

Core Strategy Pre-Submission Responses

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491185	Sheila Doyle	Friends of the Earth				Forward	Policy CS32		Objecting	No	No	a) Justified	The Sustainability Appraisal Report states clearly that : As a result of proposed levels of housing and economic growth a number of adverse and uncertain effects have however, been identified. There will be increases in level of land take which could have localised adverse effects on environmental factors such as biodiversity, soils , landscape and townscape. There are also likely to be increases in the level of water abstraction, which in an area already identified as "over-abstracted" could become a more significant issue over time. Housing development will result in an increase in greenhouse gas emissions from energy used in new housing and associated activities.	Dacorum is situated in the driest region in the British Isles and is heavily populated so going for excessive numbers of housing raising the question where is the water coming from ??  Also building on the Greenbelt decreases biodiversity.  Too much housing leads to more carbon being produced and there is also more air pollution	Yes, I wish to participate at the oral examination	Because we prefer personal representation .
491185	Sheila Doyle	Friends of the Earth				Forward	CS 14		Objecting	No	No	a) Justified	No mention of renewable technologies.	A range of renewable technologies , solar , wind and geothermal.  More emphasis on local food production and distribution.  Ensuring Dacorum is kept GM free.	Yes, I wish to participate at the oral examination	Prefer personal representation
611657	Messrs M&D Gardener		611650	Mr John Heginbotham	Stimpsons	Forward	CS2		Supporting	Yes	Yes		As Representation on behalf of Taylor Wimpey by Martin Friend	As Representation on behalf of Taylor Wimpey by Martin Friend	Yes, I wish to participate at the oral examination	Our client's land is a significant component of LA3
602885	mr geoff brown					Summary of the Strategy	The Strategy	1	Objecting	Yes	No	a) Justified	Plan proposes too many new homes yet talks about maintaining quality of life in small market town etc. local infrastructure, roads, services, parking, facilities cannot support such an increase. Developers should be restricted. If new entrants are allowed it should be on an individual case by case planning application basis and only	as mentioned above	Yes, I wish to participate at the oral examination	strategy vs policy

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													one off developments allowed organically not mass development. Strategy proposed is in direct conflict with formulated policy. In addition, it seems as if the consultation process is designed as so unwieldy that it is intended to put people off 'consulting'. I believe this whole process needs an independent inquiry with the interest of local people properly represented. It appears that the council and it's advisors are riding roughshod over local opinion.			
366491	Mr Brian Worrell					Summary of the Strategy	whole plan	1	Objecting	Yes	No	b) Effective	This draft core strategy is an obvious follow on from the previous strategy. However, I suggest there are areas of detail where the whole of Dacorum could benefit with more vision. Stephen Holmes stated that he wants to make Hemel Hempstead 'revolutionary' again and I support him on this. However, his vision needs to take in the whole of Dacorum and its many little know assets. I have tried to add my views in the following sections where relevant.	Not applicable as I have commented on the Forward in general - see above.	Yes, I wish to participate at the oral examination	It is important to hear all sides of the debate and sound argument should enhance this Core Strategy.
211055	Mr Matthew Wood	Hertfordshire County Council				Summary of the Strategy	Section 1	1	Supporting	Yes	Yes		From a service provision perspective it is clearly evident that as Local Planning Authority (LPA), Dacorum Borough Council, (DBC), has responded very positively in the PSCS to previous HCC service representations and facilitates opportunities for flexible service delivery to 2031, whoever may provide those services in the future.  Therefore, from a Hertfordshire Property perspective the document is considered to be fundamentally sound.		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation

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																document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
211055	Mr Matthew Wood	Hertfordshire County Council				Summary of the Strategy	Section 1	1	Supporting	Yes	Yes		<p>HCC regard the Pre Submission Core Strategy to be a well founded document which is demonstrably ;</p> <p>Justified Based on robust and credible evidence The most appropriate strategy Effective</p> <p>Subject to the caveats contained within this document, the Core Strategy is</p> <p>considered to be a sound document. Thank you for the continuing opportunity to comment on the Pre Submission Core Strategy and the positive way in which HCC requirements have been fulfilled within the document.</p> <p>From a services perspective, we look forward to continuing the same</p>		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate

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													constructive partnership working in relation to the Examination in Public, and in respect of subsequent Site Allocations and Development Management Policies DPDs.			funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EIP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Summary of the Strategy	Section 1	1	Supporting	Yes	Yes		<p>The Trust is extremely supportive of the Council's efforts to ensure that it has up to date local planning policies in place, through the Core Strategy Development Plan Document (DPD) and other DPD's. The Trust supports the Council's objectives for achieving sustainable economic development, and providing the context through the planning policy framework for businesses and heritage bodies to thrive and grow. In addition that there must also be a recognition that the traditional forms of employment are changing, that mixed uses are much more likely to be viable, and that housing need is growing for both market, and affordable housing.</p> <p>A considerable period has passed since those previous representations were made, and the economic context for regeneration and economic development in the Borough has much worsened. In addition the government has published a draft National Planning Policy Framework (NPPF) for consultation, has issued a final Planning Policy Statement 4 (PPS4) as a significant material planning consideration in future applications and local planning policy</p>	<p>In this context, the Paper Trail Trust considers that the Council must have regard for all three major national planning policy statements, and new law, and that they should ensure that the Core Strategy in its final Submission Version is properly referenced back to all three where necessary.</p> <p>The Trustees are not convinced that this is the case in the current Pre-Submission documentation. In summary, in relation to the various component Chapters of the Core Strategy, there does not appear to be a reference to supporting national policies in the NPPF; PPS4 or to the relevant parts of the Localism Act anywhere. Surely the Core Strategy, in order for it to be sound, must explicitly demonstrate how the requirements of the above national planning guidance and new law are being followed and applied.</p>	No, I do not wish to participate at the oral examination	

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													formulation, and the new Localism Act is now law. This now provides for the imminent abolition of the Regional Spatial Strategies, and their removal from development plans as a material planning consideration. The government has also earlier this year published 'Planning for Growth' in March 2011.			
629143	Mr Chris Briggs	St Albans City & District Council				Summary of the Strategy	Section 1 - Summary	1	Supporting	Yes	Yes		<p>St Albans City &amp; District Council is pleased to support the thrust of the Dacorum Core Strategy and support the joint working for the East Hemel Hempstead Area Action Plan (EHHAAP). This Council is also pleased that the October 27 Member and officer meeting confirmed the appropriateness of and support for joint working on the EHHAAP, as reflected in the Dacorum Core Strategy.</p> <p>There is only one aspect of the Pre-submission Core Strategy where specific clarification is considered necessary as it moves to the submission stage. During discussions between Manpreet Kanda of this Council and Richard Blackburn of Dacorum on 29 November, it was agreed that Dacorum would amend the text in the Dacorum submission Core Strategy and Figure 22 to refer to the (currently shown) EHHAAP boundary, where it includes land in this District, as an "indicative study area". The precisely defined EHHAAP boundary, appropriate uses and their locations will be agreed through continued joint working between Dacorum Borough and St Albans City &amp; District Councils and we look forward to participating further in such working in the near future.</p>		No, I do not wish to participate at the oral examination	

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610088	Mr Martin Hicks	HBRC				Paragraph	1.1	1.2	Objecting		No	b) Effective	Paragraph 1.1 should mention the over-arching approach of sustainable development. The challenges should reflect this; simply referring to growth as sustainable is insufficient. Sustainable Development encompasses a range of considerations.	The core strategy does not sufficiently reflect 'sustainable development' as a key driver. The very first sentence of the Ministerial Foreword to the NPPF say 'The purpose of planning is to achieve Sustainable Development' yet this is not sufficiently highlighted within the Core Strategy. The text could better read 'In seeking to achieve sustainable development, the purpose of the core strategy...'	No, I do not wish to participate at the oral examination	
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	1.2	1.2	Supporting	Yes	Yes		We welcome and support the identification of the challenges faced by the Core Strategy, with particular regard to (1) Balanced and sustainable growth and (4) Strong, inclusive communities. The Trust considers that the Inspector will need to consider whether the submission Core Strategy will be effective in addressing these challenges.			
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Paragraph	1.4	1.4	Objecting		No	b) Effective	This is in <b>effective</b> , in that it runs contrary to other elements of the Strategy, namely:  <b>1.17</b> "maintain the openness of the areas of the borough designated as Green Belt or Rural Area;"  <b>1.18</b> "Maintaining the countryside helps to prevent towns and villages from merging into one another and ensures that they retain their distinctive characters. "  <b>6.2</b> Strategic Objective 12 To protect and enhance Dacorum's distinctive landscape character,	Comply with the majority of respondees to Dacorum Council's planning consultation in November 2010 who favoured the lower growth figure of "Option 1"	No, I do not wish to participate at the oral examination	

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													<p>open spaces, biological and geological diversity and historic environment.</p> <p><b>8.29</b> "A strategic review of Green Belt boundaries is not required, although some small-scale releases will be necessary to meet specific local needs or to correct minor anomalies."</p> <p><b>Policy CS2</b></p> <p>"Extensions to defined settlements . . . must . . . respect local character and landscape context;"</p> <p><b>Policy CS5</b></p> <p>"The strict application of national Green Belt policy which permits appropriate development will be used to protect openness, local distinctiveness and the physical separation of settlements.</p> <p>No general review of the Green belt boundary is proposed, although local allocations (under Policies CS2 and CS3) will be permitted). "</p> <p><b>27.11</b> "Flexibility within planning policies is necessary to enable . . . adaptation to changing national advice and planning policies;" (Large-scale releases of Green Belt land, a direct consequence of this level of housing growth are</p>			

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													<p>irreversible and therefore inflexible.)</p> <p>See our response to 1.10, which spells out why, for example, the development at West Hemel Hempstead, which is necessitated by this level of growth, fails to meet the above-quoted environmental objectives.</p> <p>For comparison, the options for annual averages given in the consultation on the Core Strategy of DBC's Local Development Framework in November 2010 were Option 1 (no Green Belt landtake): 370 and Option 2: 430.</p> <p>Previously, the annual average figures affecting Dacorum and set out into the East of England Plan 2009 consultation were (2011-2031): 300 (Scenarios 1 and 2) and 620, 500 (Scenarios 4 and 5 respectively).</p> <p>The majority of respondees to Dacorum Council's planning consultation in November 2010 favoured the lower growth figure of "Option 1" . It is disappointing, less than a year later, that the Council have chosen Option 2 for the pre-Submission stage, and that reportedly the Council leader doesn't believe that "Option 1 is something we could defend" - presumably from legal or procedural challenges which might argue that it was inconsistent with Government Policy. In our response to 14.7 we argue that this fear is unjustified, and that a lower growth figure is indeed consistent with Government policies.</p>			



