



Pre-Submission Site Allocations Report of Representations

Part 2

Contains:

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

Addendum – Focused Changes

January 2016

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

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

Obtaining this information in other formats:

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

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

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PART 2 (this document)

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

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

Note: Includes both supporting and objecting comments.

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
737184	Mr Tim Noden	Planning Manager Harrow Estates	868800	Mrs Sam Ryan	Director Turley Estates
56252	Mr Tom Gilbert-Wooldridge	Principal Historic Environment Planning Advisor Historic England			
928457	Mrs Donna Lee				
868535	Mr Guy Moores				
868695	Mr Simon Vince	Heathrow Airport Limited			
928079	Ms Ann Hetherington				
928656	Mr Michael Devlin	Chair Grovehill Future Neighbourhood Forum			
400454	Mr Claude Honey				
772477	Mr. Roy Warren	Planning Manager Sport England			
926372	Mr Michael Nidd				
864135	Mrs Laurie Eagling	Clerk Pitstone Parish Council			
775876	Mr Henry Wallis				
863317	Mr John Allan				
928638	Lorna Topkaya		928570	Mr James Holmes	Associate Director Aitchison Raffety Ltd
924793	Mr David Stanier				
928639	Mr and Mrs Lowe		928570	Mr James Holmes	Associate Director Aitchison Raffety Ltd
928640	Mr and Mrs Armstrong		928570	Mr James Holmes	Associate Director Aitchison Raffety Ltd
929129	Mrs Jane Lofty				
864722	Miss Jenefer Rainnie				
607346	DEF Dacorum Environmental Forum	Steering Group Dacorum Borough Council			
928721	Mr John Hislam	Treasurer Bovingdon & District Horticultural Society			

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
864717	Mrs Kate Harwood	Conservation & Planning Officer Hertfordshire Gardens Trust			
928771	Ms Louise Dale	Assistant Safeguarding Officer Ministry of Defence			
770860	Mrs Heather Ebdon				
928776	Ms Julia Coulson	Hertfordshire Sustainability Forum & Local Nature Partnership Coordinator East Herts Council			
610088	Mr Martin Hicks	Ecology Officer Hertfordshire County Council			
929201	The English Sangha Trust Ltd	The English Sangha Trust Ltd	929200	Ms Tabitha Lythe	Rolfe Judd Ltd
775883	Mrs Carolyn Wallis				
489516	Mr Christopher Allen	Hon. Secretary Tring Sports Forum			
929236	Mr Alex Francis	Area Manager Hertfordshire Homes & Community Agency			
485861	Mr Cornelius Nicoll				
929127	Mr Simon Andrews				
868541	Mr Michael Curry	Town Clerk Tring Town Council			
929629	Ms Lucy Murfett	Planning Officer The Chilterns Conservation Board			
611329	Mr Derek Proctor				
627495	Mr Nigel Agg	Strategic Planning Director TAYLOR WIMPEY UK LTD	210999	Mr Martin Friend	Director Vincent & Gorbng
870398	Mr Nick Ingle				
211594	Ms Greta Brown	Planning Field Officer Chiltern Society			
498429	Steve Baker	CPRE - The Hertfordshire Society			
865138	Mrs Anne Lyne				
620494	Mrs Jeanette Corfield				
329628		Mccarthy & Stone Retirement Lifestyles Ltd	929207	Mr Ziyad Thomas	The Planning Bureau Ltd
211068	Mr Nick Harper	The Crown Estate	648734	Mr Clive Harridge	AMEC
404124	Mr Philip Marks				
211660	Mr Garrick Stevens	Berkhamsted Town Council			
929631	Mr Peter Vallis	W Lamb Ltd	868494	Miss Julia Mountford	Boyer Planning

Person ID	Full Name	Organisation Details	Person ID	Full Name	Organisation Details
398892	Mr James Honour				
929656	Mr James Horgan	CBRE Global Investors	929635	Ms Jennifer Liu	Senior Planner CBRE
688623	Natasha Smith	Planning Advisor Environment Agency			
398533	Mr Stuart Wisely				
609834	Mrs Karen Smith				
494131	Mr Michael Emett	Strategic Land Director CALA Homes	743732	Mr Simon Prescott	Barton Willmore
874969	Techno Limited	Techno Limited	874968	Miss Wakako Hirose	Rapleys LLP
875694	Albion Land Ltd	Albion Land Ltd	875692	Miss Hannah Smith	Quod
868582	Mr John Monk		868581	Mr Michael Townsend	Townsend Planning Consultants
777070	Mr Lee Royal		777069	West Hemel Action Group WHAG	
928571	Simon Foster		928570	Mr James Holmes	Associate Director Aitchison Raffety Ltd
929214	Mrs Lisa Probyn	Linden Homes / Crest Nicholson	490519	Miss Nicola Broderick	NMB Planning Ltd
929664	Macdonald Hotels	Macdonald Hotels	871198	Mr Sebastian Tibenham	Director Pegasus Group
928780	Tesco Pension Trustee Ltd c/o Ediston Properties Ltd	c/o Ediston Properties Ltd Tesco Pension Trustee Ltd	928781	Mr Alex Mitchell	Zander Planning Ltd

Table 2: Number of Representations Considered

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

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

Site Allocations Reference		Number of Representations								
		Total received	Total in support	Total objecting	Objections					Comments ²
					Saying the Site Allocations is					
					not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
PART A										
Text: 1.1-1.22	MC1	-	-	-	-	-	-	-	-	-
	MC2	1	1	0	0	0	0	0	0	1
PART B										
THE SUSTAINABLE DEVELOPMENT STRATEGY										
2. Promoting Sustainable Development										
Policies Map showing changes to Green Belt boundaries	SC1	5	0	5	0	5	3	2	3	5
Schedule of Major Developed Sites	SC2	1	0	1	0	1	1	1	1	1
	SC3	-	-	-	-	-	-	-	-	-
	SC4	1	-	1	0	1	1	1	1	1
Schedule of Mixed Use Proposals and Sites	MC3	-	-	-	-	-	-	-	-	-
	MC4	-	-	-	-	-	-	-	-	-
	MC5	-	-	-	-	-	-	-	-	-
	MC6	-	-	-	-	-	-	-	-	-
	MC7	-	-	-	-	-	-	-	-	-
	MC8	1	1	0	0	0	0	0	0	1
	MC9	-	-	-	-	-	-	-	-	-
	MC10	1	1	0	0	0	0	0	0	1
	MC11	2	0	2	0	1	0	0	0	2
3. Enabling Convenient Access between Homes, Jobs and Facilities										
Text: 3.1-3.9	MC12	3	1	2	0	2	0	0	0	3
Policy SA3	MC13	-	-	-	-	-	-	-	-	-
Schedule of Transport Proposals and Sites	MC14	-	-	-	-	-	-	-	-	-
	MC15	-	-	-	-	-	-	-	-	-
STRENGTHENING ECONOMIC PROSPERITY										
4. Providing for Offices, Industry, Storage and Distribution										
Policy SA6	SC5	-	-	-	-	-	-	-	-	-

Site Allocations Reference		Number of Representations								
		Total received	Total in support	Total objecting	Objections					Comments ²
					Saying the Site Allocations is					
					not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
5. Supporting Retailing and Commerce										
Schedule of Retail Proposals and Sites	SC6	2	1	1	0	1	1	0	0	2
PROVIDING HOME AND COMMUNITY SERVICES										
6. Providing Homes										
Policy LA1	MC16	3	1	2	0	2	1	2	2	2
	MC17	2	1	1	0	1	0	1	1	1
	MC18	-	-	-	-	-	-	-	-	-
	MC19	1	0	1	0	1	0	1	0	0
	MC20	-	-	-	-	-	-	-	-	-
Policy LA2	MC21	3	1	2	0	2	2	0	0	3
	MC22	2	0	2	0	2	2	0	0	2
Policy LA3	MC23	4	0	4	2	4	4	2	2	4
	MC24	5	1	4	2	4	1	4	2	5
	MC25	1	0	1	0	1	1	0	0	1
	MC26	3	0	3	0	3	0	3	0	3
Policy LA4	MC27	1	1	0	0	0	0	0	0	1
	MC28	1	0	1	0	1	0	1	1	1
	MC29	-	-	-	-	-	-	-	-	-
Policy LA5	MC30	-	-	-	-	-	-	-	-	-
	SC7	9	1	8	2	9	4	3	5	9
	MC31	2	0	2	0	2	1	1	0	2
	MC32	1	0	0	0	1	0	0	0	1
	MC33	1	0	0	0	1	0	0	0	1
	SC8	1	0	1	0	1	1	1	1	1
	MC34	-	-	-	-	-	-	-	-	-
	MC35	-	-	-	-	-	-	-	-	-
Policy LA6	MC36	-	-	-	-	-	-	-	-	-
	MC37	-	-	-	-	-	-	-	-	-
	MC38	-	-	-	-	-	-	-	-	-
Schedule of Housing Proposals and Sites	MC39	-	-	-	-	-	-	-	-	-
	MC40	-	-	-	-	-	-	-	-	-
	MC41	-	-	-	-	-	-	-	-	-
	MC42	-	-	-	-	-	-	-	-	-
	MC43	-	-	-	-	-	-	-	-	-
	MC44	-	-	-	-	-	-	-	-	-
	MC45	-	-	-	-	-	-	-	-	-
	MC46	-	-	-	-	-	-	-	-	-
MC47	1	1	0	0	0	0	0	0	1	

Site Allocations Reference	Number of Representations									
	Total received	Total in support	Total objecting	Objections					Comments ²	
				Saying the Site Allocations is						
				not legally compliant	not sound	not justified	not effective	inconsistent with national policy		
MC48	1	1	0	0	0	0	0	0	1	
MC49	-	-	-	-	-	-	-	-	-	
MC50	-	-	-	-	-	-	-	-	-	
MC51	-	-	-	-	-	-	-	-	-	
MC52	-	-	-	-	-	-	-	-	-	
MC53	-	-	-	-	-	-	-	-	-	
MC54	-	-	-	-	-	-	-	-	-	
MC55	-	-	-	-	-	-	-	-	-	
MC56	1	0	1	0	1	0	1	0	1	
MC57	-	-	-	-	-	-	-	-	-	
MC58	1	1	0	0	0	0	0	0	1	
MC59	1	1	0	0	0	0	0	0	1	
7. Meeting Community Needs										
Text: 7.4-7.11										
	MC60	2	0	2	2	2	0	0	0	2
	MC61	2	0	2	0	2	0	2	0	2
Policy SA10	SC9	1	1	0	0	0	0	0	0	1
Education Zones on Policies Map	MC62	-	-	-	-	-	-	-	-	-
Schedule of Social and Community Proposals and Sites	MC63	1	0	1	0	1	1	0	1	1
	MC64	1	0	1	0	1	1	1	0	1
Policies Map	MC65	-	-	-	-	-	-	-	-	-
	MC66	-	-	-	-	-	-	-	-	-
Text: 7.12-7.16	MC67	-	-	-	-	-	-	-	-	-
Schedule of Leisure Proposals and Sites	MC68	2	0	2	1	1	1	0	0	2
	SC10	7	1	6	1	6	2	3	2	6
Policies Map	SC11	-	-	-	-	-	-	-	-	-
	SC12	6	1	5	1	5	5	5	4	6
LOOKING AFTER THE NATURAL ENVIRONMENT										
8. Enhancing the Natural Environment										
Policies Map	MC69	-	-	-	-	-	-	-	-	-
9. Conserving the Historic Environment										
Policies Map	SC13	-	-	-	-	-	-	-	-	-
PART C										
IMPLEMENTATION AND DELIVERY										
PART D										

Site Allocations Reference		Number of Representations								Comments ²
		Total received	Total in support	Total objecting	Objections					
					Saying the Site Allocations is					
					not legally compliant	not sound	not justified	not effective	inconsistent with national policy	
Appendices										
Appendix 3	MC70	-	-	-	-	-	-	-	-	-
	MC71	-	-	-	-	-	-	-	-	-
Appendix 5	MC72	-	-	-	-	-	-	-	-	-
Total comments on Focused Changes		84	18	66						80
General Comments		21								
TOTAL COMMENTS		105								

Table 3: Main Issues Raised and Council's Response

Notes:

- This provides a synopsis of the main issues raised through the representations and the Council's response to these. Its primary focus is therefore upon objections rather than statements of support.
- The grey shading in the column entitled 'New / Significant' denotes if the issue has not been explicitly raised before: either through the Core Strategy process or earlier consultation on the Site Allocations DPD.
- The 'S' in the 'New / Significant' column denotes if as well as a new issues, it is also considered to be a significant issue that has required particularly careful consideration.
- The reference in the 'Amendment Required' column relates to changes shown in Table 4.
- If the number of representations received (either in support or objection) does not tally with the number of issues summarised, this is either due to more than one person / organisation raising the same general points, or no reasons being given.

