and white papers about what matters to local people
- Should only build what Government requires
- DHA planning- believe there is greater opportunity to create sustainable development in Berkhamsted
- * number of people referring to other growth options- list in questions part, that it will be reviewed there

Promoted sites

Question Number 43

Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”

YES

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **Bovingdon Parish Council;** no comment made.
- **St William Homes;** Consider only Options 2 & 3. Adopt Option 2 until a standardised calculation of assessed housing need comes into effect leading to Option 3 taking precedence.
- **The Crown Estate;** Supports 2B as it has the greatest opportunity to support sustainable growth.
- **Majesticare Ltd;** Strongly support Options 1C, 2A, 2B, 2C & 3. Strongly support the significant expansion of Berkhamsted Town. The preferred options listed could lead to a site in Berkhamsted providing a high quality residential care facility. Spring Garden Lane is designated as green Belt, but is a sustainable location for the proposed care home.
- **Gallagher Estate;** Consider 2a to be most appropriate. There is little justification for an expansion of a significant Hemel Hempstead. Sites identified must consider how they contribute to the purposes of Green Belt, landscape sensitivity and other constraints. Concerns raised over the ability to deliver significant growth levels within competitions of one particular site with potential saturation due to limited variety of new homes built.
- Development in Bovingdon is not sustainable, especially with no evidence base such as a local infrastructure plan to justify proposed growth levels. This is the best option for Bovingdon.
- One of the best options, as it does not consider as much development on the Green Belt.
- Consider train network from Hemel Hempstead, trains are almost at capacity at rush hour.
- All options do not consider the use of brownfield sites, however this is still the favoured approach. Bovingdon airfield seems an appropriate place for development.
- Objecting to BOV-h 1, 2, 3 & 4 sites and favours 2B.

Question Number 43**Question Text: “Is Option 2B your preferred option for delivering growth needs for the Borough?”****NO**

If no, please explain what changes you would like to see and why. Where possible support your answer with reference to any evidence.

- **Little Gaddesden Parish Council**
- **Northchurch Parish Council**; no comment made.
- **Premier Property Acquisition**; Does not prefer a singular option. If proceeded however, Option 2A is the most preferred option, maximising growth opportunity at Berkhamsted.
- **Dacorum Environmental Forum Waste Group**; The table should be re-worked within the constraints to represent the lowest level of growth. See Q16 response.
- **Tring in Transition**; See response to Q42. Calculates growth in housing numbers for Tring at 1,120 new home including in the urban envelope. That means 620 homes for Tring Green Belt.
- **Grand Union Investments C/O Savills**; support adoption of growth level 2. Option 2A takes the most balanced approach to development and therefore greatest opportunity to deliver sustainable and deliverable development. Ask the Council to carefully consider focusing development on HH, which can provide risks for infrastructure delivery etc.
- **D B Land and Planning**; Option 2A – consequences area stark, seriously impeding the Plans; ability to ensure the vitality of Markyate in respect of the Framework. Option 2B the proposed focus growth on a few settlements fails to consider the impact on sustainable development. Undermines the ability for larger villages to accommodate modest growth levels. MY-3A is identified as suitable to be released from the Green Belt.
- **Chilterns Countryside Group**; Growth levels 2 & 3 are premature in terms of Government requirements.
- **Gleeson Developments Limited**; option 2B growth levels below the new standard methodology figure for Dacorum. Option 2 should be rejected in favour of Option 3. Option 2B ignores housing need for the 3 other villages in the Borough. This includes affordable housing need also. Dacorum faces a large amount of housing needs and must give a wide choice of development sites in a variety of locations.
- **The Little Cloth Rabbit**; supports GFRA.
- **Plato Property Investments LLP**; response refers to the site located to the South East of the mini dealership on London Road, Cow Roast HP22 5RE. Read along with attached appendix 1. Appropriate to spread growth evenly throughout the Borough, ensuring that growth can be sustainably located. DBC should not ignore the need for growth in smaller settlements. Refers to NPPF Para 28 in

which Councils should support economic growth in rural areas. DBC should not deprive rural areas of housing growth as this is not sustainable.

Berkhamsted Citizens; questions the improved access to Watford Heath Campus. Dacorum should improve healthcare facilities. KL-h3 a potential site for health care facilities. Development along the Grand Union Canal would undermine the linear green park running through Dacorum. DBC should respect the industrial heritage of the GUC and could compromise tourism. Watford health care facilities is not a vision for Dacorum's health facilities. Dacorum currently lacks an urgent care facility. DBC produced character area assessments for Berkhamsted and Tring and the new Local Plan proposed policies undermine and ignore these assessments.

- **Grove Fields Residents Association;** the figure of locally assessed need is too high for reasons previously outlined. 2B is rejected.
- **Guinness Partnership;** indicated following growth options for Markyate Growth Options Not GB GB 1A & 1B 200 1C 200 160 2A & 2B 200 2C 200 160 3 200 600 Keymer Cavendish.
- **Hightown Housing Association;** no.
- **C/O Bidwells**
- **W Lamb Ltd;** should be spread across the Borough ensuring all local needs are met, but with a focus in HH. There is no evidence to support how the distribution of growth figures have been determined. These numbers need to be justified. Council should pursue 800 new homes per year as a minimum. Ensure that development is focussed around public transport hubs. HH falls into Herts LEP Growth Area Forum as an identified area for growth. HH also less constrained by Chilterns AONB.
- **Fairfax Classical Properties Ltd;** The provision of 756 dpa would meet the OAHN currently identified for the Borough, and therefore this could offer a positive effect, but this is dependent on the update to the OAHN, which will take place before the Local Plan is published.
- **Waterside Way Sustainable Planning Ltd;** Option 2 most appropriate for level of growth per annum. A higher level of growth can be accommodated at Tring as it is a self contained community with necessary facilities. Growth would not have to depend on HH facilities.
- **Harrow Estates plc;** not considered that Option 2 will provide for the full OAN across the Borough. It must be justified.
- **The Berkhamsted Schools Group;** Support the level of growth for Berkhamsted in this option, should the higher government figure not be brought forward.
- **Countryside Properties;** suggest a hybrid of options 2A & 3, where 1,100 homes are delivered a year.
- **2B is disproportionate for Tring, preference is given for Option 1A.**
- Developments in Kings Langley & Shendish Manor not supported due to pollution and overall congestion of the area.
- Concerns over the impact on Watford General Hospital with extra proposed growth across the 3 main settlements.

- Concerns over wildlife, biodiversity and conservation if this growth option is brought forward. Drainage issues alongside utility provision, particularly water provision is a great concern.
- Option 2B still proposed presented growth for Berkhamsted, with a proposed growth rate of 14% if dwelling numbers are brought forward.
- Support a greater level of growth in Hemel Hempstead however growth is not needed for any other settlement, and in 2B this is presented.
- The greater expansion of Hemel Hempstead the greater the risk of urban sprawl onto smaller settlements such as Kings Langley. The proposed housing numbers for HH actually include Shendish which is a settlement of Kings Langley. The potential to merge the two settlements is not a promising concept and goes against the character of Kings Langley as a village in a rural settlement.
- Parts of Hemel Hempstead do need redeveloping, particularly the low rise shops north of Marlowes, which could be turned into flats/leisure facilities to invigorate the town.
- No need to achieve growth levels above the minimum government target.
- Maryland estate a role model for delivering affordable homes in the Borough and should be followed in future development.
- Concerns over the excess-development of Berkhamsted still.
- This option would not provide for the housing needs of the District as evidenced by the Government's standard methodology for calculating housing need. It does not accommodate any needs arising from outside the District.
- Looking at other people's responses within the portal, it appeared that NIMBYism was comprehensibly widespread e.g. Kings Langley residents supporting proposals for new-builds around Berkhamsted, HH vice versa. I appreciate that Dacorum Borough Council have targets to achieve with regards to building new homes to accommodate an ever increasing population. Residents can protest, but new builds will inevitably happen.

Question Number 44

Question Text: "Is Option 2C your preferred option for delivering the growth needs of the Borough?"

YES

If no, please explain your reasons, with reference to evidence where available.

- **Tring In Transition;** Allocation to Tring should be amended to 620 in Green Belt + 500 in its urban area.
- **St William Homes;** Only consider growth options 2 & 3. Balanced approach needed.
- **D B Land Planning;** Recommended that the 160 new dwellings in Markyate should be located in My-H1, south of Markyate, as seen in the site appraisals document.
- **Majesticare LTD;** Strongly support Options 1C, 2A, 2B, 2C & 3. Strongly support the significant expansion of Berkhamsted Town. The preferred options listed could lead to a site in Berkhamsted providing a high quality residential care facility. Spring Garden Lane is designated as green Belt, but is a sustainable location for the proposed care home.
- **W Lamb Ltd;** queries raised over how DBC calculated housing figures for each settlement. No explanation to support these numbers. DBC should be considered growth of 800 new homes a year. Hemel Hempstead should continue to be a focus for growth given it's sustainability credentials. Reference made to the Housing White Paper 2017, with HH falling within Herts LEP M1/M25 Growth Area Forum. Reinvestment in New Town's recognised in LEP Strategic Economic Plan 2017-2030. Refer Para 33 of report.
- **Whitacre Ltd;** agrees with Option 2C as it distributes growth sustainably.
- **Gallagher Estates;** Consider 2a to be most appropriate. There is little justification for an expansion of a significant Hemel Hempstead. Sties identified must consider how they contribute to the purposes of Green Belt, landscape sensitivity and other constraints. Concerns raised over the ability to deliver significant growth levels within competitions of one particular site with potential saturation due to limited variety of new homes built.
- **Audley Court LTD;** best approach for the Borough to spread growth evenly. Bank Mill Lane site to be a logical location for expansion of Berkhamsted Town.
- Extra transport provision needed in Piccots End to support growth in North HH.
- Green belt land should not be built on.
- DBC to adequately assess most suitable green belt sites for development. A shared approach seems the most fair option.
- Option 2C is the maximum growth option that Tring can accommodate, subject to significant infrastructure improvements.

Object on basis of urban sprawl from HH to KL.

Question Number 44

Question Text: "Is Option 2C your preferred option for delivering the growth needs of the Borough?"

NO

If no, please explain your reasons, with reference to evidence where available.

- **Little Gaddesden PC; no supporting comment made.**
- **Northchurch PC; no comment made.**
- **Premier Property;** Does not prefer a singular option. If proceeded however, Option 2A is the most preferred option, maximising growth opportunity at Berkhamsted.
- **Dacorum Environmental Forum Waste Group;** should show constraints on growth plans to enable further comment.
- **Chilterns Countryside Group;** growth options 2 & 3 are premature in terms of government requirements.
- **Gleeson Developments;** Option 2C relates to a level of housing growth that meets the requirements of SHMA, but perhaps not new government methodology. Growth option 3 should be considered in the Local Plan. 2C provides a balanced approach to growth. Specific reference made to proposed growth in Bovington for sites Bov H1, H2, and H3. This site preselection is not supporting the Council's sustainability appraisals, with site Bov-H4 performing best in terms of sustainability appraisal findings.
- **The Crown Estate;** least favourable of all Option 2 growth options as it disperses growth on greenfield sites along smaller settlements within the Borough. This is not sustainable.
- **The Little Cloth Rabbit;** support GFRA response to Question 46. Locally assessed housing need too high in this instance therefore option 2C is discounted.
- **Guinness Partnership;** alternative sites/additional solution the Markyate growth is as follows; 1A & 1B – 200 new homes. 1C; 200 new homes. 2A & 2B – 200 new homes. 2C 200 160 3 200 600 Keymer Cavendish. See appendix 5.
- **Plato Property;** the emerging Local Plan does not provide sufficient housing growth to support the smaller settlements in the Borough, which is not sustainable. Options 2C proposes 155 new homes in the 'Rest of the Borough' which equates to only 6.7 per year. This is less than one house per year for each of settlements that exists in the 'Rest of the Borough'.
- **Berkhamsted Citizens;** health services in Dacorum should be improved to relieve pressure on Watford Heath Campus. Utility provision, specifically water, needs major improvements in the borough.
- **Hightown Housing Association;** 'No.'
- **Countryside Property (Bidwells);** CPUK suggest that DBC should plan for a hybrid between options 2A and 3; where a housing target of up to 1,100 dwellings per year is planned with a distribution focussing on the three main settlements.