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488516	mr Hugh siegle					Paragraph	1.4	1.4	Objecting		No	a) Justified	<p>The proposed number of new residential units is not appropriate for the current infrastructure in the Borough.</p> <p>In particular the Borough's water supply which is entirely from aquifers is under pressure now as a result of new development that has taken place and the change to our climate conditions. The latter varies and periods of dry weather and possible drought conditions are not unknown but there are sufficient official warnings that more extreme weather conditions will prevail in the future to indicate that the aquifers will not cope with the growth in population, of circa 26,000 based on Borough average household statistics..</p> <p>The Borough plans to restore and maintain the flow of the chalk streams which are clearly suffering now. No details are supplied and there is no mention of out of area water supplies being provided.</p> <p>The proposed growth in new housing will not be sustainable</p>	Reduce the number of new homes allowed until such time as water supply capacity is increased to a guaranteed level	No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	1.4	1.4	Supporting	Yes	Yes		BRAG endorses the statistical data which underlies the housing figures for the borough as a whole. DBC's approach has integrity being based on census and ONS figures. DBC accept that numbers per household will decrease and their figures do take this in to account.		No, I do not wish to participate at the oral examination	
223914	Mrs Nichola Mills					Paragraph	1.4 Providing around 420 new homes between 2006 and 2031	1.4	Objecting	No	No	a) Justified	No housing should be built on greenbelt. The other option for housing would have enabled all housing to have been built on brownfield sites. This option must be taken.	If the council had gone for the lower option , 7000 houses would all have been built on brownfield sites. Under the higher option 1550 will be built on greenbelt land, leaving the remainder to be built on brownfield sites	No, I do not wish to participate at the oral examination	

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610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	1.8	1.8	Supporting	Yes	Yes		In the view of BRAG the Settlement Hierarchy is eminently reasonable and supports DBC in resisting pressure from developers to remove Berkhamsted from the same classification as Tring and thus allow the town to be used as a "strategic development opportunity". Berkhamsted and Tring are ancient market towns of a very different character from Hemel Hempstead, which is a Mark 1 New Town. Any infilling in Berkhamsted and Tring has to be handled with sensitivity because of the architectural heritage and lack of infrastructure to cope with large scale development, not to mention being virtually surrounded by Green Belt and the Chilterns AONB, which is of intrinsic value to wildlife and of great recreational value to residents and visitors. It is imperative to protect the nature and character of both Market Towns. This Settlement Hierarchy helps accomplish that aim.		Yes, I wish to participate at the oral examination	It is understood that certain developers are pushing DBC to change the Settlement Hierarchy and specifically to re-classify Berkhamsted as a town that can be used in a larger supporting role to Hemel Hempstead. It is important that the views of Berkhamsted residents are considered.
211434	Ms Joanne Deacon	Chipperfield Parish Council				Paragraph	1.8	1.8	Supporting	Yes	Yes		We support the settlement hierarchy which ensures that development within small villages such as Chipperfield is subject to carefully controlled restraint.		No, I do not wish to participate at the oral examination	
366491	Mr Brian Worrell					Paragraph	1.10	1.10	Objecting	Yes	No	b) Effective	I note that under New Services there is no mention of the need for a Heritage Centre/Museum for Hemel Hempstead. Indeed there seems to be no strategy for providing public access to any of our heritage except in Tring and the museum store in Berkhamsted. Heritage is a key reason why people would want to visit Dacorum and some joined up thinking is needed for an attractive network of heritage sites (of which	I suggest the words 'new heritage centre' is added. I suggest these words rather than 'museum' as this can be seen as a bit elitist.		

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													there are many) and museums.			
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Paragraph	1.10	1.10	Objecting	No	b) Effective	<p>This is in <b>effective</b>, in that it runs contrary to other elements of the Strategy, as listed in our response to 1.4.</p> <p>For example, the return to consideration of a West Hemel Hempstead development is disappointing, following decades when generations of planners have quite rightly ruled it out.</p> <p>Although the current consultation documents do not appear to include a map defining it, the 2010 Core Strategy consultation document described "West Hemel Hempstead" as "between 450 (northern area only) and 900 new homes". The 450 are presumably those described by Taylor Wimpey UK Limited in their 2010 consultation response as "land within the ownership control of Taylor Wimpey" and identifiable from their map as land extending in the direction of Pouchen End Lane from the line of the footpath from near the Long Chaulden Adventure Playground to the top end of the existing Fields End estate.</p> <p>Development of this area would block off one of the most valuable "Green Lungs" designed in the Master Plan for the creation of Hemel Hempstead.</p> <p>It is bordered by the Local Nature</p>	Remove proposals to re-designate existing Green Belt land.	No, I do not wish to participate at the oral examination		

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													<p>Reserve of Shrubhill Common, for which it provides a valuable wildlife corridor. At the November 08 meeting of Friends of Shrubhill Common Martin Hicks of the Herts Biological Record Centre confirmed the findings of the Centre's 2006 Urban Study, commissioned by DBC, in saying that were development to occur, a corridor to the North/NW of the LNR at least as wide as the first field bounded by FP20 would be needed in order to maintain the viability of the LNR.</p> <p>The area's footpaths and Pouchen End Lane currently provide a valuable and well used informal recreational amenity for Warners End, Chaulden and Fields End residents.</p> <p>Development here would be highly visually intrusive across and along the Bulbourne valley. It was recommended against on landscape grounds by the Inspector into the Borough Plan in 2000 and before that by the Council's own planning consultants. In 2000 a 1500-strong petition of Chaulden and Warners End residents opposing the loss of Green Belt status was raised by Friends of Shrubhill Common and presented to the Council.</p> <p>Development would also increase pressure for a Northern Bypass which would be of yet further substantial detriment visually and in terms of amenity.</p>			

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													In Section 1.4, Hemel Hempstead Local Allocation Assessment, of Appendix F of the accompanying Sustainability Appraisal Report "West Hemel Hempstead" achieves only three ticks out of 20 sustainability appraisal objectives, and of these three, one is because the development will provide social housing and the other two are little more than aspirations that, because of its size, it will attract new local facilities.			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	1.10	1.10	Supporting	Yes	Yes		We welcome and support the high level strategy for Hemel Hempstead.			
623313	Mr John Clark	CBRE Global Investors	623314	Mr Jon Stoddart	CBRE Ltd	Paragraph	1.10	1.10	Supporting	Yes	Yes		The evidence base for the Core Strategy prepared to date (employment land study and SHLAA etc) supports the release of Units 1-13 Frogmore Industrial Estate from employment to a residential use.  The Council also has aspirations to bring forward our clients site, 74-78 Wood Lane End in Hemel Hempstead, for alternative uses in order to provide a 'cafe culture' in the heart of Maylands. We continue to promote the sites for residential-led development through the Local Development Framework process.			
366491	Mr Brian Worrell					Paragraph	1.11	1.11	Objecting	Yes	No	b) Effective	It seems to me that a brief description of 'new sports ground' is required so that some idea of what sports and activity this new sports ground will support. It is known that there is a need for more sports facilities and they need to be placed where the new housing developments are taking place.	I suggest some brief description is added to the words 'new sports ground'		
214649	Mr	Jehovah's Witnesses				Paragraph	1.11	1.11	Objecting		No	b) Effective	Reference is made to provision of large extra numbers of housing to	Yes, I wish to		The need for D1-h facilities is often

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	John Greenaway											e	meet expansion needs, but fails to make allocation for basic community needs. While it refers to a leisure facility it does not indicate how the growing need for basic D1 and D1-h community needs will be met. Especially is D1-h being lost to development - a trend that must be reversed or it will have severe consequences in the future. To avoid this all large scale developments should contain at the planning stage sufficient provision of areas designated D1 plus sufficient D1-h. On this point to save space some may recommend provision of a 'community church' but this rarely works out. Not only would Muslim and Jews hardly share a facility but different Christian groups too would face equally impossible problems with this - to a great extent each group would probably require their own facilities. These clearly greatly improve the attitude and lifestyle of many people while the news is constantly filled with the results of not having this available.		participate at the oral examination	overlooked due to pressures to provide housing numbers, I would welcome the opportunity to explain why I feel this is such an urgent need unless it has been taken 'on board' by the time of the final draft.
490893	Mrs christine kavanagh					Paragraph	1.10	1.11	Supporting	Yes	Yes		Instead of building new primary schools, will the council be reopening those schools it closed in 2008?		No, I do not wish to participate at the oral examination	
488516	mr hugh siegle					Paragraph	1.11	1.11	Objecting	No	a) Justified		There is no mention of culture in this summary of areas for special attention, specifically paragraph a). The Council has promised to provide a replacement for the Pavillion. Its demolition has left the Borough without a focal point for this important factor in the quality of life and health of the community.  Not an objection ,rather a request for clarification as to the meaning of 'General Hospital' given the local Health Trust's apparent opposition		No, I do not wish to participate at the oral examination	

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													to providing this substantial Borough with proper health facilities. Are we to have a proper hospital again?			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	1.11	1.11	Supporting	Yes	Yes		We welcome the recognition that new community facilities will be required in the Town Centre.			
610834	Mr Norman Thomas Jones					Paragraph	1.11	1.11	Supporting	Yes	Yes		Particularly support the statement in 1.11 that 'The network of open land will be maintained'.		No, I do not wish to participate at the oral examination	
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	1.11	1.11	Supporting	Yes	Yes		Acknowledgment of the need for a new primary school within the town centre to meet the demand for additional school places arising from 1800 new homes is welcomed and supported.	The Core Strategy appropriately identifies a linkage between provision of 1000 new houses and provision of additional school capacity to serve it.  It must be stressed that any development in St Albans District Council's area may require the provision of additional school places to meet the needs arising from child yield coming out of that development. This would be additional capacity over and above that factored in to the PSCS.	Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the