Focussed Change SC1			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 4			
Key organisations	1		
Individuals	2		
Landowners	1		
Total	4		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
In changing the Green Belt status to accommodate a Traveller Site, Dacorum Borough Council is acting contrary to the latest Government planning policy for traveller sites. No exceptional circumstances have been set out to justify the proposed release.		No change. By amending the Green Belt boundary as now proposed, the Council will ensure that it is a permanent long-term boundary, delineating the built elements of the site, from the area of open space at LA5. This accords with both national guidance in the NPPF. See previous responses to issue in Report of Representations for Pre-Submission Site Allocations (July 2015) and associated Cabinet Reports. See also response to comments on SC7.	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	
Individuals			
<i>Individuals who disagreed made the following comments:</i>			

More land has been taken from the Green Belt for the cemetery and traveller site.		No change. By amending the Green Belt boundary as now proposed, the Council will ensure that it is a permanent long-term boundary, delineating the built elements of the site, from the area of open space at LA5. This accords with both national guidance in the NPPF and reflects the implications of the recent High Court decision relating to the treatment of cemeteries in the Green Belt, as set out in the Report of Representations relating to the Pre-Submission Site Allocations stage (July 2015).	No
Removal of land from the Green Belt is contrary to national policy.			
<i>Individuals who agreed made the following comments:</i>			
-		N/A	
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
The new proposed Green Belt boundary is not compliant with the objectives of the Core Strategy or with national policy. Core Strategy Policy LA5 identifies as one of the principles of delivery of the Local Allocation: “...secure a defensible long term Green Belt boundary.” 2.4 Paragraph 84 of the NPPF outlines a similar objective, stating: “...authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”.		No change. By amending the Green Belt boundary as now proposed, the Council will ensure that it is a permanent long-term boundary, delineating the built elements of the site, from the area of open space at LA5. This accords with both national guidance in the NPPF and reflects the implications of the recent High Court decision relating to the treatment of cemeteries in the Green Belt, as set out in the Report of Representations relating to the Pre-Submission Site Allocations stage. The Council's Core Strategy indicated the location of the Green Belt releases only: it did not formally delineate these. This has correctly been left to the Site Allocations DPD to establish. There is therefore no issue of inconsistency between the two elements of the Council's Local Planning Framework.	
<i>Landowners who agreed made the following comments:</i>			
-		N/A	

Focussed Change SC2	
Number of people/organisations responding	
Supporting - 0	
Key organisations	0
Individuals	0
Landowners	0
Total	0
Objecting - 1	
Key organisations	0
Individuals	0
Landowners	1
Total	1

Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
Objection to the lack of extensive review of potential MDS sites and thereby the lack of inclusion of other potential MDS sites under the proposed change to Policy SA2. The Bobsleigh Hotel site should be reconsidered for designation as an MDS under policy SA2 in light of the new and additional information provided as it is considered that it would fully meet the identified tests and policy principles.		No change. This is a reiteration of previous representations submitted regarding this site. It does not relate to Focused Change SC2 per se. The previous response agreed by the Council to this issues remains valid: “There are lots of developed sites in the Green Belt which are not designated as Major Developed Sites. The MDS approach has been applied sensibly and logically. In addition to meeting the criteria set out in para 8.31 of the Core Strategy, redevelopment or infilling of MDs should also help secure economic prosperity or achieve social objectives or environmental improvements. The Council do not consider that strong justification has been provided for designating the Bobsleigh Hotel as a MDS; the Bobsleigh is not a particularly significant site locally, nor is it of a particularly large scale. The future expansion or redevelopment of the existing hotel can also take place in accordance with existing Green Belt policy.”	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change SC4	
Number of people/organisations responding	
Supporting - 0	
Key organisations	0

Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
In relation to MDS/8 – paragraph 4.12 should be amended to read: Bourne End Mills and Bovingdon Brickworks are identified as both Major Developed Sites in the Green Belt (see Policy SA2 and associated schedule) and Employment Areas in the Green Belt. Redevelopment or limited infilling of these sites may help support the local economy <u>meet the development needs of the local area</u> and deliver environmental improvements. Policy SA6 should be amended to read: Employment areas in the Green Belt are shown on the Policies Map. Within these areas, the range of employment generating uses set out in the table below will be retained <u>where practical. Development for non employment uses will be permitted where they are required to</u>		No change. The same objector made representations with regard to Policy SA6 at the Pre-Submission stage. These representations requested the Council to amend the boundary of the Employment Area in the Green Belt at Bourne End Mills to include the former area of open storage in the south west part of the site. This change, and an associated change to the Major Developed Site boundary, were made via Focused Changes SC4 and SC5. Neither Policy SA6 itself, nor paragraph 4.12 which are now the subject of further representations, have been amended through the Focused Changes: the text remains as set out in the original Pre-Submission document. This new representation is therefore not duly made. No objections have previously been raised to their wording. The role of Bourne End Mill site is to provide employment land – as reflected as its designation as an employment Area in the Green Belt under Policy SA6. It is therefore appropriate for the supporting text to refer to the area's role in supporting the local economy, rather than widening this to refer more generally to the development needs of the local area. Any alternative or additional uses on the site would need to be justified as a potential exception to policy,	No

<u>make employment development viable and to ensure the delivery of environmental improvements.</u>		provided it can be demonstrated it is required to enable the redevelopment of the wider site for employment uses (as per its designation) and deliver other environmental benefits.	
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change SC6			
Number of people/organisations responding			
Supporting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	1		
Objecting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			

<i>Landowners who disagreed made the following comments:</i>			
The proposed approximate retail floorspace figure of 7,000sqm is not justified as it is not in line with the Core Strategy, nor does it maximise the use of the site. There is sufficient evidence available to support an indicative floorspace estimate of 10,000sq.m in preference to 7,000sq.m.		Change required. The Council accepts that the justification for the 7,000sqm has been weakened with the expiration of the planning permission for retail use on the site which was in existence at the time of writing the Core Strategy and the Pre-Submission Site Allocations DPD. However, it does not consider that there is sufficient evidence to justify a retail floorspace figure of 10,000sqm. The planning requirements will be amended to reflect the need to balance maximising the use of the site with protecting the town centre from harmful impact.	Yes
There is a requirement to also change Table 1 on page 45. Jarman Fields is referred to as an out of centre retail and leisure location. Under 'Main Uses' it is stated 'food retailing and bulky non-food goods. Leisure uses'. As a result of the Focused change for Proposal S/1, the description of the 'Main Uses' in Table 1 also requires to change to remove the term 'bulky'.		No change. Table 1 has not been amended through the Focused Changes: the text remains as set out in the original Pre-Submission document. The same issue regarding Table 1 was raised during the Pre-Submission consultation. See the Council's response in the Report of Representations on the Pre-Submission Site Allocations (July 2015).	No
<i>Landowners who agreed made the following comments:</i>			No
The approach is in accordance with the NPPF, which advises that Local Plans should set out clear policies on what will or will not be permitted and where.		No change. Support noted and welcomed.	No
There is sufficient flexibility by including leisure uses in the acceptable uses, as such uses may be appropriate in a mixed retail-led scheme.		No change. Support noted and welcomed.	No
The Council's Retail Study Update (2011) which forms part of its evidence base shows a significant retail comparison goods capacity over the plan period. It also recognises that the existing out of centre retail provision is overtrading in 2016 and beyond and retail development at the subject site would act to address this overtrading.		No change. Support noted and welcomed.	No
The proposed site will ensure a contribution to economic growth of the wider Jarman Fields area and the Borough is secured in the future.		No change. Support noted and welcomed.	No

Focussed Change SC7	
Number of people/organisations responding	
Supporting - 1	
Key organisations	
Individuals	1
Landowners	
Total	1
Objecting - 8	
Key organisations	3
Individuals	3
Landowners	2
Total	8

Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
<p>No recognition has been given to the likely impacts on the nationally protected Chilterns AONB that would arise from the proposals.</p> <p>Amend the text of the allocation to refer to the Chilterns AONB and what the likely implications are (the majority of the site is within the setting of the AONB and part of the site is within the AONB).</p>		<p>No change. These issues have all previously been raised through representations to the Pre-Submission Site Allocations DPD. The responses to these issues are contained in the Report of Representations relating to the Pre-Submission Site Allocations (July 2015) and remain unchanged.</p> <p>It is important to note that none of the amendments set out in the Focused Changes consultation change the extent or nature of development proposed on the ground. The changes now set out relate solely to the identification of a policy boundary (the Green Belt) and show the Gypsy and Traveller site as a defined proposal, rather than a broad location indicated by a symbol on the map. The number of homes and Gypsy and Traveller pitches remain unchanged, as does the extent and level of open space and employment land on the site. The apparent reduction in the amount of open space referred to as a result of Focused Change SC7 (from 6.5 to 6.1 hectares) is a result of taking the amount of land required for the Gypsy and Traveller site out of this overall figure. The Gypsy and Traveller site was originally included within the open space figure, which with hindsight gave an incorrect impression of the extent of this area.</p> <p>The AONB boundary is clearly shown on the Policies Map and maps within associated LA5 masterplan. It is also referred to in text in appropriate places. It is therefore not considered necessary to show it on the Indicative Spatial Layout map within Policy LA5 (see responses relating to Focused Change SC8 below).</p> <p>For a full response to other issues raised please refer to relevant sections of Report of Representations relating to the Pre-Submission Site Allocations (July 2015).</p>	No
<p>The Chilterns AONB and its boundary have not been clearly annotated on all plans to ensure that all readers of the associated documents are aware of what is being proposed and where.</p> <p>Include the AONB and its boundary on all plans and maps associated with the proposed allocation.</p>			
<p>The increase in the number of dwellings appears to have led to some elements of the proposed development being pushed out of the main developable area, without any justification for this action being given and without any consideration of the likely implications for the Chilterns AONB.</p>			
<p>Reduce the number of dwellings on the site to a level that will ensure that no developments are proposed within the Chilterns AONB and will allow: an extension to the cemetery in line with the Concept Masterplan Option 1 (immediately to the north and west of the existing cemetery).</p>			
<p>The NEAP to be placed within the development area where it would be more likely to be used; the traveller site (if still required following an update of Traveller Needs Assessment) to be identified as part of the development area which would be consistent with the other proposed allocation sites, and an extension to the proposed employment allocation that would be more worthwhile.</p>			
<p>None of the proposed developments that have been identified within the Chilterns AONB (cemetery, play area and traveller site) would conserve or enhance the natural beauty of the Chilterns AONB and these elements are therefore contrary to national planning policy, the Chilterns AONB Management Plan and the Council's own development plan.</p>			
<p>The proposed open space is unlikely to be used to any great extent unless it is much more formal in nature (playing pitches for example) and such a change in use would neither conserve nor enhance the natural beauty of the AONB.</p>			
<p>The employment allocation that has been made appears to be too</p>			

small to be worthwhile.			
The allocation of a traveller site remote from the main developable area is inconsistent when compared to the other allocations that also include such provision (in each case the traveller site is clearly identified within the development area).			
The proposed cemetery extension is not an extension to the main site because it is remote from the main site. As it is removed from the main cemetery the Board considers that its use would ultimately lead to demands for car parking and ancillary buildings which would not be appropriate within the Chilterns AONB.			
Ensure that the text of the document is explicit that the western fields should only ever be used for informal open space or left in agricultural use.			
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Recent Government policy states that it is inappropriate to put gypsy and traveller sites in the Green Belt.		<p>No change. This is an over-simplification of national Government policy relating to Gypsy and Traveller provision. The Council considers its approach to Gypsy and Traveller provision remains appropriate and reflects Government guidance for these reasons set out in the Cabinet Report on the Focused Changes. In summary it is important to recognise that with regard to requirements for the Council's plan-making activities, the majority of the text in the revised 'Planning Policy for Traveller Sites' (PPTS) remains the same as for the previous 2012 document. The Council's obligations regarding making appropriate provision for Gypsies and Travellers have not changed:</p> <ul style="list-style-type: none"> • Paragraph 9: local planning authorities should set pitch targets for gypsies and travellers which address the likely need for such accommodation. • Paragraph 10: Local planning authorities should, in producing their Local Plan, identify sites to meet their locally set targets. • Paragraph 17: Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only. • The requirement to be able to demonstrate a 5 year supply of deliverable sites. <p>The policy has been tightened with regard to the treatment of speculative applications for sites in the Green Belt – but this section of the PPTS does not apply to the plan making process i.e. to the Council's Site Allocations DPD.</p> <p>Whilst the Council's preference would have been to find sites for new provision outside of the Green Belt (and ideally on brownfield land), such sites are not available. It is also the Council's view that providing sites as part of larger scale housing development is an appropriate and robust approach that will help aid integration of the two communities. For further explanation regarding the site search process and the reasons for the approach please refer to the Homes and Community Facilities Background Issues Paper.</p>	No

The traveller site is still included despite Town Council objections		No change. The Town Council's objection to inclusion of the site is noted. The principle of locating a site as part of the LA5 development has not been altered by any of the Focused Changes. See Report of Representations for the Pre-Submission Site Allocations (July 2015) and response above.	No
Removal of land from Green Belt is contrary to the opinions many people expressed locally.		No change. This is a general objection to the removal of land from the Green Belt to accommodate development. The principle of designating the Local Allocations was established in the Core Strategy. The role of the Site Allocations DPD is to define detailed boundaries and development requirements for the sites. Local opposition to Green Belt releases has previously been reported and responded to. See Report of Representations for the Pre-Submission Site Allocations (July 2015)	No
<i>Individuals who agreed made the following comments:</i>			
Support – however the extension to the cemetery should be specified as Woodland, which is the formally expressed wish of Tring Town Council and in keeping with an AONB area. The wording should be amended to: “ A woodland extension to the cemetery of around 1.6 hectares, in the western fields, and also except for car parking and associated facilities for the cemetery which will be provided in the eastern fields development area. ”		No change. General support noted and welcomed. The minor wording changes suggested are not considered to be appropriate. The intention has always been, and continues to be to provide a cemetery extension within a ‘woodland’ landscape feature to be in keeping with the AONB. However, due to the continuing demand for traditional burials, not all burials would be woodland or ‘green’ burials on this site, and so it would be misleading to imply that the whole site would all be planted with trees. The area is expected to have more of the character of parkland i.e. to be a mixture of trees with open clearings in the centre. The wording currently drafted makes clear that any car parking area to serve the cemetery is within the ‘developed’ part of the site i.e. the eastern fields section, rather than the western fields section (as suggested by the Town Council by their proposed wording change).	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
The proposed changes to the boundary of the Green Belt west of Tring to include both the extension to the cemetery and the Traveller Site as part of the LA5 allocation are inappropriate development in the Green Belt; for cemeteries this was confirmed in the Court of Appeal decision in the Gedling case referred to in full comments submitted. DCLG's recent policy advice make clear that traveller sites in the Green Belt should only be altered in exceptional circumstances to accommodate them.		No change. The reasons for this change are set out in the Report of Representations on the Pre-Submission Site Allocations DPD and associated Cabinet Report and remain unchanged. The key reason for the proposed change to the Green Belt boundary (as set out in Focused Change SC7 and SC8) was to reflect the Court of Appeal decision referred to: as this made it clear that a cemetery of the nature proposed at LA5 would not fall under the definition of ‘appropriate development’ in the Green Belt. Whilst the Council is satisfied that there would be sufficient reasons to justify a policy exception in this instance, it is considered prudent to remove the site from the Green Belt as the opportunity was available through the Site Allocations DPD and at the same time to remove the Gypsy and Traveller site. This approach has been advocated by the Council's legal advisers. The Council is aware of the revised ‘Planning Policy for Traveller Sites’ (PPTS) issued on 31 August. With regard to requirements for the Council's plan-making activities, the majority of the text remains the same as for the previous 2012 document. It is important to note that the Council's obligations regarding making appropriate provision for Gypsies and Travellers have not changed. This includes the approach to altering Green Belt boundaries: <ul style="list-style-type: none"> • Paragraph 9: local planning authorities should set pitch targets for gypsies and travellers which address the likely need for such accommodation. • Paragraph 10: Local planning authorities should, in producing their Local Plan, identify sites to meet their locally set targets. • Paragraph 17: Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the 	No