- **FairFax Acquisitions LTD**; determining housing provision for the Borough is dependent on the update of OAHN.
- **Waterside Way Sustainable Planning**; least favourable option as it loses focus on 3 main towns which are the most sustainable location for growth. Higher growth should be considered in Tring as it is a self-contained development with self-sustaining infrastructure to support growth.
- **Harrow Estates**; Growth option 2 not considered to provide total housing figures for the Borough.
- **The Berkhamsted Schools Group**; support this option for growth providing growth option 3 is not introduced.
- Concerns voiced by Bovingdon residents relating to road and sewerage infrastructure. Current drainage issues leading to flooding would be exasperated by new growth.
- Proposed growth on villages and market towns completely unnecessary.
- Concerns over how new growth on market towns and villages will have an impact on the character of the settlements. Particular concern for absorption of extra traffic at KL. Rail infrastructure in Apsley & Kings Langley cannot be improved/expanded due to rail bridge constraints, thus the two stations could not cope with the proposed levels of growth in Option 2C.
- Growth surrounding Piccott's End a particular concern given the area of Archaeological significance, historic interest, conservation and is also susceptible to flooding. Growth would also destroy the character of the hamlet.
- Queries raised over whether a unified approach to growth is being adopted, particularly between Three Rivers and St Albans District Council with DBC. Queries raised over whether housing numbers can be shared between authorities.

Question Number 45

Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”

YES

If no, please explain your reasons, with reference to evidence where available.

- **Premier Property Acquisition** – See Q33, Growth option 3 is preferred.
- **DLP Planning Ltd** – DLP supports option 3, which proposes additional growth at Bovingdon – Paragraph 2.44 of report.
- **C/O Phillips Planning Services Ltd** – (see Q16)
- **Taylor Wimpy Strategic Land** –
- **St William Homes LLP** – only growth options 2 and 3 should be considered, St William consider that a balanced approach would be to adopt growth option 2, then a calculation of housing need can be brought into effect and option 3 will take precedence.
- **Gleeson Developments Ltd** – provides the right number of homes, and generally represents the starting point for a proportionate and logical distribution across the settlements. the scale of growth at the larger villages seem to be determined in these options by pre-selecting sites, rather than the more appropriate approach of looking at the appropriate scale of development for the village first, and then assessing the suitability of sites to meet that scale of development. Kings Langley and Markyate have much higher numbers than Bovingdon – not sure why.
- **Kier Property** – agree with using governments upper figure. Believes Hemel should be the focus for growth as it’s the most sustainable location.
- **Plato Property Investments Ltd** – preferred option for delivering the growth needs of the Borough. It is based on the provision of 1100 dwellings per year, which is the full-proposed new government method of calculating housing need.
- **Majesticare** – strongly support options 1C, 2A-C and option 3 proposed in the Issues and Options consultation paper (2017). All of these 4 options identify significant numbers of homes in the Green Belt homes to be developed in Berkhamsted
- **Audley Court Ltd** – strongly support options 1C, 2A-C and option 3 proposed in the Issues and Options consultation paper (2017). All of these 4 options favour the significant expansion of Berkhamsted as a town, and also these 4 options identify significant numbers of homes in the Green Belt homes to be developed in Berkhamsted.
- **Hightown Housing Association** – supports option 3
- **Silversaw Ltd** – Option 3 accommodates the projected needs in the new Government methodology. It also plans for the future of DBC. This option would

distribute growth across DBC, relieving the pressure on any single settlement to provide all of the required housing delivery across the plan period.

- **Countryside Properties (UK) Ltd** – CPUK suggest that DBC should plan for a hybrid between options 2A and 3; where a housing target of up to 1,100 dwellings per year is planned with a distribution focussing on the three main settlements. Necessary to plan for option 3 to be found sound.
- **Pennard Holdings** – support the progression of the new Local Plan based on the housing supply set out by Option 3. However, consider that this should be set as a ‘minima’, and should incorporate flexibility to allow for greater number of housing to be provided, if the OAHN and unmet need of other authorities combine to actually demonstrate that an even greater housing number is required. This will be the best option for delivering affordable homes.
- **Fairfax Acquisitions Ltd** - The provision of 1,000-1,100 dpa would provide additional affordable housing, which represents a significant positive effect. We agree that this Option would be able to closely meet the Borough’s needs for affordable housing. The most sustainable option.
- **Milbank Land** – the current target (430dpa) is not fit for purpose and falls significantly short of meeting local housing needs as acknowledged by the Council by undertaking to review the Local Plan. The Council should undertake a review of all sites put forward for development and consider their potential. This should include all sites proposed as part of the 2017 call for sites process including the Land at Bulbourne Road. Green Belt and other designations should not be viewed as absolute constraints to development, particularly given that 77% of the local authority land area is covered by an environmental designation
- **Gallagher Estates** – It is notable that the Council has not split Option 3 into sub-options exploring various degrees of avoiding the expansion of existing settlements. As already expressed elsewhere in this submission, in our view, growth will need to be accommodated at a range of sites of different sizes and descriptions in a variety of locations. All areas should be considered for sustainable development that meets local demands
- **Crest Nicholson** – Section 3.0 of the Land at Blegberry Gardens, Berkhamsted (Site Be-h6) - Representations to Dacorum’s New Local Plan: Issues and Options (Nov 2017) document by Lichfield’s on behalf of Crest Nicholson Chiltern. The principle of the draft CLG Housing Figure (or a slightly higher one) and focussing development in the three towns is appropriate.
- **Harrow Estates Plc** – In combination, therefore, Harrow Estates give qualified support to spatial Option 2A, while also strongly advocating that the council explores opportunities to increase the scale of housing growth in accordance with growth Option 3, as the local plan should follow a spatial pattern of growth that directs the majority of new housing to the three larger settlements. Turley Local Needs Assessment for Tring confirms that Option 3 will provide for the scale of housing required. Housing in the three largest settlements is the most sustainable as the homes will be closest to existing services.

- **The Berkhamsted Schools Group** - It distributes the housing growth amongst the largest settlements in the Borough, and would provide 2,250 new dwellings in Berkhamsted which would best meet the housing need.

-

Comment ID-4764299-QUESTION-45 is included in the supporting, as this is the option that was selected, however they clearly stated their objection to option 3 – “As a resident of Kings Langley I would like to register my objection to the proposed Option 2/3/C”

Comment ID-4764299-QUESTION-45 45 is included in the supporting, as this is the option that was selected, however they clearly stated their objection to option 3 - I object to the proposed development on Green Belt in around Kings Langley because: Options two + three would infill the area.

Comment ID-4764299-QUESTION-45 is included in the supporting, as this is the option that was selected, however they clearly stated their objection to option 3 - I object to the proposed development on the Green Belt in around Kings Langley because: The whole ethos of the village would be lost if we accept Local Plan 2, 3, B and C.

- This is in line with the new standard methodology for calculating housing need.
- It includes the highest level of growth for the settlements in the ‘Rest of the Borough’ in terms of both absolute number of dwellings and the proportion of dwellings (5% of total housing).
- The Landowners suggest that DBC should plan for a hybrid between options 2A and 3; where a housing target of up to 1,100 dwellings per year is planned with a distribution focussing on the three main settlements, also with a level of growth at larger villages to support sustainable growth.
- Due to “total absence” of any mitigating measures at any of the sites proposed, they can only support proposed build options 1B, 2B and 3B i.e. no new homes in Bovingdon over and above the 90 sites already identified.

Question Number 45

Question Text: “Is Option 2C your preferred option for delivering the growth needs of the Borough?”

NO

If no, please explain your reasons, with reference to evidence where available.

BRAG: development in Berkhamsted “has to be balanced against the need to protect the town’s historic character and setting” and the excessive growth in Berkhamsted proposed in this option does not do this. Central Government’s policy on Green Belt is clear – “demand for housing alone will not change Green Belt boundaries”. Also Berkhamsted has already delivered above target, and this is due to developers achieving the most profit. This is not significant enough demand to change GB boundaries and allocate more development to Berkhamsted.

Tring in Transition - this option is based on the fundamentally flawed formula. That is because the proposed approach is based on median house prices where people work, i.e. for the large percentage of Dacorum commuters, this means London where house prices are far higher than in Dacorum. The proposed formula would inflate house building requirements substantially above the level justified by evidence/projected population growth. The formula should instead be based on the median house price in the area where people live.

DB Land & Planning - DBLP remain neutral on the largest allocation of housing for the Borough and consider that this requires a significant step change in the role and function of Markyate. Additional development at Markyate raises questions about major development in the AONB and there being an exceptional circumstances and public interest test. Now, it is considered that the Draft Local Plan is not in a position to present a coherent strategy justifying such an approach

Chilterns Countryside Group - believe the figures for growth given for Options 2 and 3 to be premature in terms of Government requirements.

The Crown Estate - Whilst The Crown Estate supports the Government’s policy to significantly increase home building, it is doubted that Option 3 (1,100 homes per year) is either physically achievable or deliverable in market terms.

The Guinness Partnership - Growth Options for Markyate An alternative or additional solution is described on the following pages to give effect to the growth options for Markyate, namely Appendix attached to Q46 - LPIO17659.

Berkhamsted Citizens – This would represent massive over development of Berkhamsted and is contrary to the objectives, policies and local aspirations set out in Section 4 (see Q4 to 7)

Grove Fields Residents Association - Option 3 is unproven, untested and not established at this time and therefore given the significant discussion and review that

is going to be had with regard to the validity and viable nature of the higher calculation, the consideration of the option at this time should be discounted.

St Albans Diocesan Board of Finance – SADBFB suggest that DBC should plan for a hybrid between options 2A and 3, where a housing target of up to 1,100 dwellings per year is planned with a distribution focusing on the three main settlements. SADBFB suggests it is necessary to plan for scenario 3 to ensure the Plan that is produced will be sound and pass through examination by Inspector

W Lamb Ltd – due to the reasons discussed in response to Question 16, the draft upper Government figure is not considered the correct starting point for setting the housing target and thus Growth Option 3 is not considered appropriate/relevant.

- The level of proposed development is completely unsustainable due to the strains on the roads and public transport.
- Option 3 described as horrendous, and as a travesty due to the destruction of villages and green belt.
- This will ruin the character of villages and potentially blur their boundaries.
- If this figure is promoted a new town will need to be considered.
- Option 3 would be making a detrimental impact on the environment by not protecting out green land and the green belt.
- This does not protect the green belt.
- There is no evidence that this level of growth is needed in Dacorum.
- There is no proof of this housing need in Dacorum – only from central government.
- This figure is inappropriate as there isn't appropriate land to accommodate this growth.
- This would impact quality of life due to increased pollution, congestion and overcrowding.
- This would create a loss of community identity.
- There is no outline on how to protect the natural and historic environment of the borough.
- Dacorum falls within the London commuter belt, served by the west-coast mainline rail corridor, which is already at full capacity at the peak. Doubling the population means this stretched service will suffer.
- Wayside Farm is an extensively used site, both in terms of its status as a viable, profitable business and as an important area for biodiversity and recreation.
- The roads are full already. Even the new town's (Hemel) roads were not built to cope with this growth.
- Impact on Watford General Hospital (to facilitate all extra residents of the development. Watford General's current CQC result is requires improvement, this can only get worse with all the extra patients it will incur as a result of these developments).
- Hemel Hospital needs massively updating before this option is considered, in order to make the area healthy.
- Drainage issues that will happen as a result of fields and woodland being destroyed.
- the use of concrete, a non-permeable material – will create more surface run off and increase likelihoods of flooding. Also destroying woodland means evapotranspiration will decrease, again leading to more surface run off.

- The report highlights the need to 'ensure that new and existing developments have regard to the settlement patterns' which option 3 has no regard for.
- It highlights a key issue that there is already a problem within Hertfordshire to keep up with domestic waste disposal and demands, already relying heavily on 'transporting this to sites in Buckinghamshire & Oxfordshire', which is already unsustainable. This is due to distance travelled to heavy vehicle traffic, air pollution, impact on communities on route to disposal points, the magnitude of this impact will increase greatly with the proposed level of development in option 3.
- It isn't responsible to use this option as the only pressure is from central government, with no regard to local circumstances.
- How will health facilities be provided with the NHS crisis?
- the Council would fail to meet its statutory duties, e.g. education at secondary level.
- There should be no development on Wayside Farm KL-h3 which is a working farm that provides food and employment. It is also a community and educational asset. DBC should protect this site.
- Impact on Watford General Hospital - we cannot put a price or value on this - next Hospital is Stoke Mandeville in Aylesbury.
- Gradual growth is to be expected, especially when housing is so desperately needed, and planning for the future is sensible; but I am greatly concerned about the borough's ability to sustain such a sudden expansion as this.
- Existing infrastructure needs help first.
- Encourages the building of only high density housing to increase numbers such as blocks of flats.
- Building without parking creates ugliness where people park on the pavement. No parking blocks roads for ambulances etc.
- Wait for a doctor's appointment, and the closure of 24 hour MIU at Hemel putting pressure on Watford A&E. this will only get worse with an ageing population, and this plan for growth will exacerbate the issues.
- No clear arguments presented justifying option 3.
- Too much development of large villages.
- Tring high street is very narrow and has very narrow pavements and side roads. Could not cope with 3000 more homes.
- Would be more sustainable to improve the infrastructure of market towns and large villages before allocating this development.
- More social housing is needed.
- Too much pressure on Dacorum's public services.
- No plans for health service provision. Especially elderly care.
- No justification or "exceptional circumstance" on releasing this much green belt.
- The loss of Wayside Farm at Kings Langley which has one of only 2 jersey dairy herds in Hertfordshire and provides a local service of fresh milk and also meat for the local butcher as well as an educational experience for local children.
- Disagree that the Watford Health Campus is an appropriate/adequate 'vision' for the health care aspirations of Dacorum. Elderly care has been omitted from the vision. We also have no urgent care facility. It has long been accepted that we need a new hospital for this area.