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																delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
398357	Mr Ian Richardson	Box Moor Trust				Paragraph	1.11	1.11	Objecting	Yes	No	a) Justified	<p>The Trust read the Pre-submission Core Strategy Documents with interest and was particularly intrigued as to how the two recent studies undertaken on behalf of the local authority by consultants BDP might be considered. (The Two Waters Study and the Station Gateway study).</p> <p>It was with some alarm that it found that there is scant reference the scale of local consultation and to the consultants' investigations and recommendations.</p> <p>The Trust therefore feels that it should emphasise the value of the review of the Two Waters Study that clearly indicated the potential for the revitalisation of this area by a combination of investment in, and enhancement of the management of some of the open spaces. As importantly it also recalls the experts identifying the way in which high quality buildings to could enhance this southern gateway to the town.</p> <p>It was at a presentation in 2010 to senior officers, councillors and stakeholders that James Doe, Assistant Director for Planning, Development and Regeneration, noted that this study was a valuable framework for future action. It seems unfortunate therefore that no reference of any of the detail can be</p>	<p>Justified -</p> <p>The Two Waters Study was founded on a robust and credible evidence base involving:</p> <ul style="list-style-type: none"> <li>- Evidence of participation of the local community and others having a stake in the area</li> <li>- Research/fact finding: the choices made in the plan are backed up by facts and is therefore serving of inclusion.</li> </ul> <p>The Two Waters Study clearly indicated the potential for the revitalisation of that area by a combination of investment in and the enhancement of the management of some of the open spaces. It also importantly also identified the scope for the inclusion of high quality buildings that would enhance this southern gateway to the town.</p>	No, I do not wish to participate at the oral examination	



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													discerned other than the line in the page four of the Introduction and similar words in the Place Strategy for the town.  <i>(d) Green Spaces</i>  <i>The network of open land will be maintained. Public open spaces will be improved, particularly the greenspace in the Two Waters area of the town.</i>  A similar fate seems to have befallen the Station Gateway review where a range of stakeholders was consulted and the consultants' work and subsequent proposals now seem to be marginalised.  For the comprehensive planning of the regeneration of the town these area studies should be given their due weight.			
623313	Mr John Clark	CBRE Global Investors	623314	Mr Jon Stoddart	CBRE Ltd	Paragraph	1.11	1.11	Supporting	Yes	Yes		CBRE supports Hemel Hempstead being the main Centre for Development and Change in the borough and the focus for new homes, jobs and infrastructure. CBRE supports local housing allocations at West Hemel Hempstead, Marchmont Farm and the Old Town and supports the Maylands Business Park being the focus for employment growth.			
366491	Mr Brian Worrell					Paragraph	1.13	1.13	Objecting	Yes	No	b) Effective	There are two concerns. First with the paragraph on Berkhamsted. Somewhere the sports to be accommodated on the 'additional playing pitches' needs to be defined, plus I suggest there is possibly a need for more indoor sports facilities.  This is even more relevant to Tring. The existing indoor hall at Tring School is clearly sub standard and			

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													there is a defined need for both indoor and outdoor facilities to cater for sport in Tring. The Tring Sports Forum has done a lot of work on this and no doubt will submit a detailed comment on this section. Additionally, I assume the 'new detached playing fields' will be part of the schools increased facilities. It is hoped that these will be available to the public as well.			
488516	mr hugh siegle					Paragraph	1.13	1.13	Objecting	No	a) Justified		While I support the designation of Berkhamsted and Tring as market towns and the clear distinction from Hemel Hempstead I consider the amount of proposed new development for Berkhamsted is excessive and will put undue pressure on the local infrastructure, parking provision and utilities, in particular the town's water supply. There will be an adverse environmental impact on the town from the loss of some Greenbelt and Green land, increased car useage and congestion	Reduce the amount of planned new development allowed to less than 1,000 and restrict all but minor development until the inadequacies of the town's water supply policy are addressed. It has frequently been the case that across the country development has been restricted if foul and surface water disposal facilities were insufficient to cope with further demand. This approach should be applied to the water supply		
488516	mr hugh siegle					Paragraph	1.13	1.13	Objecting	No	a) Justified		Berkhamsted is a market town and it is important to retain this designation, however the intention to allow 1180 new homes, plus the discounted 'windfall sites' which will inevitably arise, will have a significant environmental impact. Current infrastructure is inadequate and this scale of growth will increase car useage, pollution and congestion as well as putting unacceptable strain on natural resources, in particular water supply.  The Hanburys site is in Greenbelt and should not be built on	Reduce the density of proposed development on the strategic site at Durrants Lane and remove reference to the Hanburys site as a local allocation	No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	1.13 (a)	1.13	Objecting	Yes	No	a) Justified	While BRAG fully endorses the statement –'A second tier' of market towns will meet their local housing needs, we believe the 1180 number of new homes for	1.13 (a) should read:  Berkhamsted – will have around 750 new homes. This includes the	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning

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													<p>Berkhamsted is unsound and is excessive to meet the stated aim for the -population to remain stablell in 8.9 Table 1.</p> <p>As commented in 1.4, BRAG endorses the statistical data which underlies the housing figures and DBC's own figures show that Berkhamsted only requires 750 new dwellings to maintain the population up to 2031.</p> <p>However, DBC's approach should be contrasted with figures put forward by the promoter of a site in South Berkhamsted, which DBC have already ruled out on good planning grounds. In these figures, Berkhamsted's population baseline has been grossly inflated, thus taking estimates of housing need into the realms of fiction.</p> <p>DBC should be confident in defending their calculations, which are robust being based on census and ONS figures, and the 750 target for new homes in Berkhamsted over the period 2006-2031. Contrary to a certain allegation, DBC have not taken into account windfall sites in the first ten years. In addition the actual number of houses in Berkhamsted in 2006 reasonably demonstrates that the true need is actually below 400 new homes. That plus the existence of a number of newly built vacant properties in the town provides robust evidence that 750 is actually erring on the side of caution with an in built safety net.</p> <p>Given that the true need for Berkhamsted is no more 750 new homes the Green Belt local allocation at Hanburys will not be required and should be left out of the Core Strategy.</p>	strategic site at Durrants Lane/Shootersway (Egerton Rothesay School), which will provide new homes, improvement to the school and additional playing pitches. Two 'education zones' have also been identified on the edge of the town to ensure the future primary age schooling needs are met. Existing employment land will be retained.	n	decisions that will affect their environment and quality of life.

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611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	1.13	1.13	Supporting	Yes	Yes		We welcome the clear statement of the function of the market towns of Berkhamstead and Tring and their need to provide additional community facilities.			
611410	Mr Thomas Lloyd-Evans					Paragraph	1.13	1.13	Objecting	Yes	No	a) Justified	1,180 homes is a material increase for Berkhamsted. Much more detail should be provided to justify how this number was arrived at. Existing infrastructure is already insufficient for the current population. Clearly overarching borough housing targets need to be met, but there are more appropriate places to build than Berkhamsted.	Detailed assessment of needs should be undertaken and consulted upon to determine the proper target.	No, I do not wish to participate at the oral examination	
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	1.13	1.13	Supporting	Yes	Yes		<p>HCC welcome and support the identification of two 'education zones' in Berkhamsted. DBC have responded positively to the evidence of need advanced by HCC in previous representations relating to the settlement.</p> <p>The wording at para 1.13 b) is slightly misleading. HCC has previously made representations to identify that the Core Strategy should make provision for the expansion of Tring School, 'in the event that is required'. The statement that the capacity of Tring School will be increased is not correct.</p>	<p>Para 1.13 to be changed to state that ; Policies will be put in place that enable the expansion of Tring School. The capacity of Tring School could be increased through the provision of new detached playing fields which could be provided on HCC rural estate land nearby.</p> <p>At the time of writing, the use of Green Belt land to provide detached playing fields would be one of those categories of development defined as 'not inappropriate' in Planning Policy Guidance Note 2, Green Belts (PPG2), and therefore provision of detached playing fields is not considered to be a Core Strategy issue.</p>	Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is

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																considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
366491	Mr Brian Worrell					Paragraph	1.14	1.14	Objecting	Yes	No	b) Effective	As far as I can see, Markyate has little or no sport or active leisure facilities and yet more homes are planned. I have no idea if national guidelines in this area are being met as no-one I have spoken to seems to know what they are or point me in the right direction to find out. I am sure Markyate needs some facilities.			
611549	Ms J Bowyer	Three Rivers District Council				Paragraph	1.14	1.14	Supporting	Yes	Yes			Three Rivers District Council support the overall objectives for Kings Langley.		
223914	Mrs Nichola Mills					Paragraph	1.16	1.16	Supporting	Yes	Yes		Yes support this regarding green belt and local villages.		No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	1.16	1.16	Objecting	Yes	No	c) Consistent with national policy	A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.  Section 87 of the CRoW Act sets out the purposes of a conservation board as:  a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and  b) the purpose of increasing the understanding and enjoyment by	Add a reference to the need to also conserve and enhance the natural beauty of the Chilterns AONB as part of paragraph 1.16.	No, I do not wish to participate at the oral examination	

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													<p>the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which</p>			

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													<p>meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The approach to development in the AONB as described in sub-paragraph (d) of paragraph 1.17 (i.e. conserve and enhance the special qualities of the parts of the Borough within the Chilterns AONB which is supported in itself) should apply throughout the AONB. The AONB includes some of the settlements that are listed in paragraph 1.16, as well as others that are in very close proximity to the AONB, that are described as small villages within the Green Belt and rural area where some development could take place.</p>			
490893	Mrs christine kavanagh					Paragraph	1.17	1.17	Supporting	Yes	Yes		I fully support the intention to preserve open spaces and protect green belt land around Hemel Hempstead			
488516	mr hugh siegle					Paragraph	1.17	1.17	Supporting	Yes	Yes		I stongly support this policy. It is essential and is entirely in line with Governmant policy and the Borough's Vision for the Future		No, I do not wish to participate at the oral examination	
488516	mr hugh siegle					Paragraph	1.17	1.17	Supporting		Yes					
6106	Mr	Berkhamste				Paragraph	1.17	1.17	Supporting	Yes	Yes				No, I do not	

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62	Antony Harbidge	d Residents Action Group (BRAG)							ng	s	s				wish to participate at the oral examination	
488516	mr Hugh siegle					Paragraph	1.18	1.18	Supporting	Yes	Yes				No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	1.18	1.18	Supporting	Yes	Yes		BRAG fully supports this point.		No, I do not wish to participate at the oral examination	
488516	mr Hugh siegle					Paragraph	1.20	1.20	Objecting	Yes	No	b) Effective	The policy could be sound if there is more specific proposals. Two examples: the importance of social and community facilities and yet no reference to the importance of providing a 'cultural centre' for the Borough, and the need to protect historic buildings such as Ashlyns Hall a Grade 2* listed building and its rural setting as required by the 1990 Planning (Listed Buildings and Conservation Areas) Act.		No, I do not wish to participate at the oral examination	
214649	Mr John Greenaway	Jehovah's Witnesses				Paragraph	1.21	1.21	Supporting	Yes	Yes		I agree that allocation for community needs must be at the early planning stage and followed through. Please see my comments to paragraph 1.11	Please more empahis on D1-h and Basic D1 needs before all the land is used up and it cannot be provided !!!	Yes, I wish to participate at the oral examination	Plkease see comment on 1.11
488516	mr Hugh siegle					Paragraph	1.21	1.21	Objecting		No	b) Effective	I support the policy subject to the inclusion of water supplies with physical infrastructure and some evidence that S 106 and CIL levies will, a) be realistic and relevant to the infrastructure problem and actually used for that specific purpose		No, I do not wish to participate at the oral examination	
610662	Mr Antony	Berkhamsted Residents Action				Paragraph	1.21	1.21	Supporting	Yes	Yes		BRAG welcomes this statement and it is hoped that in future the Community Infrastructure levy and		No, I do not wish to participate	