		<p>development plan as a traveller site only.</p> <ul style="list-style-type: none"> The requirement to be able to demonstrate a 5 year supply of deliverable sites. <p>This advice has been followed and reflected in the Site Allocation DPD as amended by the Focused Changes.</p> <p>The changes in approach relating to the Green Belt relates to the treatment of applications for sites within the Green Belt - with a strengthening of powers to refuse such applications, plus the inclusion of a new sentence in paragraph 27 to indicate that a lack of pitches for Gypsies and Travellers is not a reason to grant planning permission for sites in the Green Belt and other protected areas. This requirement is in the section relating to determining applications (i.e. Development Management decisions), not the section on plan-making.</p>	
The wording of Policy LA5 should also be amended to allow greater flexibility by insertion of the words “at least” before the text “180-200 new homes”.		No change. The capacity of the site has not been amended via any of the proposed Focused Changes and the only objections received at the Pre-Submission Site Allocations stage related to the number of residential units being too high, rather than too low. The dwelling capacity for the site has already been increased from the 150 homes originally stated in the Core Strategy. The reason for this increase is set out in the Report of Representations for the Pre-Submission Site Allocations DPD. The current range of 180-200 units is considered appropriate and will enable an appropriate balance to be struck between making best use of land and enabling an appropriate residential layout that reflects the site's edge of town location and very close proximity to the Chilterns AONB. The precise number of dwellings will be considered and tested through the planning application process.	No
Policy SA9 should be deleted and, going forward, the provision of gypsy and traveller sites should then be dealt with in a separate standalone gypsy and traveller sites DPD based on an updated evidence base and proper consideration of reasonable alternatives.		No change. There is no overriding reason to prepare a separate DPD purely to address the provision of Gypsy and Traveller pitches within the Borough. The Site Allocations DPD is the delivery document for the Core Strategy and is therefore the appropriate document in which to address all aspects of dwelling provision. The appropriate time to reconsider Gypsy and Traveller needs is through the early partial review of the Core Strategy (being carried out as a new single Local Plan), which would necessitate a new Gypsy and Traveller Accommodation Assessment (GTAA) to be carried out.	No
If the Inspector does not wish to delay the allocation of travellers' sites, Policy SA9 should be modified to delete reference to a traveller site at LA5 and reallocate the pitches proposed at LA5 to other sites.		No change. The reasons for the allocation of a Travellers site as part of LA5 remain as set out in the Report of Representations to the Pre-Submission Site Allocation DPD and associated Homes and Community Facilities Background Issues Paper. As referred to in the Cabinet report relating to the Focused Changes, and in the responses set out above, the Council's legal adviser recommends that the approach to Gypsy and Traveller provision remains as previously agreed.	No
<p>The sentence stating that the site has been released from the Green Belt, 'except for the western fields open space' is ambiguously worded as this depends on the eventual extent of the open space. The wording should cross-refer instead to a specific boundary to be shown on the Proposals / Policies Map.</p> <p>In the event that site LA5 is released for development, the Policy should cross-refer to a Green Belt boundary as shown on the Proposals Map, not by reference to an area in a particular land use.</p>		No change. The Policies Map (as amended by the Focused Changes) clearly shows the area that would be released from the Green Belt and clearly delineates what land will be used for which purpose. A cross reference to the Policies Map is already included in the first sentence of Policy LA5.	No
No exceptional circumstances have been set out to justify the proposed release an even greater area of land from the Green Belt for residential development in the form of a permanent gypsies and travellers site, also in the AONB, contrary to the relevant policies in the NPPF.		No change. The identified need for Gypsies and Travellers and the lack of any alternative sites that do not fall within the Green Belt are considered to be sufficient evidence to justify the change now proposed to the Green Belt boundary at LA5. See Report of Representations on the Pre-Submission Site Allocations and associated Homes and Community Facilities Background Issues Paper for further explanation and justification of the Council's approach.	No
<i>Landowners who agreed made the following comments:</i>			

-		N/A	No
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Focussed Change SC8			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
The wording of Policy LA5 should also be amended to allow greater flexibility by insertion of the words "at least" before the text "180-200		No change. See response above regarding site capacity.	No

new homes”.			
Policy SA9 should be deleted and, going forward, the provision of gypsy and traveller sites should then be dealt with in a separate standalone gypsy and traveller sites DPD based on an updated evidence base and proper consideration of reasonable alternatives.		No change. See response above regarding Policy SA9.	No
If the Inspector does not wish to delay the allocation of travellers' sites, Policy SA9 should be modified to delete reference to a traveller site at LA5 and reallocate the pitches proposed at LA5 to other sites.		No change. See response above regarding Gypsy and Traveller provision at LA5.	No

Focussed Change SC9

Number of people/organisations responding	
Supporting - 1	
Key organisations	0
Individuals	0
Landowners	1
Total	1
Objecting - 0	
Key organisations	0
Individuals	0
Landowners	0
Total	0

Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			

-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	
<i>Landowners who agreed made the following comments:</i>			
Local Education Authority (Hertfordshire County Council) support the proposed additional wording.		No change. Support noted and welcomed.	No

Focussed Change SC10			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 6			
Key organisations	3		
Individuals	2		
Landowners	1		
Total	6		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
<p>The proposed amendment only references the school's requirements but it is important that community needs are referenced as community users will have different requirements to school users in terms of how they will use the site.</p> <p>The following revised wording at SC10 (Proposal L/4) is suggested:</p> <p><i>"Proposal linked to the future redevelopment of Tring Secondary School to make provisions for detached playing fields and to meet identified need for additional playing pitches for community use in Tring. The site should provide sufficient space for playing pitches for</i></p>		<p>No change. Whilst the designation is to facilitate the expansion of Tring School, in the event that additional playing pitches are required, it is appropriate to consider the potential dual use of the playing pitches for wider community use. The planning requirements for Proposal L/4 already refers to the fact that <i>'These playing pitches will also be made available for community use.'</i> This approach accords with the Policy CS23: Social Infrastructure. No further changes to the wording of the proposal are considered necessary to address this issue. The site is not considered appropriate for any indoor sports provision due to its location in the Green Belt.</p>	No

<p><i>outdoor sports in order to meet the school's requirements and Sport England standards; and could be jointly used and managed by the school and community sports clubs in Tring."</i></p>			
<p>The site will need to provide at least an equivalent area to the area that could potentially be lost on the Tring School site and should provide at least equivalent quality facilities to those that it would replace in terms of pitches and ancillary facilities.</p> <p>A suggestion for amending the policy is as follows:</p> <p><i>"Proposal linked to the potential future redevelopment of Tring Secondary School to make provision for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide playing pitches and appropriate ancillary facilities that are at least equivalent in quantity and quality to those that would potentially be lost at Tring School and should also meet the needs of the school and community users of the school's playing pitches. The site will need to provide appropriate ancillary facilities such as (but not limited to) changing rooms, equipment and maintenance storage facilities, car parking and vehicular access to ensure that the site is fit for purpose in terms of meeting the needs of school and community users. Playing pitches and ancillary facilities will need to be designed in accordance with Sport England's relevant design guidance to ensure that they are fit for purpose. The playing pitches and ancillary facilities will also be made available for community use. The playing fields should be completed or substantially progressed before any school expansion scheme has commenced at Tring School in order to ensure their delivery and continuity of provision for playing field users. It is anticipated that joint applications will be made to co-ordinate developments on the Tring School site and allocation L/4".</i></p>		<p>No change required. The designation is to facilitate the expansion of Tring School in the event that additional playing pitches are required and the extent of Proposal L/4, as illustrated on the Policies Map is based upon advice provided by the education authority (Hertfordshire County Council). The text proposed by Sport England is unnecessarily long and detailed. The existing text already refers to the need to meet the requirements of both the school and Sport England. It is appropriate for the proposal to be flexibly worded as the precise needs of the school are not known at the present time. Sport England would be consulted as part of any planning application relating to school expansion and the loss of existing sports provision on-site. If detached playing fields are required as a result of the schools' future expansion plans (which is not yet confirmed), then the Council would expect the delivery of L/4 to be linked to this wider application and reflect the school's needs at that point in time. A school expansion which significantly affected existing sports space is unlikely to be acceptable in planning terms if the detached playing fields were not provided.</p>	No
<p>While it has design guidance, Sport England does not have 'standards of provision' for playing fields so reference to this should be removed.</p>		<p>Change required. Change the reference to 'Sport England standards' to refer to meeting 'Sport England <u>guidance</u>.'</p>	Yes
<p>Explicit reference should be made in the planning requirements to playing pitches being supported by appropriate ancillary facilities such as changing, storage, maintenance and car parking facilities.</p>		<p>No change. This site is not intended to accommodate any built development or areas of hardstanding: although such development would not be deemed 'inappropriate' in the context of the NPPF. The site was chosen as a location for detached playing fields in part due to being in the ownership of Hertfordshire County Council and in part due to its relative proximity to the school, which would enable the children to walk to the playing fields. The designation is to facilitate the expansion of Tring School in the event that additional playing pitches are required,. The County Council has confirmed that there are no plans to provide any changing room or associated facilities as part of the proposal. It is therefore not necessary to refer to these as they are not an essential part of the proposal. Should any such facilities be required in the future, then a planning application would be considered in the context of Core Strategy Policy CS5: Green Belt, which reflects national planning policy relating to the Green Belt contained within the NPPF, or any subsequent relevant policies contained within any new Local Plan.</p>	No
<p>Reference should be made to the need to phase the delivery of the detached playing fields so that they are completed or at least at an advanced stage before any development starts on the school's playing fields. This is required to provide continuity of provision for existing school and community users and to accord with Government and</p>		<p>No change. See response above re wording of development requirements. As referred to above, should the detached playing fields be required in the event of the expansion of Tring School, a planning application will be required to be submitted to the local planning authority for consideration. This would normally include detail relating to the phasing of the development to ensure continuity in the provision of outdoor sports facilities for the school and</p>	No

Sport England playing fields policy.		community users.	
Reference should be made to the need to co-ordinate planning applications for expansion on the Tring School site and the detached playing fields on the Dunsley Farm site in order to ensure that development on both sites can be delivered as they are inter-dependent.			
It is important that the local hedgerows are not degraded as a result of these proposals and are in fact enhanced to retain the local ecological corridors currently present. The proposal should state: <i>'Their provision should also seek to conserve the local landscape character as far as possible by ensuring the hedgerow network is maintained and enhanced where appropriate and that the impact of potential floodlighting is properly addressed'.</i>		Change required. A reference to the maintenance of existing hedgerows and militating against the loss of any local ecological corridors is considered appropriate to add to the Planning Requirements. Whilst floodlighting is not proposed, if required it would be expected to comply with Policy CS32: Air, Soil and Water Quality of the Core Strategy and any relevant supplementary guidance.	Yes
In the case of a joint enterprise with the school, the Tring sports clubs would be able to bring their experience to management of the new site. Sole management by the school of a remote site could be problematic. The Playing Pitch Strategy and Action Plan emphasises that playing pitches that are significantly detached from others managed by any relevant local community club would not be usable nor sustainable. The most suitable site allocation for additional rugby/football pitches would therefore be to the west of Cow Lane alongside the existing rugby and football clubs.		No change. Management of the detached playing fields is not a matter for the Site Allocations DPD. However, as the site is principally to be used by Tring School, it would seem appropriate that it falls under their management. The County Council, as local education authority, agree with this approach. Management would however be a matter for future discussion between the School and other parties, including Tring Sports Forum, if and when the pitches are required. The location of the detached playing fields is considered to be the most appropriate in terms of serving the needs of Tring School, being within easy walking distance of the main school site. It is also deliverable – being in the ownership of Hertfordshire County Council, rather than a private landowner.	No
There may be potential issues with floodlighting.		No change. See response above.	No
<i>Organisations who agreed made the following comments:</i>			
The Town Council supports these changes to ensure adequate provision of sports facilities. Sport promotes good health and sense of community. Tring benefits from several successful sports clubs, with these changes would help perpetuate.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Need for new facilities not justified as no evidence has been submitted to demonstrate that any playing pitches would be required in the future.		No change. The County Council, as local education authority, has advised that should any future expansion of the school necessitate a loss of existing sports facilities, or warrant the provision of an increased level of pitches, then additional playing fields may be required. These will need to be detached from the main school site due to space constraints. The need to ensure the school continues to provide an appropriate level of outdoor sports facilities is also supported by Sport England. This need is referenced in the adopted Core Strategy, within paragraph 22.4 (Tring Settlement Strategy) stating that:	No