- Simply meeting government requirements at the detriment of the borough and it's character.
- The borough is full.
- Tring to be allocated 26% more houses than Berkhamsted (a much larger town) is grossly inequitable.
- New homes should be nearer the Maylands as this reduces the need to commute (residents being near where employment can be found).
- In Chipperfield there is land available for development so it seems entirely appropriate to require Chipperfield to provide 100 dwellings
- The figures contained in this document do not state the current number of houses in each of the sites so that someone who is not an expert can assess the relative impact, of each of the options.
- The impacts have not been considered, a more holistic approach needs to be taken.
- No long term vision of how this development will affect the borough.
- Ivy house lane field should not be developed on. (Berkhamsted).
- Water supply issues will be made worse.
- As there is no explanation on the impact or the reasoning behind this, those commenting only have bias on where they live as to justify why they don't agree with development.
- Issues with roads flooding and in the cold freezing. Concrete and other urbanisation will increase this.
- A huge disproportionate jump in development, not allowing time for infrastructure to accommodate this.
- All existing farmland and high quality green belt should be preserved.
- Unrealistic as the borough has never delivered this kind of number.
- This kind of figure requires new town planning.
- This is contrary to DBC objectives of protecting the natural and historic environment.
- Substantial loss of habitats.
- This option is bad for wellbeing as building more homes without infrastructure leads to urban problems.
- Option 3 puts too much pressure on Hemel Hempstead. It would affect the nature of Hemel as a town – home built will be for commuters and local people will be forced out as prices rise.
- Pollution will be a large problem, especially in Hemel and the market towns.
- Appeared that NIMBYism (Not in My Back Yard) was comprehensibly widespread e.g. Hemel Hempstead taking the whole hit of development. Dacorum Borough Council have targets to achieve concerning building new homes to accommodate an ever-increasing population. New-builds will inevitably happen
- Does not state the current number of houses in each of the sites so that someone who is not an expert can assess the impact of each of the options.
- Destruction of woodland.
- Won't be enough people in one area to build new schools, existing ones will be more overstretched. Therefore consider building a new settlement with schools to accommodate the growth level in option 3.
- Exporting to another council should not be written out as the constraints of the borough cannot accommodate option 3.

- The Government is not forcing the Council to allow the higher amounts of development, and what the Council is considering is not necessary.

Summary

The purpose of the issues and options consultation was to understand the areas that were of most concern to residents, which will help to shape the Local Plan going forward. These points have been addressed through the more specific representations raised within the consultation as above and in questions where these issues can be better explored.

470 people answered the question of which 31 were supporting and 439 were not. Three comments (LPIO8349, LPIO14220, and LPIO14230) are stated as supporting but are clearly against (actually state in their comments that they do not support option 3),

Furthermore, only **five** of the supporting comments came from the wider community, house builders and developers presented the majority.

Question Number 46 – (Berkhamsted)

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it?

For the settlement of: Berkhamsted

If yes, please explain what alternative approach or changes to our proposed approach you would like to see and why. Where possible, support your answer with reference to any evidence.

- Sport England – Some of the allocations include sports facilities within the Playing Pitch Strategy. It is important that any allocations that include such facilities need to be protected for future use for residents. Sites include:
 - Be-h2 – Haslam Fields, Shooters Way - the site includes Berkhamsted School's Haslam Fields detached playing field. Replacing the playing fields on the school's nearby Haresfoot campus is acceptable in principle subject to the replacement facilities being equivalent or better in quantity and quality and the facilities being phased to ensure continuity of provision. Any site allocation policy for this site should require development to be subject to these criteria to accord with paragraph 74 of the NPPF.
 - In addition, a number of potential sites for new sports facility developments have been highlighted in the Council's Playing Pitch Strategy action plan including land at Durrants Lane and Shootersway, Berkhamsted for which liaison with Sport England will be required.
- Berkhamsted Town Council –
 - Concerns across all sites regarding traffic congestion, loss of green belt land, housing densities too high, cumulative effect of development on infrastructure and lack of public transport provision/ viability. Site specific concerns are:
 - Be-h1; Land south of Berkhamsted -
 - Transition area between the town and open countryside would be damaged.
 - Distance from town centre and topography encourages increased car use putting pressure on local highway network (especially Shooters Way, Kings Road and Swing Gate Lane).
 - A new primary school on this site does not fit with the existing provision for new schools in the present Plan.
 - There would be loss or damage to habitats, such as the Long Green and Brickhill Green wildlife sites.

- Density of 35 dph is too high for the edge-of-town, and is incompatible with neighbouring character areas.
- Be-h2; Haslam Fields, Shootersway –
 - Distance from town centre and topography would mean reliance on cars putting pressure on local highway network (especially Shootersway, Cross Oak Road and Kings Road)
 - The density is too high and not compatible with neighbouring character areas.
 - Loss of playing pitches with suggested replacement being even further from town centre (but see Sport England response above)
- Be-h3; Land at Ivy House Lane –
 - Loss of cultivated arable farmland.
 - Distance from town centre and topography encourages increased car use putting pressure on local highway network
 - Inadequate access to site, the Lane (and railway bridge at foot) will need substantial upgrading to provide suitable capacity. Restricted access (private road) Meadway and access from Hunters Park requires demolishing a house.
 - The density is too high given the character of neighbouring area.
 - There would be an adverse impact on the neighbouring Chilterns AONB.
 - Frequent run - off flooding onto the Lane at the base of the floor of the dry valley.
- Be-h4; Land between Durrants Lane/Bell Lane/Darr's Lane (two sites).
 - High density development would have adverse impact on the landscape and setting of the AONB.
 - Distance from town centre and topography encourages increased car use putting pressure on local highway network
 - A bus service is unlikely to be viable.
 - Parking and pollution issues at the centre of Northchurch will be exacerbated.
 - Development would exacerbate traffic problems on Shootersway (see Be-h2) and cause increased traffic on Darrs Lane and Bell Lane which are narrow, single carriageway lanes.
 - A new primary school on this site conflicts with existing Berkhamsted education planning policy.
 - Falls within an area of Archaeological significance.
- Be-h5; Land at Lockfield, New Road, Northchurch
 - Significant highway improvements needed to New Road canal bridge and pedestrian access to local facilities is narrow and results in poor pedestrian access to local facilities.

- Increased use of the junction of New Road with Northchurch High Street and this will also exacerbate existing parking difficulties in Northchurch.
 - Adverse impact on the canal side setting, undermining the objective of “protecting key historic and environmental assets such as the Grand Union Canal and the River Bulbourne ”in the Vision.
 - The site is too small to offer scope for additional town-wide leisure space.
 - Proximity to the railway line may make residents subject to noise.
 - Be-h6; Land adj. to Blegberry Gardens, Shootersway
 - Negative impact on transition area between the town and open countryside and on adjacent AONB.
 - Distance from town centre and topography would mean reliance on cars putting pressure on local highway network (especially Shootersway – see Be-h2 above)
 - No adequate public transport.
 - The site is too small to offer viable scope for additional town-wide leisure space.
 - It is a site of archaeological significance.
 - Be-h7; Land at Bank Mill Lane - Flood risk.
 - This site lies within the Berkhamsted Conservation Area and a major expansion of the town to the east would significantly alter the Gateway to Berkhamsted.
 - Impact on the setting of the River Bulbourne and of the adjacent Chilterns AONB.
 - Intrusion into the Green Belt, and reducing the separation between the town and Bourne End.
 - Distance from town centre and limited local facilities would mean reliance on cars putting pressure on local highway network (especially Swing Gate Lane roundabout)
 - Density is too high for the neighbouring Character Area.
 - Be-h8; Berkhamsted Golf Range, The Brickworks, Spring Garden Lane
 - Poor road access and distance from town centre and topography would mean reliance on cars putting pressure on local highway network (especially Shootersway)
 - A high- density development on a valley side in the Chilterns AONB would have an adverse impact on the landscape.
 - This site is far from the immediate urban edge and would extend the town further into countryside.
- Chiltern Society –

- 3 of the sites (h4, h5.h6) were not recommended in the earlier Stage 2 Green Belt Study, and h8 is not recommended for further consideration in this appraisal.
 - Be h1 land south of Berkhamsted Due to the size of the total of plots (970) units this effectively would create a new “village” and would require its own facilities as it is some distance from the main town
 - BE h2 Haslam Fields, Shootersway Proposal would mean loss of greenfield land and school playing field. Transport links should be provided as it is on a steep slope making walking and cycling into main facilities difficult.
 - Be h3 land at Ivy House Lane Concern about impact on adjacent AONB land.
 - Be h4 land between Durrants/Bell/Darrs Lanes This site was not identified for further assessment in Stage 2 Green Belt Review, so there needs to be compelling case for a change to provide approx. 200 houses. Concerns about traffic capacity on Bell Lane and Darrs Lane, and to a lesser extent, Durrants Lane to support what is already a crowded network, and the resultant strain onto a busy Northchurch High Street
 - Be h5 Lockfield, New Road, Northchurch. This site was not identified for further assessment in earlier study. The impact on the Grand Union Canal and the adjoining AONB will need careful mitigation. Need for access improvement for traffic movements onto New Road.
 - Be h6 Blegberry Gardens, Shootersway This site was not identified for further assessment in earlier study. Architectural issues. Should be a demonstrable need for this development given proposed size.
 - Be h7 Land at Bank Mill Lane Flood plain on part
 - Be h8 Golf Range The Brickworks This lies in the AONB and has not been recommended in current assessment. Located far from the town centre and better access would need to be provided
- Chiltern Conservation Board
 - Objects to the allocation of site Be-h8 (Golf Range) in the AONB makes a holding objection to all the sites in the setting of the Chilterns AONB, pending proper assessment of the impact of developing the sites on the AONB being Be-h3, Be-h4, Be-h5, Be-h7 and Be-h8
 - Landscape is a late add-on to the Arup Green Belt study, and shows little understanding of AONB impacts. There is not even a map showing the AONB boundary in the Arup work. The landscape work is not detailed enough.
 - The Schedule of Site Appraisals Sustainability Appraisal Working Note is flawed because being in the setting of the AONB has been given no greater weight than sites outside the AONB setting.
 - Location of growth should be informed by sustainability appraisal and assessment of the cumulative effects on development on the Chilterns AONB, including effects on natural beauty, ecology, habitat fragmentation, air quality, tranquillity, water abstraction from chalk streams, visitor pressure etc.
 - Northchurch Parish Council –

- Be-h4
 - Adverse impact on the landscape and setting of the AONB.
 - Increases in car usage, increase in congestion and pollution in the AQMA.
 - Substantial increase in traffic on Shooters Way. Difficulties of upgrading Darrs Lane and Bell Lane without detrimental environmental effects.
 - No bus services
 - Area of archaeological significance
 - Size of development will change character of area

- Be-h5
 - Being used as a service yard for Network Rail, it is almost a brown field site.
 - Northchurch Parish Council would consider developments on this site if suitable traffic calming / traffic safety measures were introduced onto New road / canal bridge and Northchurch High street.
 - New Road will need to be upgraded before development is started.

- Be-h8
 - Poor road access would create increased traffic on Shooters Way and Darrs Lane.
 - No bus services
 - Impact on local landscape which is in AONB area.

- Herts CC
 - General –
 - Transport - Lack of bus service and viability issues for creating new / diverting services affect all sites except h7. Would not support development at sites h2, h6, h8 and part h1 (by BFI)
 - Ecology – All sites require further work to assess impacts

 - Be-h1
 - TARS - Requires significant new infrastructure provision. Significant enhancements to an existing diverted or new bus service would be needed. We would not be in support of development of the part of the site close to the BFI building - is remote from existing bus services, difficult to serve and unlikely to be viable to support a new service.
 - Ecology - Loss of agricultural ecology and potential impact on WS is locally negative on this aspect and should be reflected thus, although this may not be significant to other aspects of the development as a whole

- Be-h2
 - TARS - We would not support development at this site – is remote from existing bus services, difficult to serve and unlikely to be viable to support a new service.
 - Ecology - Loss of grassland ecology is locally negative and should be reflected thus, although this may not be significant

- Be-h3
 - TARS - Nearest bus stop is over 400m away and bus services limited. Topography and lack of footway on some of the roads to the rail station would discourage walking to / from it.
 - Ecology - Could be a neutral impact. The SAC issue is an additional consideration

- Be – h4
 - TARS - Part of both these sites would be within 400m of bus stops but only has limited services. The potential for bus services to be diverted to either site limited by the suitability of roads for bus operation
 - Ecology - No obvious fundamental ecological constraint in respect of recognised value known within the site. Country Park proposal welcomed but not credible given availability of undeveloped land and small size.