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	Harbidge	Group (BRAG)											s.106 monies will indeed be paid, or designated buildings constructed: at national level it is acknowledged that in the past s.106 agreements did not deliver. BRAG is heartened by CS35. That the situation should be monitored is important, especially at a time of economic stringency, and it is important that the monitoring process has 'teeth'.		at the oral examination	
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	1.21	1.21	Supporting	Yes	Yes		<p>The fact that the PSCS places provision of physical infrastructure necessary to meet the demands arising out of new development is supported. The explicit acknowledgment of the need for additional schools and waste disposal facilities is supported.</p> <p>The clear requirement that development will be expected to make appropriate contributions towards infrastructure needs is endorsed. It should be noted that contributions may continue to be in the form of Section 106 contributions as well as the Community Infrastructure Levy Charge, particularly in respect of infrastructure which is only required in order to provide for the needs of a new area of residential development. [For example, provision of a new school to serve the development of the Local Allocation to the west of Hemel, (LA3)].</p> <p>Acknowledgment of the fact that contributions will sometimes need to be pooled to address the cumulative impact of development proposals is also supported. In this respect, the potential requirement for any tripartite development to the east of Hemel going into St Albans District, and the potential cumulative infrastructure requirements arising</p>		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC

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													should be noted.  Similarly, there is likely to be a relationship between development in Dacorum - Kings Langley and Three Rivers District. These impacts, and the potential way in which new infrastructure might be managed to ameliorate them, is likely to require the pooling of contributions between Districts which will need to be picked up via the Infrastructure Delivery Plan.			officers in proving the 'soundness' of the Core Strategy.
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	1.21	1.21	Supporting	Yes	Yes		We support the inclusion of the following text within paragraph 1.21:  "New development will be phased to ensure that there is either existing infrastructure capacity to accommodate increased demand or that additional infrastructure is provided. Careful consideration will be given to the provision of physical infrastructure (eg. roads, sewerage and waste disposal facilities) ..."  We note that this approach to the coordination of development with the delivery of infrastructure is consistent throughout the Core Strategy. It is essential to ensure that adequate utilities infrastructure, particularly water and sewerage infrastructure is in place ahead of development, to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems. We consider that the approach taken within the Core Strategy to the coordination of development with the delivery of infrastructure, will contribute to avoiding such adverse environmental impacts.	N/A	No, I do not wish to participate at the oral examination	
2114	Ms	Chipperfield				Paragraph	1.21	1.21	Supporting	Yes	Yes		We support the emphasis on		No, I do not	

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34	Joanne Deacon	Parish Council							ng	s	s		ensuring the existence of planning in suitable infrastructures when considering new development.		wish to participate at the oral examination	
4964 43		Grand Union Investments	3727 32	Ms Jane Barnett	Savills		Map 1	Map 1	Objectin g	Ye s	No	a) Justifie d	It is not sound because it is not Justified, Effective or Consistent with national policy.  The assumptions made in relation to Dacorum (DBC)'s suggested distribution of new development and the settlement hierarchy are critically flawed.  Hemel Hempstead Focus  DBC's settlement hierarchy is focussed on Hemel Hempstead being identified as a "Main Centre for Development and Change." This draws on the remnants of the East of England Regional Plan which was legally challenged in the High Court and as a result the substantial Green Belt extensions originally proposed around Hemel Hempstead were remitted to the Secretary of State to be treated as not approved or adopted. The principle reason being that the SEA procedure to justify this level of future development growth at Hemel Hempstead was found flawed. There is no extant regional policy, therefore, that considers future growth at Hemel Hempstead and notwithstanding this the sustainability credentials for large Green Belt extensions around the town were challenged. This is also a slightly historical debate as the Localism Bill has now been enacted at the time of writing and whilst the part of the Act requiring formal revoking of regional plans remains (as the Commencement Order is yet to be issued) it clearly shows the intent of the Government to abolish	The Key to Map 1, the Key Diagram should be changed:  Instead of "Main Centre for Development and Change" - should be: "Centre for Regeneration and Change".  Instead of "Areas of limited opportunities - market towns" - should be: "Areas of limited opportunities - Small Market Town".	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.

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													<p>regional plans as quickly as possible.</p> <p>Further, GUI's Housing Demand and Socio-Economic Assessment, November 2011 which considers the expected natural population (and household) growth at Hemel Hempstead concludes that limited or no Green Belt land release would be required. This, coupled with the fact that the sustainability credentials of substantial Green Belt land release around the town have also been challenged (as cited above), places questions around the extent of future development growth at Hemel Hempstead.</p> <p>However, it is also acknowledged that Hemel Hempstead is the largest town within the borough and should take some growth. It is for DBC to recommend on these aspects in terms of future development growth at Hemel Hempstead.</p> <p>GUI's position has and continues to be that strategic development growth at the second largest and important market town of the borough - Berkhamsted - offers the best solution in meeting the housing needs and demands of the town whilst representing strategic and complementary housing growth to Hemel Hempstead.</p> <p>The "Market Towns" and the Role of Berkhamsted</p> <p>Planning Policy Statement 1 (PPS 1) and Planning Policy Statement 3 (PPS3) encourage a sufficient quantity of housing to meet need and demand and to ensure improved choice. Both also encourage new housing</p>			

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													<p>development in suitable locations which offer a good range of community facilities with good access to jobs, key services and infrastructure. The Official Draft National Planning Policy Framework (NPPF) echoes the same issues, in particular the importance of</p> <p>housing demand being met at the right market locations whilst actively encouraging new development which brings forward new homes and delivers new and improved infrastructure.</p> <p>Turning to DBC's suggested settlement hierarchy as reflected within draft CS Policy CS1 concerning Distribution of Development, the following points are made.</p> <p>The definition of Hemel Hempstead as a "Main Centre for Development Change" has already been questioned, as per the above comments.</p> <p>In relation to the definition of "Market Towns", Tring should not be considered within the same category as Berkhamsted under the Council's draft settlement hierarchy, as identified in draft Table 1 (page 54) of the consultation document. It should be defined as a "Small Market Town" as reflected in GUI's suggested re-wording of Table 1 (below) supporting draft Policy CS1.</p> <p>Berkhamsted and Tring are not one and the same in terms of their categorisation. There are very distinctive differences in terms of the size of the existing population together with the level of local facilities, services and retail provision within each and their</p>			

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													<p>potential to expand in meeting local housing and development demands and needs.</p> <p>Berkhamsted has an estimated population of 23,747 (ONS 2008, published 2010) and is second largest (in household population) within Dacorum's draft settlement hierarchy following Hemel Hempstead. Tring on the other hand is a significantly smaller settlement in population size (15,974, ONS 2008, published 2010) and contains a limited number of facilities and retail provision when compared to Berkhamsted. They are both very different in character and function and how they contribute economically to the borough. In terms of market demand it is evident that the demand for new homes is much greater at Berkhamsted as a larger market town, which is well connected (by rail and road) and within commutable distance to London. Planned housing growth should always be directed to the right market locations.</p> <p>Historically, DBC as an Authority have recognised this. Adopted Policy 2 of Dacorum's Local Plan (adopted 2004) states that "development will generally be directed to the towns of Berkhamsted, Hemel Hempstead and Tring." The supporting text identifies that "Hemel Hempstead will take the largest share of development for housing and employment purposes. Opportunities for development at Berkhamsted (including the urban area of Northchurch Parish) are more limited. Tring is the smallest town and the most constrained. Very limited opportunities are likely in Tring." This acknowledges that Tring, as a smaller market town, has</p>			

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													<p>a very different current and future role from Berkhamsted as a larger market town (although the reference to Berkhamsted's more limited development opportunity is not agreed with, in principle, and dealt with below).</p> <p>In addition, the Emerging Core Strategy published in June 2009 acknowledges that Berkhamsted is the "second highest ranking settlement" within the Borough that "would normally accommodate a significant share of growth relative to Tring and the other large villages." The Pre-Submission CS identifies Berkhamsted as the "second largest settlement in the borough" at draft paragraph 21.1.</p> <p>Further, DBC's Emerging Core Strategy (June 2009) identified the overall vision of Berkhamsted in creating a "vibrant market town" as "an important town" to the borough. The CS Plan recognises that "no town can sustain itself unless there is investment and it can adapt and grow."</p> <p>The Authority themselves therefore appear confused on what the future role of Berkhamsted should be and have been inconsistent in their approach. This is most likely due to political pressures not to expand a market town where a local community would not support it but where such expansion is a real necessity now to meet future generation's needs in order to sustain the future status and function of Berkhamsted.</p> <p>GUI's Housing and Socio-Economic Assessment, November 2011, is conclusive that there is a critical need to expand Berkhamsted to</p>			

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													<p>meet future housing demands. Based on the latest population and household projections (ONS 2008), Berkhamsted has a future housing requirement of some additional 2,871 new homes (to 2031). This is significantly beyond the level DBC have planned for the town. The actual growth levels for the town also need to be acknowledged in the ranking of Berkhamsted within the settlement hierarchy.</p> <p>On the above basis, Draft Policy CS1 of the draft Pre-Submission Core Strategy needs to identify Berkhamsted as a Large market Town of an "Area of Strategic Development Opportunity".</p> <p>Future development growth should be directed where it can be sustained by existing and potentially new social and transportation infrastructure.</p> <p>Berkhamsted offers this opportunity and should be fully recognised in this respect alongside meeting local housing needs where there is a clear demand. Its role, character and function should therefore be enhanced. This approach would be consistent with the Pre-Submission Core Strategy in terms of achieving economic sustainability by investing for new homes (and businesses).</p> <p>Strengthening the role of Berkhamsted, as an important market town, would represent good planning in creating sustainable development which complements growth at Hemel Hempstead whilst also enhancing the unique aspects of the town itself. Its enhanced status would also identify opportunities for creating existing and new communities with a sense</p>			