		<p><i>“Facilities for Tring School will need to be extended and additional, detached playing fields provided. The location of these new playing fields will be identified through the Site Allocations DPD: dual use will be sought.”</i></p> <p>The need for additional playing pitches is supported by evidence in the form of the Outdoor Leisure Facilities Study Assessment Report completed by the Council in 2014, and also within the follow-up Playing Pitch Strategy and Action Plan (2015). The Playing Pitch Strategy and Action Plan identifies the need for additional pitches within Tring as one of the nine high priority actions for the Borough, with particular reference to a shortfall in adult sized pitches required for senior rugby. It also specifically references the provision of detached playing fields at Dunsley Farm (linked with Tring Secondary School) as a potential new future site to help meet these shortfalls.</p>	
It would be harmful to the Green Belt. The provision of ancillary facilities such as changing, storage, maintenance and car parking facilities” would result in an urbanising and harmful impact on the openness of the Green Belt.		No change. No ancillary facilities are proposed as part of Proposal L/4 (see above response).	No
The proposed field is landlocked, as it does not adjoin any public land or highway. No details are provided as to how the proposed playing pitch would be accessed.		Change required. This issue has been discussed further with the Property team at Hertfordshire County Council, who, in liaison with the Children, Schools and Families team, originally advised on the location of this designation. There is currently footpath access to the site from the existing cricket pitch. As the County Council own the whole of the wider site, any formalisation of this existing footpath access, or the implementation of any new footpath access, would be under their control. However, it is considered appropriate to add a sentence to refer to this in the Planning Requirements section.	Yes
Concern over highway safety as it is likely that 30 school children at a time would regularly need to cross these busy roads to attend games lessons.		No change. See response above re consideration of access	
The proposed site is adjacent to existing residential properties at The Limes and Damask Close and concerns raised regarding impact on residential amenities could be adversely affected, including noise disturbance and light pollution.		<p>No change. The intention to accommodate detached playing fields in this location is a longstanding one. Paragraph 22.4 of the adopted Core Strategy (Tring Settlement Strategy) states that:</p> <p><i>“Facilities for Tring School will need to be extended and additional, detached playing fields provided. The location of these new playing fields will be identified through the Site Allocations DPD: dual use will be sought.”</i></p> <p>Outdoor recreation uses such as this are not considered as an inappropriate use in the Green Belt (as set out in both the NPPF and repeated within the Core Strategy). As the main use of the pitches would be to serve the needs of the school, they would predominantly be in use during the daytime (school hours and after school clubs and matches). There is no intention to include floodlighting or any other ancillary facilities. If these are required in the future they would be the subject of a planning application and would need to be considered against relevant plan policies at that time – including Policy CS32: Air, Soil and Water Quality with regard to noise and light pollution.</p>	No
Dunsley Farm is an important part of the character of the town, being both a working farm and also a farm shop. Concern is raised that the loss of the land to an alternative use would threaten the viability of the farm and the shop. Evidence should be submitted to address this issue.		No change. No information has been provided to explain how the proposed detached playing fields would have a negative impact on existing uses at Dunsley Farm. The farm is operated by a tenant farmer and leased from Hertfordshire County Council. HCC as landowner support the designation and have notified their tenant of the proposal and are happy that there will be no impact on the viability of the proposed use.	No
To be used by Tring School only with no community use Use of the land only as a grass playing pitch (no artificial playing surfaces)		No change. Whilst the designation is specifically required to enable the possible future expansion of Tring School, should it be required, it is appropriate to consider the potential dual use of the playing pitches for wider community use. The planning requirements for Proposal L/4 already refers to the fact that <i>‘These playing pitches will also be made available for community use.’</i> This approach accords with the Policy CS23: Social Infrastructure. No further changes to the wording of the proposal are considered necessary to address this issue. The intention is for the	No

		pitches to be grass: any all-weather pitch would be better located on the school site where floodlighting could be accommodated.	
Land to be kept permanently open with no buildings, hardstanding or other structures being constructed (including ground keeping or changing facilities)		No change. See responses above.	No
The need for a significant landscape buffer to limit impact on the adjacent residential area to be included in the designation		No change. The impact on the adjoining properties will be limited by the fact the pitches will not be all-weather or floodlit. As set out in the response above, it is considered reasonable to add a criterion to the Planning Requirements re protecting and maintaining existing hedgerows and ecological corridors.	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
The delivery of playing fields at Dunsley Farm could potentially give rise to adverse impacts on the site's significant archaeological and heritage interest, recognised by the County Archaeologist and the Hertfordshire Gardens Trust, and its ecological value by virtue of its proximity to a Countryside Wildlife Site.		No change. The use of the land for playing pitches would not have any detrimental impact on any archaeological features that may exist beneath the surface. The area is not located within an Area of Archaeological Significance, nor part of a site proposed as a locally or nationally designated Historic Park and Garden. With regard to impact on ecological corridor and the need to prevent the loss of hedgerows, please see response above (where a change to the Planning Requirements is suggested).	No
Dunsley Farm is located within a strategic gap which is identified as important to maintain as open land in the Green Belt to protect the separation of Tring and Berkhamsted. It is, therefore, also important to consider whether the delivery of playing fields in this location would harm this important Green Belt function and whether there are reasonable alternatives that would have less impact on the Green Belt. The designation should be deferred for consideration as part of the new Local Plan process and text introduced into the body of the Site Allocations DPD to this effect.		No change. The intention to accommodate detached playing fields in this location is a longstanding one. Paragraph 22.4 of the adopted Core Strategy (Tring Settlement Strategy) states that: "Facilities for Tring School will need to be extended and additional, detached playing fields provided. The location of these new playing fields will be identified through the Site Allocations DPD: dual use will be sought." Outdoor recreation uses such as this are not considered an inappropriate use in the Green Belt (as set out in both the NPPF and repeated within the Core Strategy). As the main use of the pitches would be to serve the needs of the school, they would predominantly be in use during the daytime (school hours and after school clubs and matches). There is no intention to include floodlighting or any other ancillary facilities. If these are required in the future they would be the subject of a planning applications ad need to be considered against relevant plan policies – including Policy CS32: Air, Soil and Water Quality with regard to noise and light pollution. A full Green Belt assessment will form part of technical work to inform the new single Local Plan. There is no need to carry out this assessment to deliver detached playing fields (or any of the other changes set out in the Focused Changes), as all comply with the current Core Strategy. This is not an issue that needs to be delayed until the new single Local Plan for the Borough is prepared: although the designation can be reviewed and amended as necessary as part of this process.	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change SC12			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 5			
Key organisations	4		
Individuals	1		
Landowners	0		
Total	5		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
Need for new facilities not justified as no evidence has been submitted to demonstrate that any playing pitches would be required in the future.		No change. See responses to SC10 above.	No
It would be harmful to the Green Belt. The provision of ancillary facilities such as changing, storage, maintenance and car parking facilities” would result in an urbanising and harmful impact on the openness of the Green Belt.		No change. See responses to SC10 above.	No
The proposed field is landlocked, as it does not adjoin any public land or highway. No details are provided as to how the proposed playing pitch would be accessed.		No change. See responses to SC10 above.	No
Concern over highway safety as it is likely that 30 school children at a time would regularly need to cross these busy roads to attend games lessons.		No change. See responses to SC10 above.	No
The propped site is adjacent to existing residential properties at The Limes and Damask Close and my clients are extremely concerned that their residential amenities could be adversely affected, including noise disturbance and light pollution.		No change. See responses to SC10 above.	No
Dunsley Farm is an important part of the character of the town, being both a working farm and also a farm shop. Concern is raised that the loss of the land to an alternative use would threaten the viability of the		No change. See responses to SC10 above.	No

farm and the shop. Evidence should be submitted to address this issue.			
To be used by Tring School only with no community use Use of the land only as a grass playing pitch (no artificial playing surfaces)		No change. See responses to SC10 above.	No
Land to be kept permanently open with no buildings or other structures being constructed (including ground keeping or changing facilities)		No change. See responses to SC10 above.	No
No hard standing to be provided (including car parks and access roads)		No change. See responses to SC10 above.	No
The need for a significant landscape buffer to limit impact on the adjacent residential area to be included in the designation		No change. See responses to SC10 above.	No
No lighting or floodlighting to be provided		No change. See responses to SC10 above.	No
<i>Organisations who agreed made the following comments:</i>			
The Town Council supports these changes to ensure adequate provision of sports facilities. Sport promotes good health and sense of community. Tring benefits from several successful sports clubs, with these changes would help perpetuate.		No change. See responses to SC10 above.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change SC13

Number of people/organisations responding			
Supporting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	0		
Objecting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
We support the Focused Change altering the boundary of the Proposed Locally Registered Park and Garden at Shendish Manor, as per reference SC13.		No change. Support noted and welcomed. The Policy wording related to Heritage Assets (a term that includes locally designated Historic Parks and gardens) is contained in adopted Policy CS27: Quality of the Historic Environment, of the adopted Core Strategy. The role of the Site Allocations DPD is to map a number of such	No

As per our previous representations we would still welcome some clarification as to how the policy approach proposed, without the accompanying policy wording to support the proposed Site Allocations can be considered justified or effective.		heritage assets to ensure they are taken into account in relevant planning decisions.	
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Focussed Change MC2			
Number of people/organisations responding			
Supporting - 1			
Key organisations	0		
Individuals	1		
Landowners	0		
Total	0		
Objecting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	
<i>Individuals who agreed made the following comments:</i>			
I support the work being put on hold as I believe it will give an opportunity to seriously reconsider the use of green belt land		No change. This representation relates to the principle of development at LA1. This was not the subject of a Focussed Change and has been considered through representations on the Core Strategy and Pre-Submission Site	No

especially for LA1.		Allocations DPDs. See response in Report of Representations pertaining to these documents. The role of the Site Allocations DPD is to deliver the policies and proposal set out in the adopted Core Strategy: of which Local Allocation LA1 forms part. Whilst a full Green Belt review is being carried out to inform the new single Local Plan. This process will consider if any additional land is suitable for release and required for development – rather than reconsider existing decisions.	
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC8			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
Amendments to MU/5 supported as this provides clarity that the replacement tennis club facilities will need to meet Government planning policy on replacement sports facilities in accordance with		No change. Support noted and welcomed.	No

paragraph 74 of the NPPF plus will help ensure delivery of replacement facilities to ensure continuity of sports facility provision. The reinforcing of the link between the Leverstock Green Tennis Club site and the Bunkers Park site is also welcomed as the proposals on both site need to be co-ordinated to ensure delivery in practice.			
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC10			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			

<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
Careful consideration would need to be given to how the corner is addressed and the scale of development should be 2.5 or 3 storeys. Therefore the addition of the second sentence within the planning requirements section regarding the height and corner treatment of buildings is welcomed.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC11			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 2			
Key organisations	1		
Individuals	1		
Landowners	0		
Total	2		

Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
<p>It would be a seriously retrograde step to consider removing the facility. Accordingly I object to any proposal that would cause the building and especially its functions to be lost to the citizens of Berkhamsted.</p> <p>The Civic centre is registered as a Community Asset: this obliges the Borough to offer the asset to the citizens should it wish to dispose of it.</p> <p>Should development of the site go forward for housing any Development Brief should be carefully framed to avoid harm to the amenity of local residents as access via Clarence Road or Prince Edward Street is via narrow congested roads where parking is already an issue.</p>		<p>No change. This objection appears to be a result of a misunderstanding regarding the Council's intention for this site. The main intention of this Focused Change was to remove the proposal for this site from the Housing Schedule and to instead add it to the Mixed Use Schedule; as this better reflects the mixed nature of the proposal. There is no intention through this designation to remove the Civic Centre, as it is agreed that this is an important community facility for the citizens of Berkhamsted. The proposal would instead see the redevelopment of the site (retaining the existing building façade to the High Street, to provide a new civic centre, together with some residential development of the remaining land.</p> <p>Whilst a Development Brief is not currently programmed, the comments re its content are noted. These issues would also be considered as part of any planning application.</p>	No
Demolition of the Civic Centre would mean the loss of an events venue.		No change. See response above	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC12			
Number of people/organisations responding			
Supporting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	1		
Objecting - 2			
Key organisations	0		
Individuals	2		
Landowners	0		
Total	2		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Parking at Tring Station will still be a problem despite possible Crossrail development. Use of buses can be encouraged but this is unlikely due to recent time table reductions.		No change. This new text sets out the Council's understanding of the potential Crossrail proposal. If this proposal becomes a reality, it will be implemented as a Government infrastructure project: over which the Council has no planning remit. Any consultation would be advertised and carried out directly by Crossrail or their appointed consultants. Concerns regarding potential impacts on the town can be raised at this stage. It is expected that the Crossrail project would include additional parking provision at the station, although no details have been made available.	No
Additional car use will increase congestion in the town centre as well as being contrary to the need to reduce our impact on the environment through car travel.			
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			

<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
<p>The Crossrail project provides an important opportunity for investment and development at Tring Station.</p> <p>Land to the north of Station Road has clear advantage to benefit from both existing transport links via bus and rail, and the potential Crossrail investment making it the prime candidate for allocation in the emerging development plan documents. Accordingly, the following additional text should be added:</p> <p><i>“The Government is considering extending the current Crossrail project into Hertfordshire to stations including Hemel Hempstead, Berkhamsted and Tring. Should this scheme go ahead, it is expected to lead to reduced journey times and extended services into London without the need to change at Euston. The project could result in significant new investment in the railway stations, particularly at Tring Station, and provide opportunities for sustainable growth. This will be an important consideration in identifying potential sites for future housing development.”</i></p>		<p>No change. This new text sets out the Council’s understanding of the potential Crossrail proposal. It is worth noting that the initiative is still at an early stage. The Core Strategy makes clear that the new Local Plan for the Borough will be informed by a comprehensive Green Belt review and assessment of housing need, but that the outcome of this plan review (including any locational requirements/site identification) cannot be prejudged. The suggested addition is therefore not appropriate.</p>	No

Focussed Change MC16			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 2			
Key organisations	2		
Individuals	0		
Landowners	0		
Total	2		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			