- Be – h5
 - TARS -The closest bus stops on New Road south of the site are within 400m but have only limited bus service. Some of the site would be within 400m of bus stops on the A4251 which are better served. There are opportunities for use of the canal towpath for pedestrians
 - Ecology - No obvious fundamental ecological constraint. Likely limited intrinsic interest but locally significant loss of habitat resource. Biodiversity Offsetting contribution should be sought as well as contribution to SANG given location of development

- Be-h6
 - TARS - We would not support development of this site. This site is remote from existing bus services, would be difficult to serve.
 - Ecology - No obvious fundamental ecological constraint in respect of recognised value known within the site

- Be – h7
 - TARS - It is likely that all of the site will be within 400m of bus stops on London Road with regular bus services available. Pedestrian and cycle route to town centre is relatively level.

- Ecology - No obvious fundamental ecological constraint in respect of recognised value known within the site but loss of river corridor meadow habitat damaging. Contribution to Biodiversity Offsetting should be sought and SANG given location. Local environmental enhancement would depend upon extent of site developed – 8m buffer each side of Bulbourne is essential
 - Be-h8
 - TARS - This is remote from existing bus services and would be difficult to serve. We would not support residential development on this site
 - Ecology - Local ancient woodland already degraded by motorsports activities but needs to be considered. Options for biodiversity / landscaping enhancements if not all site developed.
- Thames Water –
 - Applicable to all sites - the wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development
 - Further site specific comments
 - Be-h1 Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development.
 - Be-h5 There may be existing public sewers crossing the site. Diversion of sewer or building over sewer agreement may be required.

General Comments (Not statutory consultee)

- The very low densities are not acceptable. Not acceptable to keep building on green field land and allow low density housing in its place.
- Why accept such low densities when historic patterns of development and recent good practice guidance demonstrate the importance and effectiveness of higher density development? CABE, 'Better Neighbourhoods: Making higher densities work', addresses how to increase the supply of homes in areas of high demand, and in particular how to build at higher densities without sacrificing quality.
- Some development will be infilling in an historic town – so should be hitting at least 80dph. Minimum density for a tram service is 60dph, surely this is what we should be aiming for? 25 dph is the minimum density for a bus service, A sustainable urban density is considered to be 69 dph. This is what we should be

aiming for as a minimum.

- Young local people are being priced out. By providing smaller homes and flats in a higher density development you are more likely to be providing homes that local people can actually afford rather than simply turning Berkhamsted into yet another banker belt development of high commuting.
- Higher density mixed housing development allow for the creation of well-balanced mixed communities. Research by the London School of Economics in 2004 shows that higher density can bring benefits.
- Traffic fumes are a huge problem in Berkhamsted and it is getting increasingly worse.
- Berkhamsted has already delivered double the number of homes on the 2006 plan
- Current plan does not take into account cumulative effect of development

Site Specific Non-Statutory Consultee Comments

- Be-h1 Land south of Berkhamsted
 - The proposed principles of this development are sensible – creating a mixed use development with community services and facilities. Proposals to create set up a trust to manage woodland and common areas are welcomed. I sincerely hope none of the woodland is removed as part of this development. I strongly feel the eastern parts of the site are by far the most suitable for development.
 - New access routes could be created to the east of the town to provide access to the new development without disturbing existing properties.
 - The most westerly parcel of land is not suitable for development. It is isolated from other development and given that Shooters Way and Kings Hill Way are already congested, and will be even more so given once the new development to the west is complete, Higher densities in the eastern part of the site would solve this problem and mean there would not be a need to develop the western parcel of land.
 - As a minimum the site should be aiming to be achieving densities the same as Woodlands Avenue, but really should be looking to recreate the feel of the older parts of the town.
 - Would remove arable land
 - Density of 35dph is too high and loss of green belt would cause urban sprawl.
If Berkhamsted is forced to build 900 new units or more this is probably the

best site

- Be-h2 Haslam Fields, Shootersway
 - I feel this is a completely unsuitable site. 26 dph is a total waste of greenfield land. Habitats will not be able to thrive next to the noise and traffic fumes on the A41 and wildlife will simply be run over!
 - Shootersway is already hugely congested. Cross Oak Road has only part pedestrian pavement and is single track in parts.
 - Since the school no longer wants these playing fields and they are not surrounded by other housing this would seem a reasonable option for development if essential
 - I am writing to support the use of Haslam Fields, Berkhamsted Be-h2 as a potential site for housing – much support from parents of pupils at Berkhamsted school for this development
- Be-h3 Land at Ivy House Lane
 - My main concern with this development is the low density proposed and need for screening as well as the creation of a new defensible boundary to the AONB. Given the low density development pattern in the surrounding area I struggle to see how this development would provide any affordable housing or units of a price more affordable to younger people.
 - Applicable policies have not been or have been insufficiently taken into account in the preparation of the site appraisal and Working Note.
 - The site is a green belt buffer between Berkhamsted and the AONB and should not be built upon
 - Site is difficult to access, narrow steep road, railbridge at foot imposes serious constraints, no bus service and given its distance from town centre and topography cars will be the predominant mode of transport.
 - Sustainability Conclusion in the site Appraisal identifies issues which make one ask how the Site has made it as far as the Schedule of Site Appraisals.
 - Concerns over access through private roads on Meadway estate and impact on Gravel Path already identifies as having safety issues in Berkhamsted UTP.
 - Issues with access, water supply and drainage issues. The site is accessed only by single track country lanes which would require the

building of pavements and lighting

- Be-h4 Land between Durrants Lane / Darrs Lane / Bell Lane
 - A proposed density of 21.9dph is too low, a waste of greenfield land. If the northern extent of the site is constrained by topography this would mean a more isolated area of development to the south with a high likelihood that people would then use the private car to access the town and other areas.
 - Low cost housing for Hospice staff is hugely supported. I think it would also be sensible for some accommodation to be provided for those families who have relatives in the hospice and cannot travel to with them when needed.
 - Development would increase the urban sprawl and ruin views to and from the Ashridge Estate AONB
 - Site and topography would make car use predominant adding to congestion and affecting Northchurch AQMA.
 - Site of archaeological significance – Grims Ditch
 - There is a fundamental issue with considering these two spaces as a single site. They have different characteristics and considering them as one could misrepresent the amount of housing which could be delivered.
 - Site is bounded by single track roads and Shootersway is already suffering from high traffic volumes.
- Be-h5
 - Cala Homes (the developer) supports allocation of this site
 - Access from New Road which is a narrow road with limited pedestrian access.
 - Disagree with building in Greenbelt except site Be-h5
- Be-h6 Land adj. to Blegberry Gardens, Shootersway
 - This is potentially quite an isolated site away from the main part of the town. Site too small to support its own community facilities, and given the location, people are likely to travel by car adding to congestion and pollution.
 - Shooters Way, Cross Oak, Road and Kingshill Way are already at capacity and are likely to see significant increases in traffic by exiting new developments.

- Site is opposite the Bearoc Park development which has already severely depleted local water pressure and sewerage capacity and greatly increased the number of vehicles using the residential Shootersway
- Be-h8 Berkhamsted Golf Range, The Brickworks, Spring Garden Lane
 - The isolated nature of the development will mean more people travelling by private car to get to town. The nursery would generate a considerable amount of traffic through already congested routes.
 - Loss of Green Belt and Grade 3 agricultural land
 - Since Berkhamsted is short of accommodation for the elderly, this would be a lovely setting for a care home. It would be good if the housing were affordable and available for care workers

Question Number 46 - Bovington

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

General concerns raised included:

- Flooding issues, around Green Lane / High Street area
- Exacerbation of traffic congestion and parking issues, especially in High Street area
- Current infrastructure already very stretched
- Building in the Green belt and urban sprawl
- The development of the sites should be considered with other land to provide links between Box Lane, Chesham Road and Chipperfield Road to divert road traffic around the existing settlement and remove through traffic from the High Street.
- The parcels of land assessed in the Stage 2 Green Belt study are far larger than this site. This results in the Green Belt study drawing conclusions relating to broad land parcels that are not necessarily accurate or specific to this site. It is essential therefore that the matter of whether a site passes or fails to pass the Stage 2 Green Belt study is not a determinative factor in site selection, where the Stage 2 Green Belt study has in affected assessed the wrong parcel of land (Gleeson Developments – in response to site Bov-h4)
- the new Green Belt boundary should be revised as shown in the ARUP Green Belt Review plan (their Ref No BV-A6) (Whiteacre)

General Site Specific Issues

Bov – h1 Land at Grange Farm , Green Lane

- .Green Lane prone to flooding especially towards High Street
- Site could now be developed at a density no longer artificially limited to just 130 new homes. We have prepared indicative masterplans showing that between 200 and 250 new homes could be provided at Grange Farm (Whiteacre)
- Site is of sufficient size to be able to address residents infrastructure concerns, providing new facilities, not only providing the infrastructure required for the proposed new homes, but also to make a tangible contribution to overcoming existing infrastructure deficits. (Whiteacre)
- Site would not impact on High Street congestion & relocating the school (partially or wholly) to this site would help alleviate current High Street congestion. (Whiteacre)

Bov – h2 Land South East of Homefield

- Access from site on to Green Lane frequently commented on as being problematic

Bov-h3 Land r/o Green Lane / Louise Walk

- Access from site on to Green Lane frequently commented on as being problematic
- Green Lane prone to flooding around Louise Walk / High Street
- Flaunden PC concerned that adding to congestion in Green Lane area may have detrimental effect on Flaunden residents access to local towns.

Bov-h4 Land at Duckhall Farm, Newhouse Road

- This site is the only development option at Bovingdon which does not physically extend the built up area beyond the current natural boundaries of the village. (Gleeson Developments)
- etc.
- Site size has been reduced since it was previously promoted in the green belt review with proposed allocation at the eastern side of the site- to be assessed separately.
- The parcels of land assessed in the Stage 2 Green Belt study are far larger than this site. This results in the Green Belt study drawing conclusions relating to broad land parcels that are not necessarily accurate or specific to this site. It is essential therefore that the matter of whether a site passes or fails to pass the Stage 2 Green Belt study is not a determinative factor in site selection, where the Stage 2 Green Belt study has in affected assessed the wrong parcel of land

Statutory consultees

- Sports England- some of the allocations include sports facilities within the Playing Pitch Strategy and that it is important that any allocations that include such facilities need to be protected for future use for residents. Bov-h3 includes Bovingdon Football Club which is highlighted in the PPS as being overplayed and Bovingdon and Flaunden Tennis Club which is seeking to expand use by introducing floodlighting to the courts.
- Flaunden Parish Council - is particularly concerned that development in the Bovingdon and Kings Langley areas would be detrimental to the current levels of access to the surrounding towns of Hemel Hempstead and Chesham There would be a risk that Flaunden could become cut off due to the resultant congestion on what are narrow and already very congested roads, particularly in the Green Lane /Shantock Hall Lane area of Bovingdon..
- Bovingdon Parish Council- concerned about the impact that development would have on Bovingdon infrastructure which is perceived as being already

very stretched, issues highlighted include traffic congestion (especially in High Street), parking. B4505 recognised as being busiest B road in the County and will be further exacerbated by Chiltern DC's development proposals for Chesham which may significantly further increase traffic volumes on the B4505 through Bovington. Schools and GP surgeries are at or very near to capacity. Surface water flooding is an issue which will be exacerbated by more run off from newly created hard surface development. Deficit in leisure / community facilities would also have to be addressed. Local plan does not address the infrastructure issues raised.

- Chiltern Society – already stretched health and education facilities would need to be improved to accommodate proposed development. Site Bov-h1 would be remote from existing village facilities. High Street already congested and measures would be required to alleviate congestion. Concerns over southward expansion into open countryside (sites Bov-h1 and Bov-h2). Part of Bov-h3 considered to be unacceptable intrusion into open countryside.
- Thames Water Utilities state that there will be a need to improvements to the waste water/ drainage infrastructure on the allocated site in all Bovington sites. Request that developers work with Thames Water and that a drainage strategy is included as part of the planning application process. Furthermore, for Bov-h2 the total development identified in the sewerage catchment draining to Church Street SPS within the Dacorum development plan would cause concern if all developments were to go ahead. No concerns with the foul drainage network for Bov-h4 although may be concerns on cumulative effect if all development sites were to proceed.
- Hertfordshire County Council- some overlap with the Minerals Local Plan-consultation with county to decide whether the applicant will need to extract minerals prior to development. Work with the archaeological team in assessing sites. Transport provision - all sites within reasonable distance of bus services but concern at relative infrequency of service (hourly) and for Bov-h1 exceptionally not noted as being within walking or cycling distance of centre and bus service frequency unlikely to encourage patronage of bus service and site size unlikely to make meaningful contribution to improved services. Herts Ecology further assessment is needed on all of the sites.
- Chipperfield Parish Council states the increase in traffic due to proposed developments in Kings Langley and Bovington will certainly have an impact on our community. Journey times of residents travelling to towns is very likely to be increased. Speeding has always been an issue in the village and this could well increase with the traffic using Chipperfield as a cut through to the Towns.