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													<p>of place and identity. In addition, this approach would locate future growth where it could enhance opportunities for national and regional linkages particularly in terms of housing and economic growth within this important</p> <p>London Commuter Belt sub-region alongside future development growth identified at Hemel Hempstead. This approach also meets many of the strategic and local objectives of the Pre-Submission CS (which are explored in further detail within GUI's Planning Document which forms part of this evidence base).</p> <p>On the above basis, the objective to "maintain the vitality and viability of the settlement" is supported, however, Berkhamsted cannot be defined within the same category as Tring (as a much smaller market town) and the Large Villages within the borough in terms of accommodating future development growth.</p> <p>It is important that the large market town expands to meet its future housing needs and demands. GUI have created a solution for meeting this housing demand in identifying Land South of Berkhamsted as a Housing Allocation in the form of a sustainable and deliverable urban extension to the southern edge of the town. The Proposals are described in detail within GUI's Planning Document forming part of this evidence base and within GUI's response to policies and allocations contained within the Berkhamsted Chapter of the CS.</p> <p>Conclusions on soundness of draft Policy CS1: Distribution of</p>			

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													<p>Development</p> <p>Draft policy CS1 is not justified because the evidence on which the settlement hierarchy is based is not considered robust or credible. The current identification of Berkhamsted, Tring and Largestrategy when considered against the reasonable alternatives.</p> <p>Draft policy CS1 is not effective as it would not deliver the quantum or distribution of housing needed in the Borough to meet natural population and household growth.</p> <p>Draft policy CS1 is not consistent with national policy because it does not represent a basis for deciding where the planned location of new housing is distributed.</p> <p>It is strongly recommended, therefore, that CS policy recognises Berkhamsted as an important market town which could accommodate sustainable, strategic development growth complementary to the future role of Hemel Hempstead.</p> <p>Berkhamsted should not therefore be defined as an "Area of Limited Opportunity" but instead under the definition as an "Area of Strategic Development Opportunity." Draft CS1 should be amended as such to reflect this position to ensure it is sound and in accordance with PPS1, PPS3, PPS12 and the official Draft NPPF.</p> <p>On the above basis, it is also recommended that (1) Table 1 of the CS is amended (as recommended below); (2) Map 1, the Key Diagram is amended (as</p>			

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													recommended below).  It is also recommended that (1) "Dacorum 2031: A Vision" (paragraph 5.1; at page 33) of the Pre-Submission CS (2) the strategic objectives (at paragraph 6.2 of the CS) and (3) strategic objectives as set out at page 51 of the draft CS - are all amended to acknowledge that Berkhamsted is an important market town and an "Area of Strategic Development Opportunity" in accommodating new strategic development in the form of a sustainable, urban extension to the south of the town.			
494131	Mr Michael Emmett	CALA Homes					Map 1 - Key Diagram	Map 1	Objecting	Yes	No	a) Justified	It is unsound because it is not Justified or Effective.  This policy, and its supporting text, is considered to represent a somewhat half-hearted recognition that green belt boundary adjustments will be required. Paragraph 8.28 mentions that some small scale releases will be necessary, however it is contended that such releases are required now and that they should be explicitly proposed in the CS. It is therefore suggested that the locations already identified elsewhere in the CS (namely the local allocations in Table 9) are referred to in Policy CS5 as proposed green belt releases and key diagram is amended accordingly to illustrate the amended boundaries.	Amend green belt boundary to release all allocated sites. Reword Policy CS5 and amend key diagram accordingly.	Yes, I wish to participate at the oral examination	CALA Homes has a controlling interest in the Icknield Way Tring Local Allocation and as such has an important role to play in delivering a key element of the Core Strategy.
488516	mr hugh siegle					Paragraph	2.1	2.1	Objecting	No		c) Consistent with national policy	The Core Strategy has been prepared on the basis of existing planning policy and yet the Government has published a 'National Planning Policy Framework' which despite prompting many objections is the likely direction for planning. This approach sweeps away much of the		No, I do not wish to participate at the oral examination	

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													planning guidance that this Core Strategy relies on, so my comment is not so much an objection as a question as to whether on examination by a Planning Inspector or relevant Minister it will be seen as compliant with Government policy			
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	21.2	2.2	Objecting	No	No		Core Strategy is unsound because it is not justified, effective or consistent with national policy.  The provision for new housing is excessive and should be based on the lower option, consulted on in 2010, of 9,835 for the Borough, and in order to avoid the need for removal of land from the Green Belt. A 20% increase in homes is inconsistent with the statements on settlement hierarchy to enable population levels to remain stable. We do not consider that Berkhamsted can support the proposed scale of growth rate without compromising the historic and natural character of the town and its setting.	Total housing to be reduced, consistent with a total of 9,835 new dwellings for the borough, and removal of Local Allocation 4 from the text and figures.	Yes, I wish to participate at the oral examination	
629143	Mr Chris Briggs	St Albans City & District Council				Paragraph	Paragraph 2.3	2.3	Supporting	Yes	Yes		St Albans City & District Council is pleased to support the thrust of the Dacorum Core Strategy and support the joint working for the East Hemel Hempstead Area Action Plan (EHHAAP). This Council is also pleased that the October 27 Member and officer meeting confirmed the appropriateness of and support for joint working on the EHHAAP, as reflected in the Dacorum Core Strategy.		No, I do not wish to participate at the oral examination	
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Boyer Planning	Borough Portrait	Section 3	3	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Consistent with national policy.  Whilst the Vision is generally supported it is submitted that its	Para 5.1 : Para 3 of the Vision should be amended to read:  <b>"Hemel Hempstead has been transformed through regeneration of the town centre</b>	Yes, I wish to participate at the oral examination	Significant issue relating to housing provision, spatial strategy, Hemel Hempstead Place Strategy.

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													approach to housing provision at Hemel Hempstead is too restrictive-see Section Three of Statement.	<b><i>ad Maylands Business Park. The town centre is fulfilling its potential as sub-regional business centre, important for green enterprise, and is meeting the demand for new homes to ensure sustainable growth of the town as an important sub-regional business centre"</i></b> ( amended text show by underlining)		
488516	mr hugh siegle					Paragraph	3.2	3.2	Supporting	Yes	Yes		I support this strategic approach		No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	3.2	3.2	Supporting	Yes	Yes		Not only do the majority of Dacorum residents live in Hemel Hempstead, DBC actively advertises the town as an attractive place for people and businesses to relocate to (see "Dacorum Borough and the case for relocation - Hemel Hempstead more than a magic roundabout...."), so it is logical that the growth in Dacorum will be centred in Hemel Hempstead.		No, I do not wish to participate at the oral examination	
488516	mr hugh siegle					Paragraph	3.3	3.3	Supporting		Yes		I support this strategic approach to the towns and settlements of the Borough, coupled with 3.2 it provides an accurate portrait and should not be subject to variation or amendment		No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	3.5	3.5	Supporting	Yes	Yes		Protection of Green Belt is of the utmost importance.		No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	3.5	3.5	Objecting	Yes	No	c) Consistent with national policy	A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way	Add a reference to the existence and extent of the nationally protected Chilterns AONB as part of the portrait of the Borough.	No, I do not wish to participate at the oral examination	

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													<p>(CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the</p>			

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												<p>area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The Board considers that as part of the portrait of the Borough this paragraph should recognise that much of the Borough falls within the Chilterns AONB (it is acknowledged that this is reflected elsewhere but it would be appropriate to highlight this important part of the Borough's assets).</p>				
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	3.12	3.12	Objecting	Yes	No	a) Justified	BRAG believes that the statement "the proportion of residents working elsewhere is currently the lowest in the county, making Dacorum more 'self-contained' than the rest of Hertfordshire" is misleading in terms of Berkhamsted. A far greater proportion of people commute out of the area from Berkhamsted than they do from Hemel Hempstead which puts an excessive strain on transport links and parking in	This paragraph should be split into towns, which would show that Hemel Hempstead may be more 'self-contained' but Berkhamsted has a much greater proportion of commuters.	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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													Berkhamsted and that needs to be considered when looking at section 21 Berkhamsted Place Strategy. Given that Berkhamsted does not offer much choice in employment, many more people commute. However, those in rush hour trains are crammed in, and there is no sign of the situation improving, while parked cars of commuters line the relatively narrow streets.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	3.15	3.15	Supporting	Yes	Yes		BRAG agrees with DBC's 'age structure' and accepts that challenges DBC faces, while pointing out that ridge-top developments have to be avoided to fulfil the aim of "ensuring easy access to essential services and facilities."		No, I do not wish to participate at the oral examination	
488516	mr hugh siegle					Paragraph	3.21	3.21	Supporting	Yes			I support this description of the landscape and the importance of protecting it and existing Green Belt boundaries		No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	3.21	3.21	Supporting	Yes	Yes		BRAG endorses DBC's description of the borough and confirms that the residents of Berkhamsted greatly value the countryside and Green Belt surrounding the town. BRAG would add that the Green Belt and AONB that borders the town is either productive farmland, which is important for national food security, or woodland, contrary to one developer's allegation that land SE of Berkhamsted is "quasi-brownfield". There is also the pleasure of looking at historic buildings in a rural setting, such as the Grade 2* Ashlyns Hall. For the avoidance of doubt, not only a listed building but also its setting is protected under s.72 of 1990 Planning (Listed Buildings and Conservation Areas) Act. "Framing" such a building by a housing estate would be gross.		No, I do not wish to participate at the oral examination	



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211503	Mr Colin White	Chilterns Conservation Board				Paragraph	3.21	3.21	Supporting	Yes	Yes		<p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to</p>		No, I do not wish to participate at the oral examination	

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												<p>affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The Board welcomes and supports the recognition given in these paragraphs to the importance of the Chilterns AONB and the Chilterns Chalk Streams as important elements of the environment of the Borough.</p>				
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 3.21	3.21	Supporting	Yes	Yes		Page 24 Para 3.21 Support		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations

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																are discussed.
610088	Mr Martin Hicks	HBRC				Paragraph	3.22	3.22	Objecting	No	a) Justified	White-clawed crayfish are now considered extinct in Hertfordshire. This paragraph should also mention the Special Area of Conservation (Chiltern Beechwoods), state the number of SSSIs in the District (eight) and also mention the Wildlife Site resource - consistent with the references to the historic environment.	'....Vale. The district has parts of the Chilterns Beechwoods Special Area of Conservation, eight Sites of Special Scientific Interest and over 200 Wildlife Sites'.  Remove reference to crayfish.	No, I do not wish to participate at the oral examination		
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	3.22	3.22	Supporting	Yes	Yes	See BRAG comment for 3.21 and it is worth adding that the abundance of wildlife in the Green Belt areas, which include badgers, kites, wild rabbits etc, give pleasure and offer quality of life to residents regardless of how common or not a species may be.		No, I do not wish to participate at the oral examination		
211072	Ms Katherine Fletcher	English Heritage				Paragraph	3.22	3.22	Objecting	Yes	No	Berkhamsted Castle is a major landmark and a highly significant asset in the context of the district's heritage. It would be appropriate to mention it here along with the reference to the Grand Union canal.				
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	3.22	3.22	Supporting	Yes	Yes	A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.  Section 87 of the CRoW Act sets out the purposes of a conservation board as:  a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and  b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural		No, I do not wish to participate at the oral examination		

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												<p>beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that</p>				

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													meeting will be duly forwarded.  Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.  The Board welcomes and supports the recognition given in these paragraphs to the importance of the Chilterns AONB and the Chilterns Chalk Streams as important elements of the environment of the Borough.			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	4.2	4.2	Objecting	Yes	No	b) Effective	It is unsound because it is not Justified, Effective, Consistent with national policy.  The omission of an explicit commitment to provide improved and additional social infrastructure, in support of balanced and sustainable growth, calls into question the effectiveness of the Core Strategy in delivering this Core Challenge.  PPS1 paragraph 16 and draft NPPF policies support the need for clear social policies to plan effectively for people and their diverse needs.  The Core Strategy is supported by 'Social and Community Facilities - Background Study' (January 2006). This is a wide ranging study but embraces many community facilities including places of worship and examines the elements of sustainable communities in the light of national and regional planning policy. This indicates the need for promoting socially inclusive	Insert "together with improved and new social infrastructure", after "accomodated" in the second paragraph in the box.	Yes, I wish to participate at the oral examination	

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													communities (PPS paragraph 16). This is omitted from the Core Challenge 1 - Balanced and Sustainable Growth.			
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	4.2	4.2	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy.  The environmental and infrastructure constraints resulting from the already congested character of the Borough mean that further damage can only be avoided by limiting new development to that required to meet the needs specifically identified in the Challenges.	Challenge 1 should be amended by deleting the sentence starting with "A view will need..." and adding "to meet the needs arising from within the Borough and others only as specifically identified in the Challenges set out in this Section" to the preceding sentence.	No, I do not wish to participate at the oral examination	
623313	Mr John Clark	CBRE Global Investors	623314	Mr Jon Stoddart	CBRE Ltd	Paragraph	4.2	4.2	Supporting	Yes	Yes		CBRE supports the Council's statement that 'The right type of housing should be provided in the right locations, taking into account changes in the population structure'. However, this statement is rather vague and we would suggest that it is more prescriptive and provides an example.			
488516	mr hugh siegle					Paragraph	4.5	4.5	Objecting		No	b) Effective	No mention of the importance of culture, other than comment in 4.6 that current provision is low. A major strategic plan for the centre of Hemel Hempstead is required if it is to be regenerated and able to compete with other major towns in the region		No, I do not wish to participate at the oral examination	
620322		West Herts College	620319	Ms Alison Tero	CBRE	Paragraph	4.5	4.5	Supporting	Yes	No		The Core Strategy is unsound because it is not justified, effective and does not consistent with national policy.  WHC supports the regeneration of Hemel Hempstead town centre and recognises the opportunity for further improvements to the town centre through the delivery of	We suggest the third sentence in paragraph 4.5 is strengthened to include reference to the opportunity to introduce additional development through the redevelopment of under-utilised sites within the town centre for a range of town centre uses.	Yes, I wish to participate at the oral examination	West Herts College (WHC) would like to participate at the oral part of the Examination if its proposed recommendations (as set out in these representations)

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													additional homes, offices, retail and other town centre uses, and through the redevelopment of under-utilised sites such as the WHC campus. Improvements to the retail offer and quality of the overall environment will enable Hemel Hempstead to compete with larger sub-regional centres such as Milton Keynes and Watford.			are not included in the Submission version of the Core Strategy.  WHC would like the opportunity to set out its reasoning for the recommendations made in its representations to ensure that the policies and vision set out in Core Strategy are considered 'sound' and that they support WHC's proposals for its Dacorum Campus.
366491	Mr Brian Worrell					Paragraph	4.6	4.6	Objecting	No	No	c) Consistent with national policy	This paragraph states that the 'social, leisure and cultural facilities are currently quite low for the size of population'. What and how is this measured? Why is there no attempt to specify what the gap is and what needs to be done to meet the requirement? And if there is a target range, we should aim for the top level of provision and be proud of the aspiration to be better than others.			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	4.6	4.6	Supporting	Yes	Yes		The Trust welcomes and supports the identification of Challenge 4 - Strong, inclusive communities and particularly the objective of reducing inequalities whether based on race, gender, religion or income. The Trust also welcomes the acknowledgement that the range of social, leisure and cultural facilities are low for the size of the population.			
610088	Mr Martin	HBRC				Paragraph	4.7	4.7	Objecting	No	No	b) Effective	This fails to reflect the wider 'natural environment' sufficiently. The character and nature of the	Add: '...careful land management that is supportive of traditional farming, forestry and local food	No, I do not wish to participate	

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	Hicks												environment - including countryside and urban greenspace - is a direct result of its management and the impacts of development and human pressure as a result. The degradation of this resource is happening already irrespective of climate change and population growth - these simply further exacerbate the problem. Key to maintaining a robust countryside is its traditional management, where possible, and this is achieved by farming or forestry, issues that already have been somewhat marginalised as being of relatively little significance generally to the borough. This view must be countered if the quality of this resource is to be maintained and enhanced. Outside of special areas where management can be independently supported (some nature reserves etc) this will involve supporting traditional land management for food. 'Careful' land management does nothing to explain the threat - or the solution. Otherwise the greenspaces will become nothing other than a mixture of theme park, intensive sterile agriculture, leisure or redundant land for development. This result is a failure of Sustainable Development.	production'.	at the oral examination	
488516	mr hugh siegle					Paragraph	4.7	4.7	Objecting	No	b) Effective		The main natural resource, the water supply is not referred to. Without proper steps to augment and safeguard the supply for present and future generations the growth envisaged will not be achievable		No, I do not wish to participate at the oral examination	
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	4.7 Challenge 5	4.7	Supporting	Yes	Yes		Waste management has been considered throughout the document with Challenge 5 accounting for the effective disposal of waste and Strategic Objective 13 promoting the use of renewable resources, protecting natural			



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													resources and reducing waste.			
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	4.8	4.8	Supporting	Yes	Yes					
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	4.8	4.8	Objecting	Yes	No	b) Effective	Despite these positive observations and general solid direction of the Core Strategy, some inconsistency comes through between and within certain sections, and between Policies and the supporting text. We are concerned about an apparently dominant focus on carbon emissions and climate change mitigation in some sections, which creates inconsistency and some confusion within the Strategy.  Paragraph 4.8, Challenge 6, makes reference to the <i>mitigation</i> of climate change impacts through sustainable design and construction. It would be better here to say "mitigate against and adapt to the impacts of climate change". Moreover, it would be preferable to see here a reference to the other benefits of sustainable design and construction, mentioned in paragraphs 18.19 and 18.22, for instance.	Ensure consistency when discussing sustainability and sustainable development in the Core Strategy, Policies and supporting documents and guidance to ensure no perverse outcomes on other sustainability objectives.  Paragraph 4.8, Challenge 6, makes reference to the <i>mitigation</i> of climate change impacts through sustainable design and construction. It would be better here to say "mitigate against and adapt to the impacts of climate change". Moreover, it would be preferable to see here a reference to the other benefits of sustainable design and construction, mentioned in paragraphs 18.19 and 18.22, for instance.	No, I do not wish to participate at the oral examination	
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Borough Vision	Section 5	5	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective or consistent with national policy.  The key role of Hemel Hempstead in the provision of new homes should be incorporated in the Vision to comply with current regional policy.  The aspiration of Hemel Hempstead to be transformed through regeneration of the Town Centre	Page 33 - Vision: Para 3 of the Vision should be amended to read:  "Hemel Hempstead has been transformed through regeneration of the town centre and Maylands Business Park. The town is fulfilling its potential as a sub-regional business centre, important for green enterprise, and will meet the need and demand for new homes to ensure	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms of housing provision which is fundamental to

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													<p>and Maylands Business Park in paragraphs 1.10 to 1.12 of the summary Strategy is to be welcomed as well as the vision to fulfil the potential to be a sub regional business centre. However it is considered that economic growth required to meet this part of the vision will be stifled by restricting the supply of housing and also the need and demand for housing in and around Hemel Hempstead does not have sufficient emphasis. The Pre Submission Core Strategy seeks to meet only „local housing needs’ in paragraph 1.5. This restriction on housing supply which meets local population needs only, fails to recognise the wider sub regional nature and role of the Borough and the position of Dacorum within the wider region in terms of commuting, particularly the strong links to the London commuter markets and the pre eminence of Hemel Hempstead within the Borough itself. The Dacorum 2031 Vision on page 33 needs to emphasise the role of Hemel Hempstead in providing new housing.</p> <p>The Pre Submission Core Strategy assumes nil net migration which is unrealistic. The recently adopted London Plan assumes continued outward net migration from London, which will increase over the years in line with overall population increases. This is further shown in the London Commuter Belt (West) sub-region - Strategic Housing Market Assessment 2008 which identifies between 10% and 30% of the resident population working in the London region. With increased out commuting of the workforce this will increase. But the current Pre Submission policies in the Strategy will tend to suppress economic growth by limiting the supply of</p>	<p>the sustainable growth of the town as an acknowledged and important sub-regional business centre ."</p> <p>Page 38 - Strategic Objectives: Objective 10 should be amended from "To provide a mix of new homes to meet the needs of the population" (which is acceptable) and have added "to provide sufficient housing to meet the future needs of the Borough," (to acknowledge and meet the shortfall in housing provision).</p>		<p>the Plan as a whole. The important role of Hemel Hempstead in providing housing should be emphasised and needs to be examined orally given its importance to the Core Strategy overall.</p>