The vision and key development principles should refer to the need to protect the significance and setting of Piccotts End Conservation Area and the planted buffer along the western edge should be amended to at least 15 metres.		No change. Issues relating to the width of landscape buffers and buildings heights for Local Allocation LA1 were raised and responded to as part of the original Report of Representations to the Pre-Submission Site Allocations. MC16 removes reference to two and three storey housing in the first bullet point of the Key Development Principles in Policy LA1, as the wording duplicates that of a subsequent bullet point. The amended text remains appropriate. It is expected that the majority if units will be two storey, although with potential for a higher element may be appropriate in some locations (as set out in the policy). Single storey dwellings (i.e. bungalows) are not expected to be part of the development. Further detail is provided on both matters in the draft master plan that accompanies the Site Allocations DPD.	No
The words 'two and three storey' be replaced with the words 'one, two and three storey' to maximise the range of potential properties to be built at the site, within the topographical and other constraints at the site, if development proceeds.			
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC17	
Number of people/organisations responding	
Supporting - 1	
Key organisations	1
Individuals	0
Landowners	0
Total	1
Objecting - 1	
Key organisations	1
Individuals	0

Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
The vision and key development principles should refer to the need to protect the significance and setting of Piccotts End Conservation Area and the planted buffer along the western edge should be amended to at least 15 metres.		No change. See response above.	No
The words 'two and three storey' should be replaced with the words 'one, two and three storey' to maximise the range of potential properties to be built at the site, within the topographical and other constraints at the site, if development proceeds.			
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC19			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	0		
Individuals	1		
Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Add to amendment after "infrastructure upgrades" "especially considering the effect on Piccotts End" Reason: Piccotts End is currently affected by run off water from Grove Hill and its drainage system at present cannot cope.		No change. This modification refers to the need to ensure there is sufficient waste water and sewerage capacity in the local network. The representation relates to surface water, which is address via a separate Focused Change (MC20). MC20 requires the local planning authority to ensure there is appropriate sustainable drainage integrated into the LA1 scheme. The impact of runoff on adjoining land would form an integral part of this sustainable drainage scheme. The issue if therefore sufficiently covered without the need for explicit reference to Piccotts End.	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			

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

Focussed Change MC21			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 2			
Key organisations	0		
Individuals	2		
Landowners	0		
Total	2		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
Reference to the historic environment in the policy has now been included, making the plan sound.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Limit houses to two storey.		Change required. It is proposed to further amend key development principle 4 to state ' <i>Limit housing to two storeys, except where two and a half storey housing would create interest and focal points in the street scene.</i> ' The change adds an additional clause to the end of this sentence adding that it should not be harmful to the historic environment.' The text, with Focused Change MC21 and the further change now proposed, is considered to provide clear and appropriate advice regarding building heights for this site.	Yes
<i>Individuals who agreed made the following comments:</i>			

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

Focussed Change MC22			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 2			
Key organisations	0		
Individuals	2		
Landowners	0		
Total	2		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Does this mean that excavation works by Thames Water will be		No change. Paragraph 6.28 of the Site Allocations (which is not subject to any wording changes via the Focused	No

necessary prior to 2021?		Changes) states that LA2 will “bring forward completed homes from 2021 onwards..... However, there will need to be a lead in period in order to allow practical delivery from 2021. In practice this will mean that applications will be received and determined in advance of 2021 and that site construction and works may actually take place ahead of the specified release date to enable occupation of new homes by 2021.”	
Individuals who agreed made the following comments:			
-		N/A	No
Landowners			
Landowners who disagreed made the following comments:			
-		N/A	No
Landowners who agreed made the following comments:			
-		N/A	No

Focussed Change MC23			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 3			
Key organisations	1		
Individuals	2		
Landowners	0		
Total	3		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
Organisations who disagreed made the following comments:			
Inconsistent with national policy as there is no exceptional circumstance to justify development on the Green Belt.		No change. This representation relates to the principle of development at LA2. This was not the subject of a Focussed Change and has been considered through representations on the Core Strategy and Pre-Submission Site Allocations DPDs. See response in Report of Representations pertaining to these documents.	No

<i>Organisations who agreed made the following comments:</i>			
-		N/A	
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Does this mean that excavation works by Thames Water will be necessary prior to 2021?		No change. See response to MC22 above.	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC24			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 4			
Key organisations	2		
Individuals	1		
Landowners	1		
Total	4		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			

Organisations who disagreed made the following comments:			
<p>The following amendments should be made, as shown in italics:</p> <p>Arrange buildings and routes to achieve natural surveillance, good pedestrian access to facilities and an attractive relationship to open spaces, <i>and to maximise the potential for active and passive solar heating and energy generation.</i></p> <p>Design, layout and landscaping to safeguard the archaeological, ecological, biodiversity and heritage assets within and adjoining the development <i>and to minimise the visual impact of the development as seen from all points of the surrounding landscape.</i></p>		<p>No change. This response does not relate to the Focused Change per se, but to other changes the respondent wishes to see to the Key Development Principles for the site.</p> <p>The addition of reference to active and passive solar heating and energy generation is not necessary within the policy. There is already a criterion under the 'Design' section requiring developers to 'Design the development to the highest sustainability standards possible.' The master plan that accompanies Policy LA3 is the appropriate place to add detail to these principles. Within this document, section 4 on Sustainability already contains almost identical text to that suggested by the respondent i.e. the requirement for "<i>Minimising energy use through design including considering the orientation of properties at a detailed stage in order to maximise passive solar gain.</i>"</p>	No
<p>The key Development Principles for Policy LA3 currently do not include ecological assets.</p> <p>Recommend the following amendment:</p> <p><i>'Design, layout and landscaping to safeguard the archaeological, heritage <u>and ecological</u> assets within and adjoining the development'</i>.</p> <p>This amended statement will serve to endorse the need to secure appropriate habitat creation and management of the open space to help address the ecological concerns.</p>		<p>Change required. Whilst the master plan for the site contains a number of detailed requirements relating to green infrastructure and open space, it is agreed that specific reference to ecological assets is missing from Policy LA3. The addition of this reference to ecological, as well as archaeological and heritage assets, is therefore supported.</p> <p>An associated change needs to be made to the masterplan for LA3 to ensure consistency between the requirements of the two documents. Changes have already been made to the draft masterplan to reflect the work of the Hertfordshire Local Nature Partnership (LNP), in partnership with the Herts and Middlesex Wildlife Trust as well as Hertfordshire County Council and the Herts Environmental Record Centre, in producing a report on Hertfordshire's Ecological Networks following a county-wide mapping project.</p>	Yes
<p>The phrase 'to safeguard' implies protection or retention of any such assets. We consider that the following change should be made.</p> <p>"Design, layout and landscaping to mitigate the impact on archaeological and heritage assets within and adjoining the site and safeguard such assets that may adjoin the site."</p>		<p>Change required. The word 'safeguard' was used as it reflects the Council's general approach to heritage assets as set out in Policy CS27: Quality of the Historic Environment of the Core Strategy. This states that "<i>All development will favour the conservation of heritage assets. The integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected, conserved and if appropriate enhanced..... Features of known or potential archaeological interest will be surveyed, recorded and wherever possible retained.</i>" This wording therefore goes further than just seeking to mitigate impacts as a general approach. However, it is considered appropriate when considering heritage assets with regard to a development site to distinguish between the treatment of assets within the site itself and those that lie beyond. The suggested wording makes this distinction and is generally supported. However, a better wording (that also combines the above proposed ecological change) is considered to be as follows:</p> <ul style="list-style-type: none"> • 'Design, layout and landscaping to mitigate the impacts on the archaeological, heritage and ecological assets within the site and safeguard those adjoining the development.' <p>This wording change has already been partially used in the updated LA3 master plan, so it is also appropriate to reflect this change in Policy LA3. The amendment will require a further small related change to the master plan for consistency.</p>	Yes
Organisations who agreed made the following comments:			
It would have been helpful to provide greater clarity in the plan with regards to archaeology.		<p>No change. Policy LA3 of the Site Allocations DPD is intended to set the broad parameters for development of the site. It is the role of the associated site master plans, plus technical studies that have been carried out for the site to add detail and help inform the planning application. This technical work includes an archaeological assessment. No change is therefore proposed to Policy LA3 with regard to this issue – as it is already appropriately referenced</p>	No

		through the addition of Focused Change MC24.	
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
The text of MC24 should include to safeguard the amenity value of the local environment for existing properties eg. pleasant outlook across open countryside from existing properties. Peace and tranquillity of non through routes to road traffic.		No change. Concerns regarding the impact of LA3 development upon the views and outlook of existing residents of Chaulden and Warners End have been raised through earlier stages of consultation. It is accepted that the outlook of some existing residents will be affected. This is unfortunately unavoidable as a result of the proposed development. Policy LA3, together with the associated site master plan seeks to ensure that these impacts are mitigated as far as is possible. This includes the requirement that the main vehicular access points are from Long Chaulden and The Avenue, rather than via the congested cul-de-sacs to the south; the fact that buildings heights will normally be limited to two storey and criteria relating to landscaping and open space and the retention of existing tree and hedgerows.	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC25			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	1		
Issue / Summary of Comment	New /	Response	Amendment

	Significant?		required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
<p>Taylor Wimpey and Barratt support the need for a comprehensive approach to the development and in particular the delivery of community infrastructure and other S106 obligations but this may not be by a single outline planning application covering “the site as a whole.”</p> <p>Accordingly, we object to the addition of this phrase as presently drafted.</p> <p>We would suggest the following wording.</p> <p><i>The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate broad compliance with the Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.</i></p>		<p>Change required. The Council is keen to ensure delivery of a comprehensive form of development and associated works (such as foul water drainage) and other contributions. This can be difficult to achieve where a scheme involves a series of landowners, such as at LA3. The Council’s expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This alternative wording was also suggested and considered in regard of the draft LA3 master plans. The Council considers the amended text is preferable in terms of clearly articulating what the Council wishes to achieve and better reflects the scope of its planning powers. This amended wording has already been included within the master plan – so it is appropriate to amend Policy LA3 (and other relevant Local Allocation policies) similarly.</p>	Yes
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC26			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 3			
Key organisations	0		
Individuals	2		
Landowners	1		
Total	3		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Transport also needs to be considered in a coordinated manner to ensure that all new developments are considered.		No change. These issues are already appropriately referred to in the 'Delivery and Phasing' section of Policy LA3, with further guidance include within the associated site master plan.	No
Other issues which still need addressing are the provision of schools, both primary and secondary and the access to health care - doctors and hospital facilities.			
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			

<p>In relation to the 1st bullet point, this should be amended to make clear that upgrades to infrastructure should be directly related to and required by the development and are not being secured through the wider infrastructure planning or CIL.</p> <p>Suggested revision :-</p> <p><i>Early liaison required with Thames Water to develop a Drainage Strategy to identify any infrastructure upgrades that are required as a result of the development, and not otherwise funded through CIL or other infrastructure investment plans of the Council or statutory undertakers, in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.</i></p>		<p>No change. The wording included in Focused Change MC26 is consistent with that proposed for the other Local Allocations and their associated site master plans. The additional text is not required as any contributions secured through S106 would need to meet the statutory tests set out in Regulation 122 of the CIL Regulations 2010 (as amended) in terms of it being proportionate and justifiable in terms of the nature and scale of development.</p>	No
<p>Landowners who agreed made the following comments:</p>			
-		N/A	No

Focussed Change MC27																			
<p>Number of people/organisations responding</p> <p>Supporting - 1</p> <table data-bbox="261 1045 638 1186"> <tr><td>Key organisations</td><td>0</td></tr> <tr><td>Individuals</td><td>0</td></tr> <tr><td>Landowners</td><td>1</td></tr> <tr><td>Total</td><td>1</td></tr> </table> <p>Objecting - 0</p> <table data-bbox="261 1262 638 1402"> <tr><td>Key organisations</td><td>0</td></tr> <tr><td>Individuals</td><td>0</td></tr> <tr><td>Landowners</td><td>0</td></tr> <tr><td>Total</td><td>0</td></tr> </table>				Key organisations	0	Individuals	0	Landowners	1	Total	1	Key organisations	0	Individuals	0	Landowners	0	Total	0
Key organisations	0																		
Individuals	0																		
Landowners	1																		
Total	1																		
Key organisations	0																		
Individuals	0																		
Landowners	0																		
Total	0																		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?																
Organisations																			
<i>Organisations who disagreed made the following comments:</i>																			
-		N/A	No																
<i>Organisations who agreed made the following comments:</i>																			
-		N/A	No																

Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
The character of Pouchen End will be protected and preserved by the councils Development Management Policies. It is important to maintain a separation of development from Winkwell and also Potten End Lane and maintaining within LA3 a green buffer, to be kept as existing, at the Junction of Pouchen End Lane and Chaulden Lane, and where the council will be able to control the future of this area of land through its LA3 and other policies.		No change. Support noted and welcomed.	No

Focussed Change MC28			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting – 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?