Sites put forward

Option 2B put forward by Bovingdon Parish Council as Bovingdon does not have infrastructure to accept any additional housing

Bovingdon airfield suggested as alternative development site by a number of residents (30 responses).

Question Number 46 Hemel Hempstead

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Hemel Hempstead

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

- Objection towards building on the Greenbelt and damaging character of smaller settlements.
- Points raised that some areas have already had large increases in the population housing numbers, which have not been considered.
- Option 1A should be the only option
- Healthcare provision not catered for
- Arguments that village locations cannot cater for growth, which is suggested within the issues and options.
- Why isn't brownfield considered more
- Some support for more even spread across the borough, claims that currently villages have seen the greatest levels of development and could make better use of the more northern parts of the borough.
- Green space in the urban environment
- Employment etc Core Strategy CS1 development of all kinds should be in keeping with the area (scale)
- Chiltern Countryside Group. – release of greenbelt is not necessary to ensure infrastructure provision, Hemel Hempstead much better suited for growth than other settlements in Dacorum
- Visual damage raised at all of the sites, HH-h1a and h1b damage from the road and the other side of Hemel Hempstead, and HH-h3 would damage views from the east side of Hemel Hempstead.
- Need for more infrastructure in Hemel Hempstead
- Building height concern

HH-h1a North Hemel Hempstead (Phase 1)

- Concern of damage/ removal of ancient woodland in the area and SAC. Benefit does not outweigh the harm.
- Concern of flooding, loss of recreational facilities and views for Piccotts End residents, conservation area and area of archaeological significance and heritage significance.
- Loss of recreational space for community, public footpath, wildlife and ecology loss- including the river Gade which is of special interest/ rare.
- National Rivers Authority increase in the water demand from the river gade due to it being a chalk streams, waste water treatment for new dwellings- **not from a statutory consultee**
- Stage 2 green belt study was not identified as an area to be recommended for further assessment.

HH-h1b North Hemel Hempstead (Phase 1 and 2)

- Increasing density to allow for less land use or meet more than required housing supply, would be beneficial in meeting sustainability needs and providing for the transport services such as tram, busway etc
- Schedule of site appraisals technical studies assessments that this is excluded from further assessment and to be retained as greenbelt reinforced by the key land uses and sustainability conclusion.
- Concern of flooding, loss of recreational facilities and views for Piccotts End residents, conservation area and area of archaeological significance.
- Greenbelt, AONB, high landscape sensitivity and Chilterns Beechwood SAC, and listed buildings adjacent to the site.
- Preservation of historic and attractive environment, traffic issues already starting with diversions, flooding and lack of facilities/ utilities.
- Greenbelt land and of high grade agricultural land, severe impact on neighbouring communities (Redbourn)
- Support for this site to reduce the strain on roads/ infrastructure in the more rural/village locations
- Consideration of flood risk within the area with dry rivers, wildlife and rural access.
- Destroy Piccotts End conservation area increase in the amount of traffic through small roads in Piccotts End, damaging the environment around it, Leighton buzzard road with increased traffic and increased risk of flooding in the area from surface run off
- Different types of pollution noise, air, light
- Working farm loss of agricultural land
- Diverse wildlife
- Should be provision for a new hospital facility on the site, working together with St Albans to provide this. Hertsvalleyhospital.co.uk
- Claims that this land is grade 3 good for absorbing pollution
- Concern from the Leverstock Green Village Association (LVGA)- that leverstock green will become absorbed by the developments that would surround the north and east of Hemel and how to minimise this impact
- Important to have habitat connectivity and protection of bio diversity, do not want to end up with isolated areas
- Argument that these sites would be increasingly car dependent due to its location.
- Chilterns AONB, ancient woodland, Chilterns beechwoods special area of conservation, area of archaeological significance
- Large road through the development would impact on the environment
- Goes against core strategy P8.24 that countryside will help to maintain separation of other communities and to protect the gade valley
- Flight path near the proposed development impact on the scheme?

HH-h2 North of Gadebridge (Land at Piccotts End)

- Schedule of site appraisals technical studies assessments that this is excluded from further assessment and to be retained as greenbelt reinforced by the key land uses and sustainability conclusion.
- Concern of flooding, loss of recreational facilities and views for Piccotts End residents
- Conservation area and area of archaeological significance, within the flood plain
- Support for this site to reduce the strain on roads/ infrastructure in the more rural/ village locations.
- Flooding risk
- Loss of settlement diversity/ separation
- Stage 2 green belt study was not identified as an area to be recommended for further assessment, also deemed an area of archaeological significance, and ancient monument to the south of the site
- Pressure on local infrastructure
- High Gade Valley Landscape Assessment 123 restrict further development within the valley and develop a strategy for mitigating existing impacts
- Stage 2 green belt review and landscape appraisal not recommended for further study
- Possible impact on protected species close to wildlife and ancient woodland.

HH-h3 Land at Shendish, London Road

- Support for this site as it has lower land value in terms of ecology and is in a good location with transport links, utilities.
- Other arguments to say that this is not acceptable, lack of infrastructure, traffic, public transport including station parking, shops and social infrastructure
- Concern that if this site is allowed King Langley and Hemel Hempstead will become one settlement, would cause further traffic issues at Rucklers Lane or A4251 and that there would be a substantial increase in pollution in the area should development start, slow traffic movements in this area already.
- Conservation area, listed buildings, special architectural and/ or historic interest, traffic, impact on wildlife, loss of green space for walkers, also mention that there is a high risk that heritage assets with interest could be present according to County Archaeologist so full assessment would be required.
- Rucklers lane and Shendish Drive both small narrow roads that cannot accommodate high levels of traffic basically one lane
- Modification order to extend public footpaths unsuitable for development
- Loss of valuable leisure/ community asset.
- Claims that proposals to build on the site in the past have been due to it being a heritage site, loss trees green belt etc.
- Addition of a school on the site would only add to the problem of congestion on the roads.

- Road safety particularly within Rucklers lane and issues of wildlife/ children in the road including the Scouts club, again mention of wildlife cyclists etc. using the land and how housing will impact on this.
- Claims that this is not to support Kings Langley housing need and that no more than 50 homes should be built within the village to cater for Hemel Hempsteads' needs. No practical road access or road improvements that could be made.
- Shendish locally registered as a park and garden grade 2 listed buildings and no detail regarding how they will be protected within the schedule of site appraisals. Several trees on the property, which have a tree protection order and would require assessment.
- Already an air quality management area in Apsley/ general area development at Shendish would worsen this.
- Impact on wildlife a number of different animals living in the area deer, badger etc.
- Currently used as a community facility for getting people outside etc.
- Could not be improved due to land restrictions
- Arguments that some housing could be provided as long as this is not 900 homes and would lose the separation between Hemel and Kings Langley. Land between Rucklers Lane and Coniston Road needs to be preserved.
- Inaccuracy in the shendish submission nine properties are privately owned within the north of the site so should be amended in site appraisals. Historic environment and its impact on listed buildings, biodiversity- goes against the biodiversity action plan.
- Landscape and flood risk, already lots of surface run off, impact on local landscape
- Health and well being, recreational facilities as well, rights of way and is actively used- mental health
- Shendish Manor hotel and Apsley manor farm are protected by strict planning regulations- park of historic interest site assessment says that it is unsuitable for development
- ARUP report- claim that only a small part of Shendish could be developed because there would be less impact, however still scope for further assessment.
- Claims that it said that the golf course would be retained and that no development would be going forward.
- South eastern corner of the site is undergoing a review area of special environmental/ ecological importance.
- Healthcare/social infrastructure provision cannot handle growth
- Need to protect public rights of way
- Do not want development to go forward because it will burden infrastructure which the council will have to pay for, costs to be covered by developers
- 2002 inspectors report states that shendish is not suitable for housebuilding.
- Report submitted to DM referred to Natural England designated woodland and soluble rock hazard in a contamination report when asking for planning permission to extend the manor.

- Secondary school provision in the area is not adequate to cater another primary school kings Langley only just extended to cater for growth.
- Shendish included in the South Hemel Development plan and Kings Langley is in the Hemel Development plan.
- Affordable housing
- Site size has been reduced since it was previously promoted in the green belt review with proposed allocation at the eastern side of the site- to be assessed separately.

HH-e1 Land east of A41 at Felden

- Issues of traffic congestion and parking problems in this area.
- Owners of the site (Felden Park Farms Ltd) produced a report to advise on the issues and design solutions for the development site access from Two Waters Way. Diverse mixture of employment including office, light industrial and distribution.
- Close to Roughdown Common SSSI and wildlife site

Statutory consultees

- Grovehill Future Neighbourhood Forum- ask for plans to be carried out in alignment with the aims of the Grovehill Neighbourhood Plan.
- Thames Water Utilities state that there will be a need to improvements to the waste water/ drainage infrastructure on the allocated site in all HH sites. Request that developers work with thames water and that a drainage strategy is included as part of the planning application process. The development of HH-h1a would need to plan the infrastructure improvements and need to do so before development otherwise they may need to introduce a phasing requirement that would slow down development
- Redbourn Parish Council- objection to the proposed development of HH-h1a and HH-h1b goes against the purposes of the NPPF in that it would narrow the gap between Hemel and Redbourn and would have environmental and an infrastructure impact particularly traffic volumes.
- Great Gaddesden Parish Council- development of the North Hemel area would have a negative impact on their way of life. Claims that the Environment Agency stated that there is not enough sustainable water sources. Impact on AONB, pollution, traffic, loss of land.
- Hertfordshire County Council- some overlap with the Minerals Local Plan- consultation with county to decide whether the applicant will need to extract minerals prior to development. Work with the archaeological team in

assessing sites. Transport provision in site HH-h1a poorly connected, require a new bus service. H1b is better connected but a bus route between reborn road and Leighton buzzard road would be better range of infrastructure would be needed. H2 poorly connected and size of development limits potential to. H3 limited access to the site from London Road means that bus loop in the site would be needed if the full site is developed. Hh-e1 access to the site should be on two waters road to encourage sustainable transport. Herts Ecology further assessment is needed on all of the sites in Hemel Hempstead.

- Chilterns Conservation Board- holding objection until a proper assessment of the impact of development on AONB has been conducted.

Sites put forward

Keir Park- residential development of 292 dwellings over 5 buildings ranging from 5 to 8 storeys.

Question Number 46 Kings Langley

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note, which accompanies it?- Kings Langley

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Summary: Respondents have highlighted numerous concerns regarding the development of potential sites within the Kings Langley area. The comments produced some key themes that throughout all of the sites which are as follows:

- Infrastructure provision, which includes healthcare services (Hospitals, GPs and Dentists), Digital Infrastructure (Phone and Broadband) and green spaces and accessibility.
- Highways, which includes traffic issues and road capacity, provision of public transport and its capacity, parking availability and pollution.
- Environment including impacts on wildlife, ecology, risk of flooding and its importance on people's wellbeing with access to nature and public footpaths.
- Historic environment including village character and the potential impacts on ancient monuments.
- Greenbelt release and urban sprawl into other settlements
- The impacts that development would have on community assets.

1025 people made a response to question 46: 'Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note for Kings Langley' of which all 1025 left a comment. Several residents groups also left a comment. KL&DRA (which made 3 response) and GFRA (which made 3 responses).

There were other points also mentioned throughout this response that will be answered in questions that relate better to these topics and so these concerns can be better examined. The other questions that will examine these topics are as follows:

- Question 2: Have we reflected all the cross boundary issues, or issues of particular importance to you or your organisation?
- Question 5: Does our current Core Strategy reflect the specific local aspirations and/or qualities that you feel should continue to be reflected in the visions for Hemel Hempstead, Berkhamsted, Tring, Markyate, Kings Langley, Bovingdon, or the wider countryside?
- Question 8: Do you agree with the proposed approach to distributing new development?
- Question 9: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised above?
- Question 11: Do you agree with the proposed approach to selecting sites?

- Question 12: Do you think that we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?
- Question 16: Which figure of housing need do you think is the most reasonable to use
- Question 17: Do you agree with the proposed approach to affordable housing?
- Question 25: Do you support the proposed approach to the natural environment?
- Question 26: Do you support the proposed approach to the historic environment?
- Question 27: Do you support the proposed approach to protecting natural resources, preventing pollution and controlling flood risk?
- Question 29: Do you agree that we have covered all relevant issues relating to physical infrastructure?
- Question 30: Do you think that we have covered all relevant issues relating to social infrastructure?
- Question 31: Do you think that we have covered all issues relating to green infrastructure?
- Question 32: Has the Council identified all appropriate mechanisms through which it can help support the delivery of new infrastructure?