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													<p>housing. This will discourage inward migration and in turn inhibit economic growth leading to failure in achieving the overall Vision.</p> <p>The lack of housing growth will increase housing pressures, manifesting itself in rising house prices and costs (mortgages and rents) and will be detrimental to the overall economic well being of the Borough. This will then inhibit economic growth by discouraging employers from moving to the area if local housing costs are too high. This will not support the much needed economic recovery.</p> <p>The Strategic Objectives for the Borough are summarised on page 10 of the Pre-Submission document. Several objectives are identified and, whilst this is stated not to be a complete list, two of these represent the Council's main priorities - i.e.:</p> <p style="padding-left: 40px;">Strengthening Economic Property Providing Homes and Community Services</p> <p>These are supported by our Clients. However we are concerned that the policy framework as currently set out will not provide a robust basis for fulfilling these Objectives. The principal reason is due to the Council's proposed housing target of 10,750 (2006-2031), i.e. 430 dwelling per annum (dpa) which is too low. This issue is addressed in further detail below.</p> <p>The Strategy must be expanded to seek an increased housing supply to</p>			

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													<p>meet the demands generated by the economic growth sought by the Borough as an important sub regional business centre.</p> <p>The Pre Submission Core Strategy in the „Location and Management of Development“ in paragraphs 8.13 to 8.16 and in Policies CS2 and CS3 acknowledges that to meet demand for housing will require the limited release of green field/Green Belt sites later in the Plan period. Whilst some limited sites have been assessed and incorporated in the Core Strategy, these are insufficient to provide for the increased numbers required to meet anticipated demand, make up for the shortfall which is likely and, in turn, would unnecessarily constrain growth.</p> <p>Many of the more detailed Strategic Objectives are supported. Objective 10 on page 38 which seeks to provide a mix of new homes to meet the needs of the population should be expanded to make reference to meeting the housing needs of the Borough as a sub regional centre. Opportunities to provide a mix of new homes, affordable homes etc are more easily accommodated on well located sustainable urban extension sites such as that at Nash Mills, the subject of these representations.</p>			
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	Borough Vision	Borough Vision	5	Supporting	Yes	Yes		USS continues to support the Dacorum Borough Vision for 2031 which seeks to transform Hemel Hempstead through the regeneration of the town centre and Maylands Business Park.			
607346	DEF Dacorum	Dacorum Environmental Forum Waste				Paragraph	5.1	5.1	Objecting	No	b) Effective		This is not sufficiently <b>effective</b> , since there is no mention of the Global context.	The Borough vision should be set in the context of Global issues, including Dacorum residents' contribution to global warming by		

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	Environmental Forum	Group											<p>The aspiration is laudable, but it is unrealistic not to include any reference to Global issues. For example, Dacorum residents contribute to global warming by their purchases of goods manufactured in China (see our response to 11.11 on low carbon technology) .</p> <p>It is disappointing that there appears to be no reference to the Global context in the Core Strategy. This is in contrast to the public consultation document of November 2010, which contained:</p> <p>"9.1 The Sustainable Development Strategy sets out the over-arching approach towards development within Dacorum.</p> <p>9.2 Contributing to the achievement of sustainable development is a statutory objective of the planning system<sup>1</sup>. The UK's Sustainable Development Strategy – Securing the Future (2005) has defined the goal of sustainable development as being:</p> <p><i>"to enable all people through the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations."</i></p> <p>A key component of global Sustainable Development is world population growth, which exacerbates the problems of</p>	<p>their purchases of goods manufactured abroad.</p> <p>The vision should include an aspiration for a stabilised world population that is sustainable by the planet upon whose resources it depends.</p> <p>In line with our suggested addition to Strategic Objectives (6.2), the following sentence should be inserted into the Vision:</p> <p>"Most of our food is grown in and around Dacorum".</p>		

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													<p>scarcity of land and other resources and is on such a scale that UK migration policy, while being a key determinant in UK planning (see our response to 14.7), has a negligible global effect. Our Borough's vision should include its aspiration for a stabilised world population that is sustainable by the planet upon whose resources it depends.</p> <p>In line with our suggested addition to Strategic Objectives (6.2), the following sentence should be inserted into the Vision:</p> <p>"Most of our food is grown in and around Dacorum".</p>			
488516	mr hugh siegle					Paragraph	5.1	5.1	Objecting	No	b) Effective		It is difficult not to sign up to a Vision which promises Utopia but the detail of the Core Strategy does not take us there. How is this to be achieved? Planned growth will adversely impact the environment and natural resources. The regeneration of Hemel Hempstead centre will require significant investment by third parties. Culture does not feature. Despite earlier reference (1.11), to a 'General Hospital' the Vision refers to 'improving access to the Watford Health campus'. How exactly? The Borough is not responsible for the road network, nor is it responsible for the Watford health facilities themselves.	More robust and specific proposals are required	No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	5.1	5.1	Supporting	Yes	Yes		BRAG supports the vision and welcomes that Berkhamsted is treated with Tring and emphasises that Berkhamsted should not be used as an overflow or feeder town for Hemel Hemstead. Berkhamsted has its own distinct character and		No, I do not wish to participate at the oral examination	

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													we welcome that DBC recognise and values this. Removing Berkhamsted from the same classification as Tring, as suggested by at least one developer, must continue to be rejected out of hand.			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	5.1	5.1	Objecting	Yes	No	b) Effective	Whilst the Trust broadly welcomes the Vision for Dacorum 2031, the omission of social and community infrastructure alongside new homes in Hemel Hempstead calls into question the effectiveness of the Core Strategy and its internal coherence in the light of the challenge 4 identified at paragraph 4.6 and the functions of Berkhamsted, Tring and the large villages in providing community services.	Add "together with a range of new and improved social infrastructure", after "new homes" in paragraph 3 in the box.	Yes, I wish to participate at the oral examination	
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	5.1	5.1	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>The assumptions made in relation to Dacorum (DBC)'s suggested distribution of new development and the settlement hierarchy are critically flawed.</p> <p><u>Hemel Hempstead Focus</u></p> <p>DBC's settlement hierarchy is focussed on Hemel Hempstead being identified as a "Main Centre for Development and Change." This draws on the remnants of the East of England Regional Plan which was legally challenged in the High Court and as a result the substantial Green Belt extensions originally proposed around Hemel Hempstead were remitted to the Secretary of State to be treated as not approved or adopted. The principle reason being that the SEA procedure to justify this level of future development growth at Hemel Hempstead was found flawed.</p>		Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.

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													<p>There is no extant regional policy, therefore, that considers future growth at Hemel Hempstead and notwithstanding this the sustainability credentials for large Green Belt extensions around the town were challenged. This is also a slightly historical debate as the Localism Bill has now been enacted at the time of writing and whilst the part of the Act requiring formal revoking of regional plans remains (as the Commencement Order is yet to be issued) it clearly shows the intent of the Government to abolish regional plans as quickly as possible.</p> <p>Further, GUI's Housing Demand and Socio-Economic Assessment, November 2011 which considers the expected natural population (and household) growth at Hemel Hempstead concludes that limited or no Green Belt land release would be required. This, coupled with the fact that the sustainability credentials of substantial Green Belt land release around the town have also been challenged (as cited above), places questions around the extent of future development growth at Hemel Hempstead.</p> <p>However, it is also acknowledged that Hemel Hempstead is the largest town within the borough and should take some growth. It is for DBC to recommend on these aspects in terms of future development growth at Hemel Hempstead.</p> <p>GUI's position has and continues to be that strategic development growth at the second largest and important market town of the borough - Berkhamsted - offers the best solution in meeting the housing</p>			



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													<p>needs and demands of the town whilst representing strategic and complementary housing growth to Hemel Hempstead.</p> <p><u>The "Market Towns" and the Role of Berkhamsted</u></p> <p>Planning Policy Statement 1 (PPS 1) and Planning Policy Statement 3 (PPS3) encourage a sufficient quantity of housing to meet need and demand and to ensure improved choice. Both also encourage new housing development in suitable locations which offer a good range of community facilities with good access to jobs, key services and infrastructure. The Official Draft National Planning Policy Framework (NPPF) echoes the same issues, in particular the importance of</p> <p>housing demand being met at the right market locations whilst actively encouraging new development which brings forward new homes and delivers new and improved infrastructure.</p> <p>Turning to DBC's suggested settlement hierarchy as reflected within draft CS Policy CS1 concerning Distribution of Development, the following points are made.</p> <p>The definition of Hemel Hempstead as a "Main Centre for Development Change" has already been questioned, as per the above comments.</p> <p>In relation to the definition of "Market Towns", Tring should not be considered within the same category as Berkhamsted under the Council's draft settlement hierarchy,</p>			

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													<p>as identified in draft Table 1 (page 54) of the consultation document. It should be defined as a "Small Market Town" as reflected in GUI's suggested re-wording of Table 1 (below) supporting draft Policy CS1.</p> <p>Berkhamsted and Tring are not one and the same in terms of their categorisation. There are very distinctive differences in terms of the size of the existing population together with the level of local facilities, services and retail provision within each and their potential to expand in meeting local housing and development demands and needs.</p> <p>Berkhamsted has an estimated population of 23,747 (ONS 2008, published 2010) and is second largest (in household population) within Dacorum's draft settlement hierarchy following Hemel Hempstead. Tring on the other hand is a significantly smaller settlement in population size (15,974, ONS 2008, published 2010) and contains a limited number of facilities and retail provision when compared to Berkhamsted. They are both very different in character and function and how they contribute economically to the borough. In terms of market demand it is evident that the demand for new homes is much greater at Berkhamsted as a larger market town, which is well connected (by rail and road) and within commutable distance to London. Planned housing growth should always be directed to the right market locations.</p> <p>Historically, DBC as an Authority have recognised this. Adopted Policy 2 of Dacorum's Local Plan (adopted 2004) states that</p>			

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													<p>"development will generally be directed to the towns of Berkhamsted, Hemel Hempstead and Tring." The supporting text identifies that "Hemel Hempstead will take the largest share of development for housing and employment purposes. Opportunities for development at Berkhamsted (including the urban area of Northchurch Parish) are more limited. Tring is the smallest town and the most constrained. Very limited opportunities are likely in Tring." This acknowledges that Tring, as a smaller market town, has a very different current and future role from Berkhamsted as a larger market town (although the reference to Berkhamsted's more limited development opportunity is not agreed with, in principle, and dealt with below).</p> <p>In addition, the Emerging Core Strategy published in June 2009 acknowledges that Berkhamsted is the "second highest ranking settlement" within the Borough that "would normally accommodate a significant share of growth relative to Tring and the other large villages." The Pre-Submission CS identifies Berkhamsted as the "second largest settlement in the borough" at draft paragraph 21.1.</p> <p>Further, DBC's Emerging Core Strategy (June 2009) identified the overall vision of Berkhamsted in creating a "vibrant market town" as "an important town" to the borough. The CS Plan recognises that "no town can sustain itself unless there is investment and it can adapt and grow."</p> <p>The Authority themselves therefore appear confused on what the future</p>			