Organisations			
<i>Organisations who disagreed made the following comments:</i>			
<p>A recent consultant ecologist survey recommends that compensation is likely to be required for the loss of the wildlife site at LA4, and this is confirmed by subsequent Hertfordshire Ecology survey.</p> <p>MC28 should be re-worded to state:</p> <p><i>'This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions, including biodiversity offsetting'.</i></p> <p>An amended statement will serve to endorse the need to secure appropriate compensation in the form of biodiversity offsetting to help address the ecological concerns outlined above.</p>		<p>No change. The reference to the potential for biodiversity off-setting with regard to this site is already covered sufficiently within the text of the existing 'Delivery and Phasing' section of the policy. This text states that <i>"Contributions may also be required towards offsetting loss of wildlife resources and early liaison with Hertfordshire County Council (Ecology) is recommended."</i></p>	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC31	
Number of people/organisations responding	
Supporting - 0	
Key organisations	0

Individuals	0		
Landowners	0		
Total	0		
Objecting - 2			
Key organisations	0		
Individuals	2		
Landowners	0		
Total	2		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
The decision to keep a traveller site within the borders of Tring town is not sound because it has been established that there are better sites available within Dacorum BC, which would be more appropriate.		No change. See responses to SC7 and SC8 above.	No
Chilterns AONB will be less enhanced by development			
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	

Focussed Change MC32			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	0		
Individuals	1		
Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
The cemetery extension is still separate.		No change. Focused Change MC32 does not relate to the principle of the cemetery extension or its proposed location to the west of the main housing development area, rather than in immediate proximity to the existing cemetery site. The reasons for the choice of site were explained in the Report of Representations to the Pre-Submission Site Allocations (July 2015) and is further justified in a separate Background Issues Paper: Additional Burial Space to Serve Tring Area (July 2015).	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No

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

Focussed Change MC33			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	0		
Individuals	1		
Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
Where will users of the proposed sports pitches park?		<p>No change. This comment relates to the practical application of the open space provided in the western part of LA5. It is expected that the pitches, if provided, will be used by many people who live within walking distance of the site. There is also an existing lay-by on Icknield Way adjacent to the site.</p> <p>Paragraph 5.35 in the LA5 Draft Master Plan explains that playing fields should be limited to part of the western fields in order to protect the special qualities of the Chilterns AONB. This will limit the demand for parking spaces. In addition, paragraph 5.36 states that any new building and car parking to serve the possible playing fields should be small-scale and unobtrusive.</p>	No

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

Focussed Change MC47			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
It is not clear what the re-use entails as the site is not mentioned elsewhere in the plan. Our original representation (comment ID36) objected to the lack of reference to listed buildings within the planning requirements for this site, reflecting the proximity of several heritage assets, so clarification on its new use would be helpful.		No change. MC47 involves the deletion of the Housing Proposal at 39-41 Marlowes from the housing allocation schedule, as this building has now been let on a long terms lease to the NHS Foundation Trust for use as healthcare facility. The existing building will therefore be retained in its present form and there will therefore be no impact upon adjacent listed buildings.	No

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

Focussed Change MC48			
Number of people/organisations responding			
Supporting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			

Amendments clarify that the redevelopment of this site for housing can only proceed if the replacement tennis club facilities at the Bunkers Park site meet Government planning policy on replacement sports facilities in accordance with paragraph 74 of the NPPF.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC56			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			

<i>Organisations who disagreed made the following comments:</i>			
<p>Suggested wording change:</p> <p><i>“Early liaison required with Thames Water to develop a Drainage Strategy to identify any <u>site specific</u> infrastructure upgrades required in order to ensure that sufficient sewerage and sewerage treatment capacity is available to support the timely delivery of this site.”</i></p> <p>This addition is necessary to ensure that any upgrades are fairly and reasonably related in scale and kind to the development, as stipulated by CIL Regulation 122.</p>		No change. This representation does not appear to relate to MC56. However, this wording change to the text of the Focused Changes is not required for the very reason cited by the objector. Regulations are already in place that would prevent the Council requiring any upgrades under CIL that are not compliant with the Council’s Regulation 123 List, or that fail to meet the statutory S106 tests.	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC58	
Number of people/organisations responding	
Supporting - 1	
Key organisations	1
Individuals	0
Landowners	0
Total	1
Objecting - 0	

Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
Our original representation (comment ID39) recommended that development should be limited to two storeys and be sited tight to the back of the pavement. We therefore welcome MC58 and its encouragement of locating development tight to the rear of the pavement.		No change. Support noted and welcomed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC59
Number of people/organisations responding
Supporting - 1

Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Objecting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
Our original representation (comment ID41) requested that the planning requirements state a presumption in favour of retaining 131 High Street in order to make the plan sound. We therefore welcome MC59, which recognises that the building is of heritage merit and the possibility of retaining the building should be explored. This addresses our original representation.		No change. Support noted and agreed.	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC60			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 2			
Key organisations	0		
Individuals	1		
Landowners	1		
Total	2		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
The primary schools which are apparently suitable for expansion are at quite a distance from the development site.		No change. This objection relates generally to primary school provision – and the capacity for existing schools to be expanded to meet needs – rather than to the wording of MC60 <i>per se</i> . The County Council (as local education authority) are satisfied that there will be sufficient school capacity at both primary and secondary levels to accommodate the level of growth proposed for the town. The words in MC60 have been added to help provide clarity, rather than indicating any change in approach.	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			

It will be necessary to demonstrate very special circumstances for allocating the land for pitches and to test potential sites against the five purposes of Green Belt. While proximity to the High School is clearly an important consideration, sites should also be assessed in terms of landscape and environmental policies, as necessary; and the approach to site selection can only be fully justified through a consideration of all reasonable alternatives.		No change. See responses to SC10 above.	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC61			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 2			
Key organisations	1		
Individuals	0		
Landowners	1		
Total	2		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No

<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
<p>MC61 puts forward a specific Primary School requirement for Spencer's Park Phase 2 which is within the area of the East Hemel Hempstead Area Action Plan (AAP). However the Site Allocations DPD specifically excludes consideration of the AAP area as is made perfectly clear in Para 1. 7</p> <p>The following text (MC61) should be deleted:</p> <p><i>"Phase 2 of the Spencer's Park development will incorporate a new 2 form entry primary school to meet the needs of the local community."</i></p> <p>This deletion will help ensure that the DPD does not include a development requirement relating to a development site outside the geographical scope of the DPD and in so doing the deletion removes a potential cause of unsoundness.</p>		<p>No change. This is a factual reference to the primary school that is required to enable delivery of Phase 2 of the Spencer's Park scheme. It was included at the request of the Local Education Authority to add clarity to the picture regarding future school provision in the Hemel Hempstead area and is considered appropriate to include for this reason.</p>	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC63			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		
Landowners	0		
Total	0		
Objecting - 1			
Key organisations	1		
Individuals	0		
Landowners	0		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?

Organisations			
<i>Organisations who disagreed made the following comments:</i>			
<p>Objection to the statement that:</p> <p>“The use and management of most of the western fields for open space will enhance the appearance and enjoyment of the Chilterns AONB.”</p> <p>The use of most of the western fields for open space is unlikely to enhance the appearance of the Chilterns AONB given that the land is currently open farmland.</p> <p>Ensure that the text of the document is explicit that the western fields should only ever be used for informal open space or left in agricultural use.</p>		<p>No change. This Focused Change relates to the detailed wording of Proposal C/1 which is the provision of a detached extension to Tring Cemetery. The new wording adds reference to the need for the design details relating to the cemetery extension to be discussed with the Chilterns Conservation Board. This wording quoted by the objector does not appear in Proposal C/1 and seems to relate to an objection to the use of the western fields as open space, rather than to the adjacent cemetery extension.</p> <p>The references to the use of the western fields within the Site Allocations document (and associated LA5 master plan) are appropriate and reflect expectations regarding future uses. See related responses in the Report of Representations for the Site Allocations (July 2015).</p>	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC64			
Number of people/organisations responding			
Supporting - 0			
Key organisations	0		
Individuals	0		

Landowners	0		
Total	0		
Objecting - 1			
Key organisations	0		
Individuals	0		
Landowners	1		
Total	1		
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
-		N/A	No
<i>Organisations who agreed made the following comments:</i>			
-		N/A	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
Overall support for the changes to the designation put forward by the Focused Changes. However, suggest that reference to The Chilterns Conservation Board is excluded from the planning requirement, as they are not a statutory consultee. Suggest amended wording as follows: <i>"Phased approach to redevelopment of existing built footprint of previously developed part of the site. The design, layout and scale of development to be guided by its sensitive location in the Chilterns Area of Outstanding Natural Beauty, open setting, and the ability of St Margarets Lane to serve the site. Advice to be sought from the Chilterns Conservation Board at the design stage and including taking account of the Chilterns Building Design Guide and associated Technical Guidance Notes.—Existing landscaping to be retained and, where appropriate, enhanced. Replacement of some of the existing</i>		No change. The objector suggests a slightly amended wording to the amended planning requirements for Proposal C/2 relating to the Amaravati Buddhist Monastery, removing reference to the need to consult the Chilterns Conservation Board. This change is not supported, as, it is appropriate for the Council to seek the views of the Chilterns Conservation Board on development matters within the AONB. It is appropriate too to cross refer to the helpful guidance prepared by the Chilterns Conservation Board (and endorsed by the Borough Council) relating to design and materials as this should assist in ensuring a high quality scheme that reflects the local vernacular.	No

<i>buildings within the previously developed part of the site is acceptable provided they are of a high quality of design. Significant intensification of current activities on the site will not be acceptable.”</i>			
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

Focussed Change MC68

Number of people/organisations responding	
Supporting - 0	
Key organisations	0
Individuals	0
Landowners	0
Total	0
Objecting - 2	
Key organisations	1
Individuals	1
Landowners	0
Total	2

Issue / Summary of Comment	New / Significant?	Response	Amendment required?
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Organisations

Organisations who disagreed made the following comments:

The idea of locating new pitches at LA5, Icknield Way, to the west of Tring, is unsound. The statement in the Playing Pitch Strategy and Action Plan in the new sub-section entitled “Potential for new sites” at page 63 that “the shortage of rugby pitches particularly in the area may suggest that this would be a logical site for the provision of match pitches” lacks all reason. The Plan itself emphasises that playing pitches that are significantly detached from others managed by any relevant local community club would not be usable nor sustainable.		No change. This objection relates the Council’s wider approach to sports provision, rather than to Focused Change MC68. See responses above to SC10 – regarding proposal for detached playing field at Dunsley Farm, Tring. No changes recommended with regard to this representation, as the Council’s approach is considered to be sound.	No
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Organisations who agreed made the following comments:

-		N/A	No
---	--	-----	----

Individuals

<i>Individuals who disagreed made the following comments:</i>			
Following the recent statement by Steve Quartermain CBE Chief Planner for the Department for Communities and Local Government issued on 31st August 2015, DBC have not determined 'whether persons are "gypsies and travellers" for the purposes of this planning policy - ie. a) whether they previously led a nomadic habitat of life b) the reasons for ceasing their nomadic habit of life c) whether there is an intention of living nomadic habit of life in the future, and if so how soon and in what circumstances.		No change. See response to SC7 above and to Cabinet Report setting out the Council's response to representations on the Focused Changes (December 2015).	No
-		N/A	No
<i>Individuals who agreed made the following comments:</i>			
-		N/A	No
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
-		N/A	No
<i>Landowners who agreed made the following comments:</i>			
-		N/A	No

The following table provides a summary of comments received on the Focused Changes consultation that were of a general nature and not tied to any of the Focused Changes themselves. Whilst these are not considered to be 'duly made' as they do not relate to matters now under consultation, they are reported and responded to in order to ensure a complete picture of all representations received is given

Focussed Change – General Comments	
Number of people/organisations responding	
Supporting - 2	
Key organisations	2
Individuals	0
Landowners	0
Total	0
Objecting - 19	
Key organisations	8
Individuals	8
Landowners	3

Total		19	
Issue / Summary of Comment	New / Significant?	Response	Amendment required?
Organisations			
<i>Organisations who disagreed made the following comments:</i>			
<u>Dixon's Wharf, Wilstone, Tring</u> Dixon's Wharf, Wilstone should be allocated for mixed use housing with provision for associated local services. We do not agree with the Council's reasons for not taking this site forward. The site is physically separate from the wider countryside and should not be termed greenfield. The land has not reverted back to the agricultural fields and currently is disused, degraded and of no beneficial use.		No change. This representation does not relate to the Focused Changes but repeats a previous request for this site to be allocated for development. See page 31 of Report of Representations on the Site Allocations (July 2015) for the Council's response.	No
<u>LA3</u> The LA3 development should be removed from the DBC Core Strategy as a result of its contravention with the NPPF and government's position of the use & destruction of greenbelt.		No change. This representation does not relate to the Focused Changes but repeats previous objections to the principle of designating LA3 and the nature of this proposal itself. See previous responses in Reports of Representations relating to the Core Strategy and to Site Allocations Report of Representations (July 2015). As previously stated, the Council's approach accords with NPPF and Government's position on the Green Belt.	No
<i>Organisations who agreed made the following comments:</i>			
<u>L/4</u> Note that provision has been made for additional playing fields for Tring senior school but find no reference in the document to any review of Tring senior school intake/size being reviewed in line with the additional housing proposed within the catchment (and within neighbouring villages such as Pitstone) and would urge DBC to ensure that the education department undertake this exercise.		No change. Hertfordshire County Council (the local education authority) has been closely involved with the production of the Council's Core Strategy and Site Allocations DPDs. They are satisfied that the existing secondary school can accommodate the additional pupil yields generated from the scale of new development expected in the Tring area over the lifetime of the plan. The school may however need to expand, and this is referred to in the Tring Place Strategy in the Core Strategy and reflected in the inclusion of the detached playing fields as Proposal L/4 in the Site Allocations DPD. The District and County Council will continue to liaise regularly on school matters, and take advice from Buckinghamshire County Council as necessary on cross boundary matters. All updated information and advice will be reflected in the Council's Infrastructure Delivery Plan (InDP), which is updated on a regular basis.	No
<u>T/20 and T/21 Transport Proposals</u> Support the enhancements to Tring station (including additional car parking) and the installation of the foot/cycle path along Northfield Road to connect Pitstone to Tring station (neither of which appear to have been amended in your latest document).		No change. Support noted and welcome. The Focused Changes do not propose any changes to these designations	No
<u>Locally Registered Park or Garden of Historic Interest</u> We fully support the inclusion of 13 of the historic parks and gardens identified as of local importance by HGT. 2 more gardens of local historic interest have since been identified, linked to the local Berkhamsted Cooper family and both Japanese in style. We have added them to our list. As well as those included by DBC in this document we believe that the supplementary sites also support the heritage objective (SA10) and have positive effects for the landscape (objective SA11).		No change. The Council will consider whether it is appropriate to amend the list of Locally Registered Historic Parks and Gardens when it prepares its new single Local Plan and will take further advice from the Herefordshire Gardens Trust (and other appropriate bodies) at this time. In the meantime, Policy CS27: Quality of the Historic Environment already provides appropriate protection for reflecting gardens of local historic interest that are not formally designated. The policy states that " <i>All development will favour the conservation of heritage assets</i> " and that " <i>the integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected, conserved and if appropriate enhanced.</i> " No further change to the Site Allocations DPD is therefore recommended at this time.	No