This list is not extensive as there will be comments that overlap into other questions.

Local plan

- Lack of infrastructure- shops, highways/transport, healthcare, green space- digital infrastructure at the limit, waiting list for broadband and phone system is at the maximum
- Greenbelt and urban sprawl
- Wildlife/environment/green space
- Pollution/air quality
- Flooding
- Unaffordable for local people
- Hospital
- Impact on site lines
- Impact on the historic environment
- Residents feel that the classification of Shendish is purposefully misleading- will need to change this to reflect the housing numbers in individual settlements
- Failure to see how green travel plans (travel plans in general) are coming into effect- selected locations don't meet this objective
- Measures to reduce car use appear ineffective with cars parking on local roads- Nash Mills
- Provision/accessibility of emergency services in the area
- South West Hertfordshire Growth and Transport plan
- New road infrastructure would not be possible due to restrictions in available land

- Crowd funding for infrastructure through council tax?
- Option 1A preferred option, some consideration for 1C
- Sites do not conform to the proposed objectives of new local plan that is included in the issues and options document.
- Kings Langley residents association loss of character, school places etc
- Traffic and parking
- Community
- Transport provision is not good due to the poor collaboration between neighbouring authorities
- Effects of other housing allocations in Kings Langley from Three Rivers District Council
- Mental health/ impact on the community of having green space/health benefits
- Brownfield assessment of available land, changes in ONS figures for need?
- Kings Langley & District Residents Association agreeing the points made- transport, greenbelt, land not accurately assessed, schools etc.

KL-h1 Land at Hill Farm, Love Lane

- Road capacity and safety issues- Access to the school 50 metres from the school entrance- already traffic calming measures introduced in the area, slip road added onto A41
- Unsustainable location
- Education provision/impact- argument that the schools (Kings Langley Secondary school specifically) is over subscribed
- Impact on Kings Langley Conservation Area and setting
- Greenbelt loss
- Flood risk increase
- Ecology/conservation area
- Good for sports access
- Area of Outstanding Natural Beauty
- This site is used as a flight path for light-aircraft and helicopters, safety concerns
- Lack of clarity in the site plans e.g steep access to the site, how traffic issues created would be addressed
- Wildlife

KL-h2 Land at Rectory Farm, Hempstead Road- Mixed views on this site acceptable providing it provides starter/eco homes and only uses the existing brownfield section of the site.

- Area of congestion
- Merger/ urban sprawl threat
- Flood risk- according to environment agency **not a consultee comment**
- Pressure on road network and infrastructure
- Of all sites promoted this is the most acceptable- brownfield/redevelopment of existing farm buildings.
- Land is already sold/being sold to a developer
- TIK (Transition in Kings) local growing potential to develop this in return for land for the Sunnyside Rural Trust (Hemel Food Garden)

- Good quality farmland, allotments, only open land on both sides from M25 to Boxmoor
- Wildlife along the canal/wildlife corridor- wildlife assessment to ensure development does not effect this.
- Vision for a community amenity site- plans to build a co housing development that supports community- Kings Langley Community Benefit Society.
- Support for development of this site as brownfield 50 low impact homes
- Access issues
- Community assets- football club
- Designated area of Outstanding Natural Beauty

KL-h3 Land to the east of A41 and Wayside Farm, Watford Road- Strong objection for this site generally

- Historic/ Archaeological interest- 2 areas within this site scheduled ancient monument
- Loss of village character/quality of life
- Provides employment/ dairy farm/ community asset
- Area of congestion road and rail
- Unnecessary to provide office space
- Stage 2 Green Belt Review and Landscape appraisal maintains separation from Abbots Langley
- Loss of public footpaths/ rights of way- NPPF
- Suggested as a site to provide a new acute hospital
- Part of the site in smaller parcel is in a flood zone and designated a Woodland Priority Habitat Network
- Air quality concerns
- Wildlife
- Scale of development suggested here would be comparable to new settlement council said this would be ruled out.
- Important education facility
- Consideration of this site for hospital use following Herts valley commissioning group study
- Within Chilterns AONB
- Grade 3 agricultural land

Statutory consultees

- Abbots Langley Parish Council- Consideration of how development will impact their parish- infrastructure, road capacity and health, improvements to road infrastructure would be necessary.
- Flaunden Parish Council- Development in Bovingdon and Kings Langley would restrict access to Hemel Hempstead and Chesham, transport concerns and education provision
- Chiltern Society- concern with access, conservation and listed buildings on KL-h1, assessment of village services for capacity. KL-h2 potential flood risk along the canal, development here would go against greenbelt objectives. KL-

h3 go against greenbelt objectives removing the gap between Kings Langley and Watford. Development of all sites would damage village character.

- Thames Water Utilities- Issues with wastewater on all 3 sites. Assets under the site than need to be protected.
- Hertfordshire County Council- KL-h3 takes into account the adopted Mineral Consultation Area, determine whether there is need for applicants to complete mineral extraction within the site before development (Kings Langley sites consist of Brick clay and sand and gravel).
- Hertfordshire County Council- Natural, Historic & Built Environment Advisory Team- KL-h3 have areas of archaeological significance would need to have assessment should sites come forward.
- Hertfordshire County Council- Transport Access and Road Safety Unit (TARS) transport assessments providing bus routes to the sites
- Hertfordshire County Council- Herts Ecology- Further work to be carried out on all of the sites loss of local farmland, and Kings Langley Common (KL-h1), enhancement along the river and landscaping against the football club (KL-h2), offsetting of lost farming/grazing land (KL-h3)
- Chipperfield Parish Council- traffic increase would have an impact on their community if development in Bovington and Kings Langley were to go through

Proximity of two waters school would make development of primary school on shendish impractical- cell 28

Sustainability Appraisal some areas exceed air quality objectives

Sites promoted- Bovington Airfield

Question Number 46 Markyate

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note which accompanies it? Markyate

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

30 people made a response to question 46: 'Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisals working note for Markyate' of which all 30 left a comment.

Other representations that have been made within this question which do not specifically relate will be addressed in other questions that better consider these views and are as follows:

- Question 3: Have we taken account of all relevant studies and reports as part of our Issues and Options work?
- Question 9: Do you agree with the proposed approach to the Green Belt and Major Developed Sites summarised?
- Question 12: Do you think that we have covered the key issues relating to roads, transport and accessibility that should be addressed in the new Local Plan?
- Question 29: Do you agree that we have covered all relevant issues relating to physical infrastructure?
- Question 30: Do you think that we have covered all relevant issues relating to social infrastructure?

Local Plan (General)

- Have not made use of the available brownfield sites.
- Worsen traffic issues, pollution and parking availability
- Social infrastructure capacity (Schools and Doctors)
- Green Belt- concern raised that the ARUP review of this was flawed.
- Physical infrastructure (utilities/ waste water/ broadband/ electricity/ phone signal)- shops units also empty
- Points raised that there is little housing demand in Markyate
- There has been several large scale developments in Markyate which is against Dacorum policy
- Providing enough social housing
- Growth should be located near areas with transport infrastructure- currently limited access and frequency

My-h1 Land South of Markyate

- Noise and air pollution from Luton Airport
- Waste water infrastructure
- Flooding
- Viable development area with few constraints
- Support for this site to provide physical and social infrastructure

My-h2 Land at Pickford Road

- Not in keeping with village character based on proposed density
- Does not encourage active travel
- Goes against policy 97 Chilterns Area of Outstanding Natural Beauty, and the Chilterns Area of Outstanding Natural Beauty Management Plan 2014-2019
- Site does not fall within the Markyate village boundary and is within Cheverells Green which adjoins the village
- Negative impact on the historic environment
- Issues of road safety lack of pedestrian routes
- Issues with the site being located near the private Beechwood Park School that causes additional traffic/safety issues in the village- assessment of traffic volumes

Statutory Consultee

- Chilterns Conservation Board- Object to both sites due to the negative impacts it would have on Chiltern AONB, wildlife, chalk streams, public walkways etc. Suggest the use of Cumulative impacts of Development on Chilterns AONB report.
- Markyate Parish Council- Concern about both of the sites promoted. **My-h1** run off into River Ver. Protected water meadows area between Markyate and St Albans. The site is too far away from the village centre, the transport services are limited and development would mean greater car use in the village. **My-h2** is located on a hill on the outskirts of the village makes it impractical without a car. – other issues raised including traffic problems, lack of social infrastructure (Doctors), the provision of sustainable transport and the protection of Green Belt and Chilterns AONB. Have also included comments on what development they would like to see to improve conditions in the village. - Provision for new care home at Caddington hall, road widening and improved safety for road users.
- Chilterns Society- Site My-h1 would have an impact on the River Ver, and has flooding risk with some of the site being in the floodplain. Provides an opportunity to improve environment around River Ver. Site My-h2 is not acceptable for growth impact on wildlife and AONB, site would not encourage walking or cycling due to topography of the site.
- Thames Water Utilities- Concern that wastewater capacity is unsuitable for the proposed levels of development on site My-h1- consultation between Thames and developer to inform the infrastructure required and to include such strategy within the planning application. (No issues raised for site My-h2).
- Hertfordshire County Council- My-h1 is in a good location in terms of public transport connections and the ability for the site to encourage active travel. My-h2 is less well positioned but limited number of homes should limit the impact

of this. **Herts Ecology-** Ancient Semi-Natural Woodland should not be referenced in the same way as Ancient Woodland, and Wildlife Sites should be included. Further work needed on site My-h1 to determine whether there is any ecological significance and enhancements to the river corridor should be considered. My-h2 need for further assessment of the site, some areas could include wildlife sites and should not be developed in those areas.

Sites promoted

- Land along Buckland Road approaching from Studham- Markyate Parish Council
- ARUP made suggestion of site to the south of Markyate- Guinness Partnership
- Land behind Cavendish Road/ Primary School and the movement of the Fire Station to this site- within AONB
- Site from Mr R Smith and Mr A Lyell (Bidwells) site connecting to My-h1 Land south of Markyate- could include provision for new community infrastructure.
- Development to the North East of Markyate on RA.A2 within the ARUP stage 2 Green Belt review appendix 4 report

Question Number 46- Tring

Question Text: Do you have any feedback on any of the sites contained in the draft Schedule of Site Appraisals or the Sustainability Appraisal working note, which accompanies it? Tring

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Local Plan (General)

- Developments should all be higher density using CABE Better Neighbourhoods: Making higher densities work report.
- Need for additional infrastructure to support development (Doctors/ schools/ hospitals/ utilities/ water availability/ drainage/ Transport provision- station at capacity- including parking and infrequent bus services)- no mention of broadband or parking during exhibitions.- also include other provisions such as children's play space
- Road between Tr-h1, Tr-h2 and Tr-h3 should not be developed.
- Highways capacity and condition
- Impact on Chilterns AONB/ wildlife/ Green Belt/ Chilterns Beechwoods Special Area of Conservation
- Pollution air/ noise/ light
- Urban Sprawl, should promote infill development
- Ivy House and Bank Mill not suitable for development
- Development to the North and South of Tring
- Land on both sides of Marshcroft Lane (Tr-h1 and Tr-h2) have important value in terms of landscape and the town
- Green Belt acts as an important buffer to Chilterns AONB on sites 1,2, 3, and 6.
- Any development to be in keeping with Tring's existing character low rise developments
- Should provide greater levels of affordable housing
- Particular issues regarding hospital provision agreement with Bucks to use hospital in Aylesbury and the effect of housing on this agreement.
- Developer contributions to be used within their respective areas
- GRFA/ Chilterns Countryside Group- Losing lots of facilities, garage, bank and farm including farm shop and café (does not have the infrastructure to support development), increased risk of water shortages and flooding which will have an effect on wildlife, and the importance of maintaining agricultural land.-Tr-h1, h2 and h3 do not provide a reasonable allocation given the requirements of the Borough and Tring. Providing 800 homes based on 602 per annum housing need is appropriate for the size of development based on current settlement size and capacity
- Food production
- Concern about where/ how new school provision will be provided- already schools at capacity.