<p><u>Site for consideration</u></p> <p>Our interest is, and has been for some while, the provision of allotments on the Council owned land to the north of Hempstead Road and west of the drive into Little Hay Golf Course. This would give good benefit to the local residents as Bovingdon does not have any such provision.</p> <p>I am unsure whether this type of 'development' is included in your study. However, if you would bring this forward in your planning regime it would be much appreciated by our Society, and the local community.</p>		<p>No change. This representation does not relate to the Focused Changes but repeats a previous request raised through consultation on Local Allocation LA6. See Report of Consultation on Local Allocations Master Plans (September 2015).</p>	No
<p><u>Ministry of Defence comments</u></p> <p>Hemel Hempstead – the sites identified for Hemel Hempstead fall within the statutory met safeguarding zone for Chenies. Therefore, any development exceeding 15.2m should be referred to this office for review.</p> <p>Berkhamsted – the sites identified for this area fall within the statutory bird strike safeguarding zone for Halton airfield. Therefore any development including open waterbodies, reservoirs, refuse tips, should be referred to this office for review. The site also falls within the statutory met safeguarding zone for Chenies. Therefore, any development exceeding 10.7m and 15.2m above ground level should be referred to this office for review.</p> <p>Tring – the sites identified for this area fall within the statutory bird strike safeguarding zone for Halton airfield. Therefore any development including open waterbodies, reservoirs, refuse tips, should be referred to this office for review. The site also falls within the statutory met safeguarding zone for Chenies. Therefore, any development exceeding 10.7m and 15.2m above ground level should be referred to this office for review.</p> <p>Finally Markyate– the sites identified fall within the statutory met safeguarding zone for Chenies.</p> <p>Therefore, any development exceeding 10.7 &15.2m should be referred to this office for review.</p>		<p>No change. The issue of airspace safeguarding zones does not directly relate to the Focused Changes. Neither does the wider Site Allocations DPD include any sites where tall buildings are specified or promoted. If any such applications were to be received, the Council's Development Management team already notifies relevant organisations as part of standard procedures. No changes are therefore required to the Site Allocations document as a result of these representations.</p>	No
<p><u>Heathrow Airport Limited comments</u></p> <p>The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development.</p>			
<p>Local planning authorities should follow the guiding principles of the Local Nature Partnership to:</p> <ul style="list-style-type: none"> • Achieve strong policies in their Local Plans to protect and enhance biodiversity in Hertfordshire. • Ensure their Local Plans are informed by the latest ecological data and evidence. 		<p>No change. This is a standard response sent by the LNP to all planning consultations. The Council considers it has incorporated the guiding principles into its planning strategy: with recent changes to the Local Allocations master plans explicitly including reference to the new 'Ecological Networks' project.</p>	No

<ul style="list-style-type: none"> Plan development to avoid habitat loss and fragmentation and identify opportunities to improve the ecological connectivity between habitats. Consider the multiple benefits and functions that can be delivered by healthy ecosystems. 			
<p>Although we welcome the addition of further text within the allocations document specifically stating that early liaison is required with Thames Water we remain concerned with the lack of evidence demonstrating that your proposed allocations can be served by the wastewater network with no detrimental impact to water quality.</p>		<p>No change. Objections to the Site Allocations DPD by Thames Water will be through a ‘Statement of Common Ground’ being drawn up between the EA, Thames Water (as the sewerage infrastructure provider) and the Council. This will set out areas of agreement between the parties and those areas where the Council and Thames disagree with the EA’s position. This Statement will be submitted to the Inspector to enable him/her to take an informed view of the situation. In summary, the Environment Agency’s concerns are not considered to relate to an issue of ‘soundness’ for a number of planning and legal grounds:</p> <ol style="list-style-type: none"> 1. Their concerns relate to the overall quantum of development, rather than raising any concerns regarding individual sites. Such strategic level concerns should have been raised at the Core Strategy stage. Instead comments of support were received from the EA at this time. 2. Thames Water supports the Council’s approach as set out in the Site Allocations (as amended by a series of minor changes). 3. The technical work required by the EA is already underway on a county-wide basis and will be available to inform the early partial review of the Core Strategy. The EA and Thames Water are both involved with this work. 	No
Individuals			
<i>Individuals who disagreed made the following comments:</i>			
<p><u>LA1</u> It is counter to Government policy, unmet need, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the green belt.</p>		<p>No change. These representations do not relate to the Focused Changes but repeat previous objections to the principle of designating the Local Allocations and the nature of the proposals themselves. See previous responses in Reports of Representations relating to the Core Strategy and to Site Allocations Report of Representations (July 2015). As previously stated, the Council’s approach accords with NPPF and Government’s position on the Green Belt.</p>	No
<p><u>LA5</u> Part of Donkey Lane is owned and registered in the names of the owners of Woodlands and Rose Bank. They are also responsible for the upkeep of the highway to their properties, which will be responsible for the upkeep for the proposed cycleway and ownership of the land?</p>			
<p><u>LA3</u> The LA3 development should be removed from the DBC Core Strategy as a result of its contravention with the NPPF and government’s position of the use & destruction of greenbelt.</p>			
<p><u>LA3</u> It is clear from the latest central Government pronouncements that an inability to demonstrate a five year supply of housing land is not a sufficiently exceptional circumstance to justify losses from the green belt. There are plenty of empty sites throughout the Maylands Industrial Area and elsewhere to meet any proven housing need.</p>			
<p><u>LA3</u> The proposals need to be rewritten showing much more how existing</p>			

residents interests are protected during and following the developments. If current home owners interests are adversely affected that measures are taken to compensate them.			
<i>Individuals who agreed made the following comments:</i>			
-		N/A	
Landowners			
<i>Landowners who disagreed made the following comments:</i>			
<u>The Housing Programme 2006-2031</u> Table 3: We note that the document fails to provide full details of the 5 Year Housing Supply (5 YHLS) [Table 3]. This is a significant omission given the importance that the Core Strategy EiP Inspector (and subsequently the High Court) placed on the council's claim of having a deliverable housing supply to make the Core Strategy 'sound' pending an early review of the plan. A further column should be inserted in Table 3 clearly identifying the contribution of each claimed source to the 5 YHLS and providing the reader with further clarity on the Council's housing provision over the plan period.		No change. The 5 year housing land supply is monitored and reported through the Council's Authority Monitoring Report (AMR), using data from the associated Residential Land Position Statement. The AMR provides a detailed and up to date overview of housing supply in the Borough as effectively sought by the respondent. It also sets out the Council's position regarding progress on meeting its Core Strategy housing target and 5 year housing land supply. This AMR is considered by Cabinet in December of each year and published on the Council's website in the following early January. As the information changes over time, it is not appropriate (or common practice) to include this within the Site Allocations DPD.	No
<u>Kings Langley Green Belt</u> Objecting on the basis that the Council still does not advocate a change to the Green Belt boundary in the Love Lane area of Kings Langley. Given the scale of other changes proposed in the focused changes consultation it is considered that an adjustment to the Green Belt here could have been addressed.		No change. This representation does not relate to the Focused Changes but repeats a previous objection to the plan: see responses to Chapter 2: (a) Green Belt in Site Allocations Report of Representations (July 2015). The Core Strategy makes it clear that it is not the role of the Site Allocations DPD to carry out a full review of the Green Belt within Dacorum and this is reiterated in paragraph 2.4 -2.6 of the Site Allocations written statement. A full review of the Green Belt boundaries will form part of the new single Local Plan process (and indeed this work is already underway, with a Stage 1 Study available on the Council's website). See Sustainable Development Background Issues Paper for further explanation.	No
Objection to the retention of the Chilterns Jaguar site in the Green Belt. A car dealership site has been in operation on this site since 1946 and it is evident that the site fulfils none of the Green Belt functions detailed in the NPPF. It is therefore our assertion that the site's Green Belt designation is anomalous and the opportunity should be taken in the emerging Site Allocations DPD to amend the Green Belt boundary accordingly to exclude this site.		No change. This representation does not relate to the Focused Changes but repeats a previous objection to the plan: see responses to Chapter 2: (a) Green Belt in Site Allocations Report of Representations (July 2015). The Core Strategy makes it clear that it is not the role of the Site Allocations DPD to carry out a full review of the Green Belt within Dacorum and this is reiterated in paragraph 2.4 -2.6 of the Site Allocations written statement. A full review of the Green Belt boundaries will form part of the new single Local Plan process (and indeed this work is already underway, with a Stage 1 Study available on the Council's website).	No
Primary Healthcare [p63] It is a serious oversight that this document, published in June, makes absolutely no reference to the very serious concerns made public by the alliance of GP practices in Berkhamsted prior to the recent elections in May. Given that they are citing the need in Berkhamsted for a 'Health Hub' able to deliver a wider range of medical services than is usual for a GP practice, it behoves the Borough to work with the Commissioning Group to assess and plan for a building of a suitable scale to meet the		No change. The Council has discussed issues relating to GP provision and general healthcare provision across the Borough with health providers as part of the update to its Infrastructure Delivery Plan (InDP). The Council is aware of the aspirations in Berkhamsted to provide a 'Health Hub' or 'Super-Surgery' in the town and has had discussions regarding potential site options. Due to the constrained nature of the town, it was agreed by both parties that there are no suitable sites available at this time. Health needs for residents of Berkhamsted can however continue to be met appropriately through existing provision in terms of the level of development proposed in the Site Allocations DPD for the town. The potential for a new facility to be accommodate on the edge of Berkhamsted, on Green Belt land, or as part of a wider brownfield redevelopment scheme, will be considered as part of the new Local Plan process.	No

<p>delivery of a mix of services in a location that can be readily accessed ideally in the town centre.</p> <p>I hope this observation will be carried forward as the Borough firms up on possible sites that might be made available for such a 'Health Hub'.</p>			
<p><i>Landowners who agreed made the following comments:</i></p>			
<p>-</p>		<p>N/A</p>	

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

Notes

1. Part A of the Schedule below sets out changes required as a result of consideration of responses received to the Focused Changes to the Pre-Submission Site Allocation DPD. Part B sets out some additional changes that are required to the Site Allocations DPD to ensure it remains consistent with the associated draft masterplans prepared for the Local Allocations. In some cases consultation responses on these master plans has resulted in changes to some text, which is repeated within the Site Allocations. It is appropriate for these 'knock on' changes to be made, to ensure consistency between the Site Allocations Policies and the associated master plans.
2. All changes relate to the text of the Site Allocations DPD. No changes require any amendments to the Map Book, which illustrates changes to the Policies Map.
3. All changes are considered to fall within the definition of 'minor amendments' i.e. they do not have a significant impact upon the way a policy or proposal is interpreted, rather they add clarity to an existing approach.
4. Deleted text is shown via ~~strike through~~, whilst new text is underlined.

(A). TEXT AMENDMENTS AS A RESULT OF CONSIDERATION OF FOCUSED CHANGES REPRESENTATIONS:

Site Allocations Reference / Section	Amendment Required
STRENGTHENING ECONOMIC PROSPERITY	
Proposal S/1	Amend Focused Change SC6 as follows: 'Acceptable uses are retail and leisure uses. Approximately 7,000 sqm (gross) of retail floorspace is acceptable, except for the sale and display of clothing and footwear, unless ancillary to the main use of an individual unit. The nature and scale of development should aim to maximise the use of the site and ensure no significant adverse impact on Hemel Hempstead town centre. The sale and display of clothing and footwear is not acceptable, unless ancillary to the main use of an individual unit.'
PROVIDING HOMES AND COMMUNITY SERVICES	
Policy LA1	Delete the following text (suggested as Focused Change MC18): 'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.' and replace with the following text: <u>'The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate compliance with this Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.'</u>
Policy LA2	Delete the following text (suggested as Focused Change MC21): 'Limit housing to two storeys, except where a higher element would create interest and focal points in the street scene, and would not be harmful to the historic environment.' and replace with the following text: <u>'Limit housing to two storeys, except where two and a half storey housing would create interest and focal points in the street scene, and would not be harmful to the historic character.'</u>
Policy LA3	Delete the following text (suggested as Focused Change MC25):

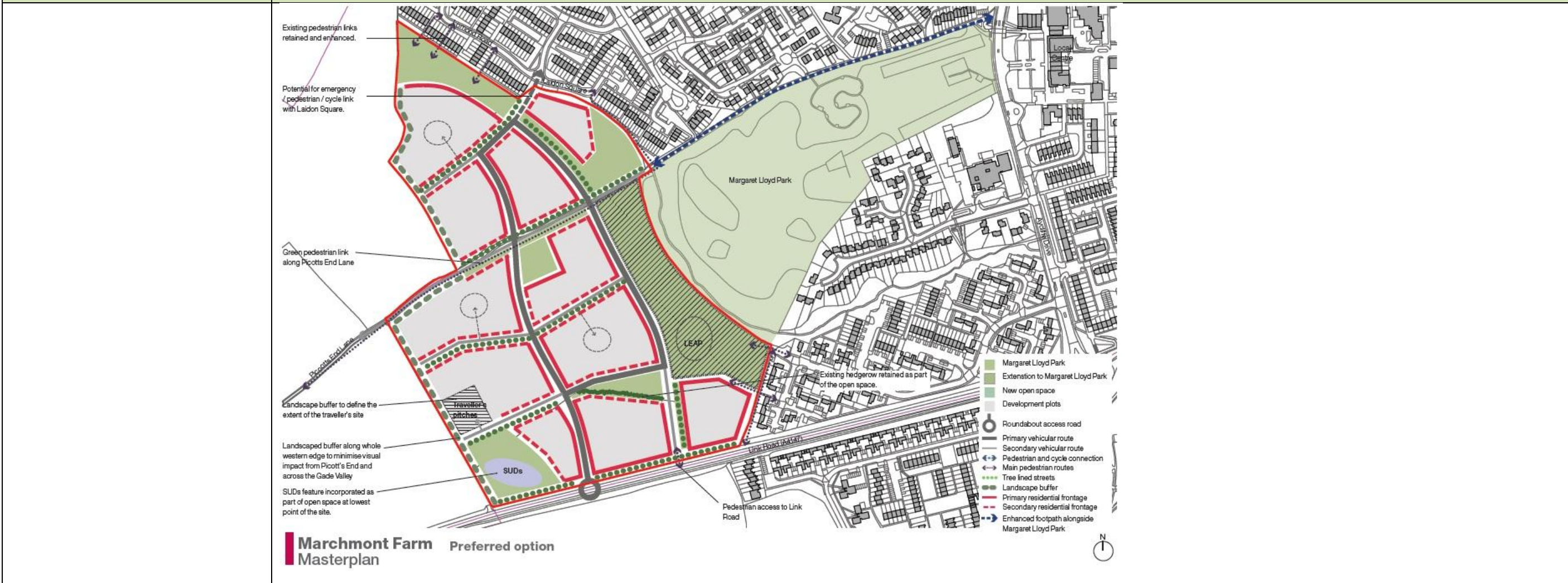
Site Allocations Reference / Section	Amendment Required								
	<p>'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole, followed by a series of reserved matters (or full applications) for each phase (or series of phases). This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</p> <p>and replace with the following text:</p> <p><u>'The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate compliance with this Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.'</u></p> <p>Amend MC24 (a Key Development Principle for the site) as follows :</p> <ul style="list-style-type: none"> • Design, layout and landscaping to <u>mitigate the impacts on</u> the archaeological, heritage and <u>ecological</u> assets within the site <u>and safeguard those</u> adjoining the development. 								
Policy LA4	<p>Delete the following text (suggested as Focused Change MC28):</p> <p>'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</p> <p>and replace with the following text:</p> <p><u>'The Council will require that when a planning application or planning applications are brought forward for the allocation they demonstrate compliance with this Master Plan and a comprehensive approach to the development of the allocation, including the nature and timing of delivery of community infrastructure and other planning obligations.'</u></p>								
Policy LA5	<p>Delete the existing text for bullet point 3 at the start of the policy, as follows:</p> <p>'An extension to the cemetery of around 1.6 hectares, in the western fields, and also car parking and associated facilities for the cemetery in the eastern fields development area.'</p> <p>and replace by the following text, as it is uncertain whether the associated facilities for the cemetery will be located in the new car park or within the existing cemetery:</p> <p><u>'An extension to the cemetery of around 1.6 hectares, in the western fields, and also car parking for the cemetery in the eastern fields development area.'</u></p>								
Policy LA5	<p>Delete the following text (suggested as Focused Change MC34):</p> <p>'The Council's expectation is that the development will initially be progressed as an outline application covering the site as a whole. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</p> <p>and replace with the following text:</p> <p><u>'The Council expects that the development of the site will be progressed by a hybrid planning application, which seeks full permission for the proposed housing development and outline permission for the other elements of LA5. This is in order to secure a comprehensive approach to the delivery of the scheme and associated works and contributions.'</u></p>								
Proposal L/4	<p>Amend the text of Proposal L/4 (Focused Change SC10) as follows:</p> <table border="1" data-bbox="647 1780 1774 1900"> <tr> <td colspan="2">Proposal L/4</td> </tr> <tr> <td>Location</td> <td>Dunsley Farm, London Road, Tring</td> </tr> <tr> <td>Site Area (Ha):</td> <td>2.7</td> </tr> <tr> <td>Planning</td> <td>Proposal linked to the potential future redevelopment of Tring School</td> </tr> </table>	Proposal L/4		Location	Dunsley Farm, London Road, Tring	Site Area (Ha):	2.7	Planning	Proposal linked to the potential future redevelopment of Tring School
Proposal L/4									
Location	Dunsley Farm, London Road, Tring								
Site Area (Ha):	2.7								
Planning	Proposal linked to the potential future redevelopment of Tring School								

Site Allocations Reference / Section	Amendment Required
	<p>Requirements: to make provisions for detached playing fields in the event that they should be required as result of the school's physical expansion. The site should provide sufficient space for playing pitches for outdoor sports in order to meet the school's requirements and Sport England <u>standards guidance</u>. These playing pitches will be also be made available for community use. <u>Existing hedgerows to be retained and enhanced where possible to minimise any impact upon the ecological value of the site, including existing wildlife corridors. Pedestrian access to the site to be via adjacent cricket pitch. Consideration to be given to the provision of a pedestrian crossing point on Station Road to ensure safety of movement between the site and school.</u></p>

(B). TEXT AMENDMENTS REQUIRED AS A RESULT OF CHANGES MADE TO DRAFT MASTER PLANS:

Site Allocations Reference / Section	Amendment Required
Policy LA1	<p><i>Revised site layout to recognise existing pedestrian link between Link Road and Margaret Lloyd Park within indicative block layout; and to remove reference to a specified landscaped buffer on the western boundary of the site to enable a natural delineation along the planted settlement edge.</i></p>

Site Allocations Reference / Section	Amendment Required
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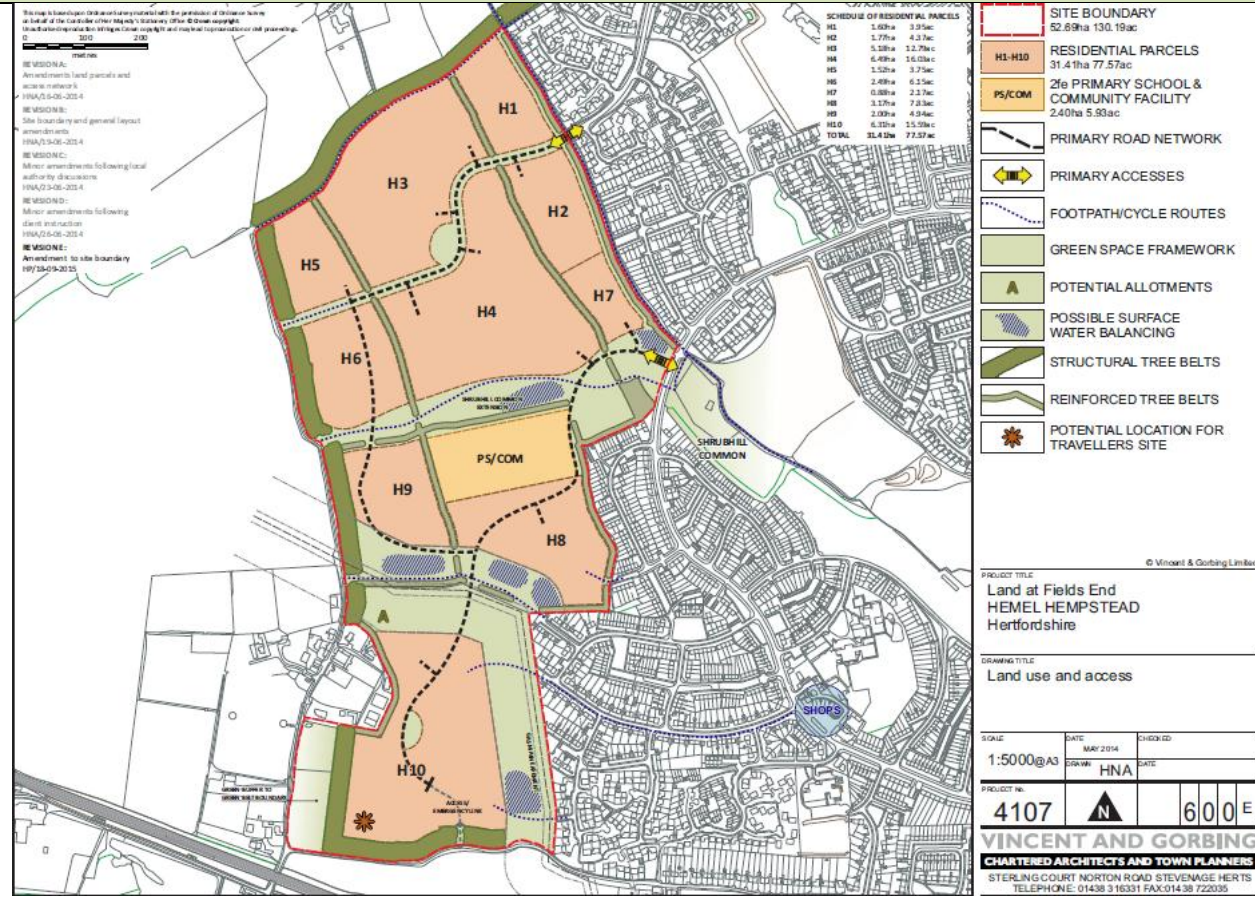


Policy LA2	<i>Minor amendments to framework plan to make clear that there is no vehicular access linking with existing residential areas via Townsend).</i>
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Site Allocations Reference / Section	Amendment Required	
		
<p>Policy LA3</p>	<p><i>Minor amendments to framework plan to remove reference to footpath access extending outside of the master plan area, to ensure consistency with the updated plan in the Master Plan document and to show correct extent of site in south west corner to tally with site boundary on Policies Map and master plan.</i></p>	

Site Allocations Reference / Section

Amendment Required



Policy LA5

Replace existing indicative layout map with amended version below which deletes the words 'and other facilities' from the label for 'Cemetery car park', for consistency with changes made to the draft master plan.

Site Allocations Reference / Section	Amendment Required
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Policy LA5

Delete the existing text for key development principle 11, as follows, for consistency with changes made to the associated master plan:

~~'Locate car parking (at least 30 spaces) and other facilities for the cemetery in the development area, adjacent to the cemetery extension.'~~

and replace with the following text, as it is uncertain whether the other facilities for the cemetery will be located in the new car park or within the existing cemetery:

'Locate car parking (at least 30 spaces) for the cemetery in the development area, adjacent to the cemetery extension.'

Table 5: Responses not considered in the Report of Representations

a) List of those making ‘No Comment’

None

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

Martin Hicks, Hertfordshire County Council Ecology made 3 comments as follows. No changes are suggested to the SA/SEA as a result of these comments for the reasons set out in the Sustainability Report Submission Statement (January 2016).

<p>1. LA4 will destroy a moderately sized Wildlife Site quality grassland. The impact and implications of this are described thus: <i>The site is greenfield and there would therefore be loss or damage of some habitats, including high quality grassland. Retaining the pond, mature planting on to Shootersway and providing a coherent, and wildlife friendly open space network that links to the surrounding countryside could help to mitigate these effects. As could potential developer contributions towards offsetting the loss of wildlife resource.</i></p> <p>That some habitat works ‘could help mitigate’ these effects as ‘could potential’ developer contributions is, in my view, a very weak response given the SA objective ‘<i>To protect, maintain and enhance biodiversity...at all levels</i>’.</p> <p>Consequently the ‘<i>minor adverse impacts</i>’ assessment is wholly inappropriate in my opinion, certainly at the District level, which will lose a high quality grassland unless compensation is provided. I consider this should be viewed as very unsustainable given the weak claims on compensation.</p> <p>In any event I remain very concerned this compensation will not happen in practice and that, consequently, the amendments I have suggested are therefore required to help ensure it does.</p>
<p>2. Proposed amendment SC10 –effectively a Change of Use from farmland to formal sports pitches - is considered to have <u>no predicted effects</u> on most SA objectives, including Biodiversity or Landscape & Townscape.</p> <p>The longer-term potential for this school and community facility to require floodlighting consistent with other sports uses in the area is clearly an ecological and wider environmental issue. So is the retention or enhancement of associated hedgerows. I consider this should be given at least an uncertain assessment – as there <i>will</i> be impacts of different kinds associated with this proposal which will need to be managed if, as or when the proposal is implemented.</p> <p>Furthermore, such a Change of Use will clearly change the local character of the area in both form and function, from rural farmland to formal leisure facility. This <i>must</i> have an impact on the local townscape and landscape by definition, although again, this could be managed as necessary. Consequently I would have considered an uncertain assessment to have been more appropriate.</p> <p>On this basis I consider the assessments should be amended to reflect these implications.</p>
<p>3. I also take this opportunity to again highlight my concerns regarding the Turners Hill area of Hemel Hempstead.</p> <p>In this respect I note the Map Amendments for The Sustainable Development Strategy, include: <i>Page 22: amend MU/2 to show enlarged area previously designated at H/8.</i></p> <p>This is defined as: <i>Mixed Use Development</i> <i>MU/2: Hemel Hempstead Hospital Site, Hillfield Road, Hemel Hempstead – amended to show larger area (comprising addition of The Dell)</i></p> <p>This area includes two large Wildlife Site grasslands known as Paradise Fields Central (Ref 66/013/01) and a locally important wooded hollow (The Dell) which has supported protected species. These issues should have been drawn to the attention of the LPA in previous comments and have been considered accordingly.</p> <p>However I take this opportunity - given the map amendment affecting these areas - to highlight the fact that these represent important ecological resources within Hemel Hempstead and should not be lost to development. The adjacent Turners Hill (H8) remains as a Housing Proposal site and will degrade the adjacent sites anyway if developed, by removing adjacent habitat and introducing additional local disturbance.</p> <p>Although the grassland was of insufficient quality to justify Wildlife Site status when originally surveyed, given the size, shape and location of the Dell, I am unclear as to why the Dell was retained at all within a planning site for mixed use development. The opportunity could have been taken to remove it entirely unless some form of development is planned, which would inevitably lead to</p>

further environmental degradation locally.

Perhaps the rationale behind this needs explaining if the intention is to retain these local ecological resources.