- Towns are better suited to take more housing as their infrastructure can be more easily improved
- Development near transport links that are not developed e.g. Tring and Cheddington
- Support for the development of all sites in Tring and Berkhamsted to provide/ cater for employees in the area that are unable to live locally.
- Concern about the over development of Tring based on proposed housing figures
- Providing the necessary employment and leisure/community facilities to support any developments
- No need to provide further industrial sites, Icknield way site could be expanded
- Need to provide new sports infrastructure so this is not lost by redevelopment- need for this mentioned by the sports clubs in Tring
- More housing to be allocated to Kings Langley- more equal share of development across the Borough
- Support for option 1A, 2B and 2C- amend provisions to 500 in the urban area and 620 in Green Belt
- How social/ affordable housing needs are to be met
- Call for development near Tring station- Tr-h1 and Tr-h5
- Limited facilities for disabled residents
- Housing to focus on larger towns Berkhamsted and Hemel Hempstead, and distribute more evenly across the rural settlements in the Borough so that their housing need is addressed.
- Need to resolve issues relating to the foot and cycle paths- increase the provision of this to discourage car use
- GFRA- Failed to demonstrate the need for Green Belt release, and the exceptional circumstances- need for housing and infrastructure to be discussed with other authorities, argue that this could be unlawful as some of the housing numbers of East Hemel Hempstead should count towards Dacorums housing number (makes reference to the ongoing dispute with St Albans regarding housing numbers and that without this being resolved it is not necessary to allocate the green belt land), need the sites to be assessed against green belt purposes in the NPPF and using the agricultural land classification system (material consideration) land 2 or above (Tr-h1, h2 h2 and h4) should be preserved for such purposes- some of site 2, 3, 4 and 5 could be amended, but h6 was no included within the green belt assessment.- sites 1,2, and 3 contribute to all 5 functions of green belt. Sites Tr-h5 and Tr-h6 would cause the least harm to the Green Belt. Should green belt development go forward it should take consideration of its evidence base
- Herts & Middlesex Badger Group- some sites are of concern regarding the impact on wildlife, feel that 1000 homes would have a serious impact on badger and wildlife populations
- Concern about what the affordable housing means and the amount of affordable housing that will be provided

- green belt and character of AONB to be protected, alternative sites available where infrastructure could support development, transport and traffic congestion, healthcare, school, parking, broadband
- Development should be focused on Hemel Hempstead
- How new employment opportunities are to be provided
- Chilterns Conservation Board report on the Cumulative Impact of Development on the Chilterns AONB
- Need for planning approval/process regarding infrastructure delivery- how this will be put into effect in policy
- Housing to be based on community needs
- Dacorum Sports Network- ask to be consulted regarding how the required sports facilities will be integrated- have some of their own proposals for the different sites and around Tring
- Harrow estates- Inclusion of Tr-h1, Tr-h2 and land lying between Marshcroft Lane and Bulbourne Road which could provide a good expansion of the town-linked village approach

Tr-h1 Land to the north of Station Road

- Double the currently planned density levels
- Help to connect Tring station to Tring town
- Ecological importance
- Wildlife
- Support for this site to be developed makes sense near transport infrastructure, and would improve connections between the town and train station on the condition that green corridors are introduced, also like that there has been planned provision for a school and shop
- Flooding
- Outside town boundary
- Not recommended for further assessment in Stage 2 Green Belt Review
- Unsafe road access- narrow roads, and danger for pedestrians and cyclists
- Negative visual impact
- Agricultural land
- Used for leisure/health purposes
- Area of archaeological significance
- Oil pipeline cross the site
- Development is inappropriate for the area.
- Require high levels of infrastructure improvements and does not provide a sensible settlement boundary that would result in further expansion until Tring and Tring station connect
- Negative impact on the environment is housing and distributor road were built here
- Does not conform to Trings natural boundary- 20% increase of the town and would change town character- poorly connected to the town centre
- Negative impact on local traffic and parking at and near the station
- Need for cross boundary discussion for this site due to the impact other councils have on the area.
- Land here helps to prevent the merger of settlements

- Traffic from sports pitches, and railway station

Tr-h2 Land west of Marshcroft Lane

- Should only be developed in conjunction with site Tr-h3 to create a boundary of the town, need to increase density to ensure services and facilities are upgraded- greater support for this over other sites
- Should be a secondary site to provide further growth
- Wildlife
- Chilterns AONB
- Ecology
- Not recommended for further assessment in Stage 2 Green Belt Review
- Unsafe road access- Narrow roads and cul-de-sac location and issues such as the canal bridge mean traffic volumes will be an issues- additional road pressure due to its location against existing housing and distance from town centre (same arguments as/ for Tr-h1)
- Negative visual impact- from Ridgway trail as housing would be seen from this
- Agricultural land
- Used for leisure/health purposes- includes Tr-h1
- Area of archaeological significance
- Flooding
- Poor pedestrian access- lack of pavements
- Green barriers to make this acceptable
- Road access issues
- High quality agricultural land
- Negative impact on the environment is housing and distributor road were built here
- Lose of ancient woodland
- Traffic

Tr-h3 Land at Icknield Way/ Grove Road (New Mill)

- Good location following settlement boundaries- greater support for this over other sites
- Should be a secondary site to provide further growth
- Ecology/ good agricultural land
- Retained as Green Belt
- Preferred option for housing
- Green barriers to make this acceptable
- Distinct settlement character that would be lost if development were to take place
- Few facilities within this area of town would need to be some provision of this
- Traffic
- Gallagher Estates- considered for further assessment green belt review stage 2, least constraints regarding the main issues phase 1 habitat survey carried out

Tr-h4 Land at Cow Lane/ Station Road

- Not suitable for retail, industrial or warehousing should provide housing
- In Pendley/Chilterns AONB

- Historic buildings
- Support for housing here- providing there was screening.
- Retained as Green Belt
- Used for leisure/ heath purposes
- Site promoters (Castle Planning)- believe that there is limited need for infrastructure improvements and the site can be brought forward in a short to medium time period, and could promote sites further in Tring. Sustainable location due to its proximity to existing development and its connections to the train station and local bus route.
- Wildlife site
- Unsafe road network near this site- Cow Lane and Station Road
- Important to retain as part of town character

Tr-h5 Land at Dunsley Farm, London Road

- Density here should be doubled.- preferred site due to infrastructure and potential to increase housing numbers – screening from the road to maintain settlement character
- Should not be developed as it is the entrance to the town and important for maintaining village character.
- Next to Chilterns Area of Outstanding Natural Beauty
- Green belt- green corridor
- Not suitable for retail, industrial or warehousing should provide housing, otherwise this would change the character of the area- already concerns raised from the noise and pollution from HGVs in the area and there is no identified need for this in Tring
- Need to retain some of this land for playing fields for Tring School expansion
- Heritage farm- higher level stewardship scheme, supports biodiversity, agricultural land and employment
- Maintain for education and social uses.
- Loss of business/ employment land
- Potential to develop some of this land to meet housing need towards the North.
- Site is isolated so has no impact on the visual or accessibility on landscape and has been previously developed, better connections between town and train station (Castle Planning)
- Development here would go against the vision of the Local Plan and damage Dacorum landscape character
- Flooding
- Site was promoted for development before and was rejected
- Provides some leisure and sports facilities which would be lost
- Agricultural land- food production
- Wildlife
- Adjacent to Pendley Manor listed building and locally registered park- impact on historic environment and heritage assets, would also impact on Tring park
- Support for this site to potentially provide a new secondary school
- Need to review the impact that development on this site would have on the landscape, impact on the quality of life.

- Identified need for additional playing space and facilities according to Playing Pitch Strategy & Action Plan 2015-2025- believe this site can support housing growth in Tring and provide the additional sports facilities
- Most sensible site for development, would need to provide additional infrastructure before development- schools and other local services

Tr-h6 Land north of Icknield Way (Waterside Way)

- Should be a secondary site to provide further growth
- Flood risk
- Wildlife
- Not recommended for further assessment in Stage 2 Green Belt Review
- Use to maintain separation between town and canal.
- Important buffer for Chilterns Area of Outstanding Natural Beauty
- Visually intrusive on AONB, inclusion of a marina would have a negative impact on the natural environment.
- Does not conform to Tring natural boundary.
- Joining up of Tring and other settlements- would risk the possibility of further development
- Poor location for transport links
- Waterside Way Sustainable Planning Ltd- no constraints identified on the site- could include provision for marina and playing pitches

Statutory Consultees

- Sport England- Development on site Tr-h5 Land at Dunsley Farm, London Road would have an impact on the existing sports facilities, which are in the area. Playing Pitch Strategy states that the cricket provision is overplayed and development of the site would mean that there is no availability to expand these facilities. Tr-h6 includes a football site that would be lost.
- Chilterns Conservation Board- Objection to site Tr-h4 Land at Cow Lane/ Station Road as this site is situated within the Chilterns Area of Outstanding Natural Beauty. Make objections to all sites on the grounds that they are within or would impact on the Chilterns Area of Outstanding Natural Beauty. Suggest there should be a study on AONB land similar to the Green Belt study, and that greater consideration of the Cumulative impact of development on the Chilterns AONB should be made.
- Aldbury Parish Council- Against the development of Tr-h1 against Green Belt policy in that it maintains separation from Aldbury Parish and the Chilterns AONB. This development would also need to consider physical and social infrastructure provisions, and does not perform well with regards to active travel, public transport and road capacity/safety issues. Against the linking of sites Tr-h1, Tr-h2 and Tr-h3 as this would provide too much housing in the community and would worsen traffic situations even with a relief road. Support for option 2B

- Chilterns Society- Support for option 1B, Green Belt to retain separation from other growing settlements and protect Chilterns AONB. Concern about employment land availability. **Tr-h1** Too far from services and employment land in Tring town centre unsustainable location would also negatively affect Chilterns AONB and wildlife and should consider the canal. **Tr-h2** same reasons and the narrow lane access is unsuitable for traffic increase. **Tr-h3** borders Article 4 direction land, and Chilterns AONB and has views towards Ivinghoe Beacon. Too far from town and lacks infrastructure, and should remain open as other towns expand closer. **Tr-h4** same reasons. **Tr-h5** Support for site as it encourages active travel and located within a bus route, Bungalow and Orchard to be excluded. **Tr-h6** Remain Green Belt impact on AONB and maintains boundary with Aylesbury.

- Tring Town Council- Any development in Tring needs to provide the necessary infrastructure to support the town, whilst retaining the settlement character and its viability. – Retail, jobs, office space and affordable housing which is suited to local needs, no more than 300 extra homes at Tr-h5 based on the 500 homes allocated at LA5 Icknield Way, West of Tring. Tr-h5 has the potential to provide a mixed-use development based on option 1A being chosen. Young people unable to live in the area care for the elderly and disabled, parking and traffic issues, environmental protection and resource efficiency. Any development should provide infrastructure changes necessary and retain the character of the town and protect the countryside. The ability to absorb higher housing growth dependent on the amount of extra houses being taken by Hemel Hempstead.

- Aylesbury Vale District Council- Development of Tr-h6 Land north of Icknield Way (Waterside Way) concerned that this could lead to further development on this side of Tring, which would negatively impact on visuals and the landscape in Aylesbury Vale.

- Thames Water Utilities- Require consultation on all of the sites promoted in Tring as there is concern about the waste water treatment capacity.

- Hertfordshire County Council- Development services, Property and Resources- Support for the development of site Tr-h5 Land at Dunsley Farm, London Road- could provide greater education capacity, promote active travel, and provide economic growth. No justification for it to remain Green Belt because school grounds would maintain openness, levels of traffic could be accommodated.

- Hertfordshire County Council- Natural, Historic & Built Environment Advisory Team- potentially some areas of archaeological interest on site Tr-h5, and would like to see assessments done on remaining sites, heritage asset does

not need to be designated to warrant conservation, and maybe necessary to carry out pre-application assessments on the sites.

- Hertfordshire County Council- Transport, Access and Road Safety Unit- Tr-h1 would be able to provide supporting infrastructure, potential for new road through the site to enable a new bus service. Tr-h2 good location, accessible distance to bus stops that serve all of the main facilities in Tring. Tr-h3 may be necessary to add additional bus stops along this route so that all dwellings are within 400m. Tr-h4 potential for active travel from this site to the station and served by local buses. Tr-h5 Cow lane is not well served by buses so potential need for a diversion through the site to ensure all dwellings meet the 400m radius, maybe need to improve access on Cow Lane. Tr-h6 need for the existing route of this bus service to be extended through the site to ensure all dwellings are catered for and need for a bus turning facility.
- Hertfordshire County Council- Herts Ecology- Tr-h1 work required to inform ecological impact, 2 wildlife sites adjacent to the site and this should be considered, possible need to offset arable land through offsetting contribution, as well as SANGS contributions. Tr-h2 further work to inform ecological impact, SANGS contribution. Tr-h3 further work needed, some important boundary features to maintain, but no obvious constraint, may require SANGS and biodiversity offsetting. Tr-h4 further work needed, no obvious constraints, some offsetting could be considered and SANGS contributions. Tr-h5 further work needed, Eastern half of the site near Wildlife site and adjacent to another wildlife site isolation of these should be avoided if the site is to be developed. Wildlife site grassland is a significant local constraint and should be addressed as necessary. Biodiversity offsetting to be provided due to this and loss of mixed farmland ecology, SANGS contribution. Tr-h6 further work required to inform ecological impacts, no obvious constraint, and proximity to the canal should be buffered and enhanced, contributions to SANGS due to loss of agricultural land.

Sites promoted

- Haslam fields for future development
 - Land in Cow Roast and near the A41
 - Land near Tr-h5 land to the south of this between A41 and the town
- Duckmore lane- Area where the allotments are currently located

Question Number 48 (SUPPLEMENTARY QUESTION CREATED TO CAPTURE RESPONSES NOT SPECIFIC TO THE FORMAL QUESTIONS – 1 to 46)

Question Text: Do you have any other comments to make which are not covered by any of the previous questions? Please provide your comments here

If yes, please make it clear to which sites(s) your comments relate and refer to evidence where available

Summary:

281 responses were received of which 271 stated they had further comments to make.

BRAG responses: 73

GFRA responses 105

Many of the responses have been covered more appropriately in other questions but some common themes remained, including:

- Application of the Green Belt policy is inconsistent with national policy (residents generally felt too much Green Belt land will be released, developers too little).
- Queries were raised on the validity and veracity of the evidence bases and their application (such as the identified capacity for new homes).
- Historic England felt strongly that too little prominence has been given to the historic environment and (also shared by many residents) the character of the landscape and built environment. Also concerned about the evidence base used to inform the emerging plan.
- Thames Water gave a reminder given of cumulative impacts from neighbouring areas and use of the planning system to ensure that infrastructure upgrades are provided in a timely manner.
- AVDC and CBC raised queries about the duration and scope of the local plan, feeling it went beyond what was required
- The impact on the environment (including wildlife, flooding and greenbelt and rural/agricultural land)
- Deficiencies in existing, and future impacts upon, already stretched infrastructure (including road and parking capacity, flood alleviation, healthcare and education provision)

Comments - Statutory consultees

- Buckinghamshire County Council – BCC refers to its response in letter dated 13 December 2017 and its comments mainly relate to education, transport

and highways, Green Belt, Green Infrastructure and heritage which are covered in other Q's.

- Berkhamsted Town Council – Raised a number of points dealt with in other questions and largely follows BRAG's representations. Other general comments include:
 - Development of Berkhamsted should be consistent with the 2013 Core Strategy. House building rates and green belt releases around market towns suggested in IO Consultation are a significant departure from the policies in the Core Strategy.
 - Large Green Belt releases around the market towns would mean that the Settlement Hierarchy described in the Core Strategy will have been abandoned.
 - Urban capacity of Hemel Hempstead needs to be revisited in light of recent government statements on increasing building height and densities in suitable locations. Revised urban capacity would reduce need to build in Green Belt
 - Current household build rate per annum in Berkhamsted is nearly twice that targeted. At current rate most of the estimated target capacity will be deployed by 2020 whilst the rest of Dacorum lags behind target.
 - Infrastructure deficits evident and only provision of housing on large sites can deliver the necessary supporting infrastructure without detrimentally impacting on existing settlements. The infrastructure [in Berkhamsted] is already deficient, let alone for any future housing development.
 - Supplementary Planning Guidelines, particularly in respect of Character Area Appraisals, should be maintained.
 - Protection of wildlife corridors should form an important part of any proposals. Green Belt releases can only detrimentally affect wildlife provision

- Aylesbury Vale District Council - Overall, AVDC supports the ambitions of the plan and the key issues have been identified and options are provided capable of meeting the issues identified. Two specific points:
 - Section 3.3 why is the New Local Plan needed and queried why the local plan time horizon is 2036 when the NPPF only requires a 15 year plan?
 - Para 3.3.2 - The Single Local Plan seems to be looking at many more issues (e.g. tourism, green infrastructure) than the three issues that came out of the Core Strategy Examination to be covered in the early review - why is this?

- Central Bedfordshire Council - Generally supportive. Identical concern over para 3.3.2 as AVDC above.

- Historic England – Generally supportive but concerns expressed over the evidence base used and the perceived need to give the historic environment more prominence in the emerging Plan. Comments included:
 - Paragraph 126 of the NPPF requires Local Plans to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment. The strategy should offer:
 - A strategic overview including overarching heritage policies to deliver the conservation and enhancement of the environment.
 - A positive holistic approach whereby the historic environment is considered not just in isolation but as an integral part of every aspect of the plan, being interwoven within the entire document.
 - Policies for housing, retail, and transport for example may need to be tailored to achieve the positive improvements that paragraph 8 of the NPPF demands.
 - Site allocations should refer to the historic environment, identifying opportunities to conserve and enhance the historic environment, avoid harming heritage assets and their settings and may also positively address heritage assets at risk. The plan may need to include areas identified as being inappropriate for certain types of development due to the impact they would have on the historic environment.
 - Expect references to the historic environment in the local plan vision, the inclusion of a policy/ies for the historic environment and character of the landscape and built environment, and various other references to the historic environment relating to the unique characteristics of the area.
 - Comments on the site allocation process included:
 - Evidence base:
 - None of the supporting studies for the emerging Plan (SHMA, South West Herts Economic Study, Sustainability Appraisal, Habitats Regulation Assessment, Scoping, ARUP’s Greenbelt Assessment Report and “Planning for Growth: Borough Profile”) addresses the historic environment, landscape or heritage. It would appear that the evidence for the current Plan also lacks a strong historic environment evidence base.
 - We strongly recommend that further evidence is gathered such as a Historic Environment Chapter within the Borough profile or as a standalone document. Evidence base should include both above and below ground heritage assets, as well as historic landscapes. However, with a local plan we would expect to see a comprehensive and robust evidence base.
 - Detailed historic characterization work assessing impact of specific Heritage Impact Assessments looking into significance and Green Belt Visual impact Archaeological assessments.

- Monitoring by indicators to measure how successful historic environment policies are, including preparation of a local list, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk.
 - Glossary - Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. These would typically include: Listed Buildings Scheduled Monuments Conservation Areas Registered Parks and Gardens Registered Battlefields Protected Wrecks Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings
 - Mapping We recommend that designated heritage assets are marked on maps, where appropriate.
 - DBC encouraged to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups when drawing up the emerging Plan.
- Thames Water Utilities – Generally supportive. Mention within the consultation document to the requirement for the provision of necessary infrastructure, including sewerage infrastructure, alongside development was welcomed. Emphasised need for emerging Plan to take into account infrastructure and water environment impact of new development. Specific points were:
 - Thames Water keen to maintain dialogue with DBC and neighbouring authorities to discuss the impact of proposed development.
 - Planning policies supported that seek to maximise the use of sustainable drainage measures and which seek to maximise the water efficiency of new development in order to mitigate impact upon infrastructure and water environment.
 - Thames Water has limited powers to prevent connection to its network ahead of infrastructure upgrades and therefore relies heavily on the planning system to ensure infrastructure upgrades are provided ahead of development either through Local Plan Policies or the use of appropriately worded ‘Grampian style’ planning conditions.
 - Suggested policy wording and supporting text to go in emerging Plan to achieve the above (dealt with in Q 14 of IO Consultation)
- St Albans City and District – Issues over use of title of Gorhambury for East Hemel development and reference to land allocation in the consultation:
 - Title of ‘Gorhambury’ given in some parts of the document for East Hemel development is not helpful as it is the name of an historic house and a much wider estate just outside St Albans. Ongoing use of the name ‘Gorhambury’ causes confusion to local residents and Members. Area should be referred to as East Hemel Hempstead.
 - The wording of the ‘box’ on Page 37; ‘What about the Gorhambury Land at East Hemel Hempstead?’ and in Appendix C is surprising given the DtC context. The references to ‘the final decision will

obviously affect how much land we will need to allocate in our own area' seems unfortunately worded.

- Hertfordshire County Council (Public Health) - Keen to see development that promotes health and wellbeing through positive planning and high quality design.
 - o Attention drawn to the 2017 Public Health England Spatial Planning for Health evidence resource for planning and designing healthier places.
 - o Giving consideration to Herts CC health and wellbeing planning guidance and undertaking a Health Impact Assessment on your local plan would be key steps to take in ensuring the Local Plan is health-proofed for the future.
 - o Dacorum's Population Health: Building health into planning seeks to address some of the causes of poor health from the outset and a Local Plan should take an approach in its policy setting that balances provisions for a positive, healthy environment alongside provision of health care facilities.

General comments (NOT statutory consultee) made and not already covered above included:

- The Plan benefits already wealthy land owners and is developer (profit driven) demand led.
- Measures to ensure that all homes are in fact occupied should be taken and more done to encourage mixed use living and retail or commercial use.
- Evidence base questioned as to the numbers and type of homes required.
- The previous county and district plans support the preservation of communities and green belt between conurbations as clear priority, this proposal destroys the previous work to protect it
- With a planned increase in the number of homes and population, the IDP needs to be more often referred to so that we can better understand how the planned development will be sustainable through-out the development process.
- Consultation treats Tring and Berkhamsted as 'secondary' to Hemel Hempstead.
- Option 1a of the consultation preferred.
- Parking congestion and number of spaces to be provided remains a constant theme.
- BRAG's response raised a large number of issues, most of which are covered in other questions, those more pertinent to this question were primarily based on concerns over intrusion into the Green belt and perceived overdevelopment:
 - o The list of suggested policies for the new Local Plan needs to be fleshed out before sites can be judged against them Highways – LTP needs to be published to analyse in detail any proposals. Flooding – SFRA not completed

- The Urban Design Assessment (UDA) sets out a range of principles that will guide development in the town and protect its character such as appropriate forms and densities of housing development, including housing types and building heights.
 - Economic prosperity - A compact (town) centre needs to be maintained with a lively range of uses
- To ensure sustainability of the area requires employable residents, local job opportunities, affordable and appropriate housing, efficient transport systems and good community spirit.
- Large Green Belt releases around the market towns means that the Settlement Hierarchy will have been abandoned.
- Welcome review of the Green Belt boundaries in order to identify further land for development. However, the approach taken to assessing parcels against the objective to 'preserve of the setting of historic towns' is inconsistent with national policy. Wholly inappropriate to consider a "local purpose" of the Green Belt. The purposes of Green Belt are established in national policy and LPAs should not seek to add to these to take account of local considerations (Home Builders Federation).
- Paragraph 86 of the NPPF is clear that villages should only be included within the Green Belt where they make an important contribution to its openness. This can potentially unlock smaller sites in these villages. Also, when defining village boundaries, new development in villages can support the long-term sustainability of many local services in villages and a more considered boundary can support a more appropriate response to new development (Home Builders Federation).
- St William Homes LLP ('St William') generally supportive:
 - Supports DBC's approach in preparing a full new Local Plan rather than piecemeal updates and supports the rationale, general direction and intention of the document.
 - In certain areas, the new Local Plan is unduly prescriptive and that further flexibility should be included to allow for design, mix and affordable housing tenure to be determined on a site-by-site basis
- New housing should only be developed alongside expanded and appropriate sporting facilities that will cater adequately for any additional population. (Tring Hockey Club)
- Keir Homes commented upon the following areas:
 - Windfall sites - Lack of up to date evidence on which to assess the identified housing supply. 2015 SHLAA identified capacity for 14,500 homes, however, the bulk of the sites identified (I&O p.46) were on sites that would conflict with DBC planning policies, being on greenfield sites on the edge of towns or villages, or in the wider countryside. DBC is yet to identify the extent to which it intends to rely on windfall sites for a contribution towards supply. Due to Windfall sites unpredictability, limited reliance should be had on their contribution to supply.
 - We agree with DBC that vacant properties form an important part of the overall approach.

- Support provision of homes through the conversion of underutilised employment land and increasing building heights & densities.
- Out of the stated capacity to deliver 10,940 homes across the plan period 1,257 have already been built out between 2013-2016 so those should be disregarded and the identified supply should be reduced to 9,683. Questioned prospect of achieving the full capacity and the identified supply should be more rigorously assessed. The sources of housing supply currently identified by DBC, should be reviewed, and potentially reduced before progressing with the next iteration of the new Local Plan.
- Hemel Hempstead Labour Constituency Party is broadly supportive:
 - In summary, we would like to see:
 - Greater granularity of the need for and type of new dwellings across the DBC area;
 - A commitment to maintain quality and safety standards for all new-builds;
 - Adequate commitment to Affordable and Social Housing across the borough based on a meaningful local definition for Dacorum;
 - Adequate provision and integration (with other projected developments) of local infrastructure/amenities, such as schools, health facilities, roads, cycleways and transport.
- Responses from Hunters Park, Ivy House Lane & Meadway (Berkhamsted) residents included:
 - Lessons should be learned from poor historical decisions and future infrastructure and house building investment, particularly in capacity constrained market towns, should be coordinated on a timely basis.
 - Current studies undertaken by DBC are superficial, biased and inadequate and that sustainability issues could be better addressed with less impact on the Green Belt.
 - The TRL report cannot be relied on as it is too superficial. The existing proposals are a paste up of an undirected Call for Sites and a weak assessment regime that offers restricted choices in the Issues and Options Assessment.

Sites put forward

Residents (particularly in Berkhamsted and to a lesser extent in Tring) favoured option 1a and felt that more consideration should be given to available urban capacity in Hemel Hempstead to reduce demand on the Green belt