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													<p>role of Berkhamsted should be and have been inconsistent in their approach. This is most likely due to political pressures not to expand a market town where a local community would not support it but where such expansion is a real necessity now to meet future generation's needs in order to sustain the future status and function of Berkhamsted.</p> <p>GUI's Housing and Socio-Economic Assessment, November 2011, is conclusive that there is a critical need to expand Berkhamsted to meet future housing demands. Based on the latest population and household projections (ONS 2008), Berkhamsted has a future housing requirement of some additional 2,871 new homes (to 2031). This is significantly beyond the level DBC have planned for the town. The actual growth levels for the town also need to be acknowledged in the ranking of Berkhamsted within the settlement hierarchy.</p> <p>On the above basis, Draft Policy CS1 of the draft Pre-Submission Core Strategy needs to identify Berkhamsted as a Large market Town of an "Area of Strategic Development Opportunity".</p> <p>Future development growth should be directed where it can be sustained by existing and potentially new social and transportation infrastructure.</p> <p>Berkhamsted offers this opportunity and should be fully recognised in this respect alongside meeting local housing needs where there is a clear demand. Its role, character and function should therefore be enhanced. This approach would be</p>			

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													<p>consistent with the Pre-Submission Core Strategy in terms of achieving economic sustainability by investing for new homes (and businesses).</p> <p>Strengthening the role of Berkhamsted, as an important market town, would represent good planning in creating sustainable development which complements growth at Hemel Hempstead whilst also enhancing the unique aspects of the town itself. Its enhanced status would also identify opportunities for creating existing and new communities with a sense of place and identity. In addition, this approach would locate future growth where it could enhance opportunities for national and regional linkages particularly in terms of housing and economic growth within this important</p> <p>London Commuter Belt sub-region alongside future development growth identified at Hemel Hempstead. This approach also meets many of the strategic and local objectives of the Pre-Submission CS (which are explored in further detail within GUI's Planning Document which forms part of this evidence base).</p> <p>On the above basis, the objective to "maintain the vitality and viability of the settlement" is supported, however, Berkhamsted cannot be defined within the same category as Tring (as a much smaller market town) and the Large Villages within the borough in terms of accommodating future development growth.</p> <p>It is important that the large market town expands to meet its future housing needs and demands. GUI</p>			

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													<p>have created a solution for meeting this housing demand in identifying Land South of Berkhamsted as a Housing Allocation in the form of a sustainable and deliverable urban extension to the southern edge of the town. The Proposals are described in detail within GUI's Planning Document forming part of this evidence base and within GUI's response to policies and allocations contained within the Berkhamsted Chapter of the CS.</p> <p><u>Conclusions on soundness of draft Policy CS1: Distribution of Development</u></p> <p>Draft policy CS1 is not justified because the evidence on which the settlement hierarchy is based is not considered robust or credible. The current identification of Berkhamsted, Tring and Large strategy when considered against the reasonable alternatives.</p> <p>Draft policy CS1 is not effective as it would not deliver the quantum or distribution of housing needed in the Borough to meet natural population and household growth.</p> <p>Draft policy CS1 is not consistent with national policy because it does not represent a basis for deciding where the planned location of new housing is distributed.</p> <p>It is strongly recommended, therefore, that CS policy recognises Berkhamsted as an important market town which could accommodate sustainable, strategic development growth complementary to the future role of Hemel Hempstead.</p> <p>Berkhamsted should not therefore</p>			

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													<p>be defined as an "Area of Limited Opportunity" but instead under the definition as an "Area of Strategic Development Opportunity." Draft CS1 should be amended as such to reflect this position to ensure it is sound and in accordance with PPS1, PPS3, PPS12 and the official Draft NPPF.</p> <p>On the above basis, it is also recommended that (1) Table 1 of the CS is amended (as recommended below); (2) Map 1, the Key Diagram is amended (as recommended below).</p> <p>It is also recommended that (1) "Dacorum 2031: A Vision" (paragraph 5.1; at page 33) of the Pre-Submission CS (2) the strategic objectives (at paragraph 6.2 of the CS) and (3) strategic objectives as set out at page 51 of the draft CS - are all amended to acknowledge that Berkhamsted is an important market town and an "Area of Strategic Development Opportunity" in accommodating new strategic development in the form of a sustainable, urban extension to the south of the town.</p>			
620322		West Herts College	620319	Ms Alison Tero	CBRE	Paragraph	5.2	5.2	Supporting	Yes	No				Yes, I wish to participate at the oral examination	West Herts College (WHC) would like to participate at the oral part of the Examination if its proposed recommendations (as set out in these representations) are not included in the Submission version of the

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																Core Strategy.  WHC would like the opportunity to set out its reasoning for the recommendations made in its representations to ensure that the policies and vision set out in Core Strategy are considered 'sound' and that they support WHC's proposals for its Dacorum Campus.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Strategic Objective	Strategic Objectives	6	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective or Consistent with national policy.  Page 38 - Strategic Objectives: Objective 10 does not provide for sufficient housing to meet the future needs of the Borough as required by PPS 3, PPS 12 and current regional guidance.	Page 38 - Strategic Objectives: Objective 10 should be amended from "To provide a mix of new homes to meet the needs of the population" (which is acceptable) and have added "to provide sufficient housing to meet the future needs of the Borough," (to acknowledge and meet the shortfall in housing provision).	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms of housing provision which is fundamental to the Plan and to our representations as a whole. The details of housing provision overall and also the merits of the site and the relative merits of other boundary changes or allocated sites will need to be examined orally.
5028	Mr	Hertfordshir				Strategic	Strategic	6	Supporting	Yes	Yes		Waste management has been			



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74	Chris Bearton	e County Council				Objective	Objective 13		ng	s	s		considered throughout the document with Challenge 5 accounting for the effective disposal of waste and Strategic Objective 13 promoting the use of renewable resources, protecting natural resources and reducing waste.			
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Strategic Objective	Strategic Objectives	6	Supporting	Yes	Yes		The identification of the Core Strategy Strategic Objectives is supported. In particular the inclusion of the following strategic objectives is strongly supported:  14. To protect people and property from flooding.  16. To co-ordinate the delivery of new infrastructure with development.	N/A	No, I do not wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Strategic Objective	Strategic Objectives	6	Supporting	Yes	Yes		P37 Para 6.2 Strategic Objectives Support  Item 17 Berkhamsted infrastructure is not fit for purpose. Early work is warranted to ensure already stressed infrastructure has capacity to accommodate further expansion of the settlement.		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Paragraph	6.2 (Strategic Objective)	6.2	Objecting	No	b) Effective		This is not sufficiently <b>effective</b> , since two objectives are self-contradictory unless the strategy addresses the conflicting interests of developer/home improver and neighbouring residents.  We support the emphasis on access rather than transport, and the reduction in need to travel by car (Objective 4.) This implies a general presumption in favour of commonly needed facilities being provided locally, with good pedestrian access.	The word "vibrant" should be replaced by "sustainable" here and anywhere else it is used in the Strategy.  The Strategy should encompass mechanisms for minimising detriments to quality of life, that commonly occur in neighborhoods, as listed above.  The list should include an Objective concerning local food. We suggest:  "To support and encourage food		

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													<p>The unqualified aim of a -vibrant and prosperous economyll (Point 9) should be subject to ensuring the -high quality of lifell of Point 1. The many black-economy home-based businesses and extended DIY activities of one section of the community are already detrimental to the quality of life for others in the neighbourhoods in which they occur.</p> <p>Examples of this are:</p> <p>Protracted house extension activity not involving the official use of contractors and therefore not currently subject to limits on working hours.</p> <p>Use of pavements and verges for building waste and materials for extended periods of time, whether or not stored in skips.</p> <p>Widespread use of stone cutters with no dust suppressant.</p> <p>Aggravation of street and pavement parking nuisance through the use of commercial vehicles for journey to work and home-based businesses</p> <p>The Strategy should encompass mechanisms for minimising these detriments to quality of life, which to too many residents are very real and of the utmost priority.</p>	to be grown, processed and sold locally, to meet most of the needs of the residents of Dacorum".		

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													<p>In particular, the word "vibrant", with its echoes of uncontrolled growth, with attendant noise and light pollution, should be replaced by "sustainable" here and anywhere else it is used in the Strategy.</p> <p>The list should include an Objective concerning local food. We suggest:</p> <p>"To support and encourage food to be grown, processed and sold locally, to meet most of the needs of the residents of Dacorum".</p> <p>Although there is some mention of local food production under Section 26, Countryside Place Strategy, it is sufficiently important to be ranked here as a Strategic Objective.</p>			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	6.2	6.2	Supporting	Yes	Yes		BRAG supports the Strategic Objectives and would like to emphasise points 5, 6, 7 and 12.		No, I do not wish to participate at the oral examination	
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Paragraph	Strategic Objective 9 (and section 11 Strategic Objectives also)	6.2	Objecting	Yes	No	a) Justified	<p>We object to this particular wording:</p> <p>to maintain commercial enterprise and employment opportunities in the market towns and large villages;</p> <p>TTB believe that the local economy should be enhanced, with additional employment opportunities, not simply maintained. In market towns and villages, there is a tendency for commercial properties to be turned over to residential use, as this will</p>	The text should be changed to this: to extend commercial enterprise and employment opportunities in the market towns and large villages;	No, I do not wish to participate at the oral examination	

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													give a higher return to the owner or landlord. However, over time this is damaging to the local economy, and to the idea of sustainable towns and villages, damaging to the environment through additional need to travel (to access jobs), and so on.			
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Paragraph	Strategic Objective 15	6.2	Objecting	No		c) Consistent with national policy	The bullet 15 says this:  To minimise the effects of pollution on people and the environment  I think this is not strong enough to meet the intention of the sustainable development policy referred to earlier in the document. The Objective should be to reduce both absolute levels of pollution, AND the effects on people and the environment.	The phrase should read:  To reduce absolute levels of pollution and to reduce the effects of pollution on people and the environment.	No, I do not wish to participate at the oral examination	
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Paragraph	Strategic Objective 2 (and Section 8, Strategic Objectives also)	6.2	Objecting	No	No	c) Consistent with national policy	One of the stated strategic objective here (and in section 6) is to "To mitigate and adapt to the impacts of climate change." This is inconsistent with the text further down in section 8.3, in Figure 9, especially the text in the top left hand box, which reads "Respecting the limits of the planet's environment....to improve our natural environment and to ensure that the natural resources needed for life are unimpaired...." Climate change mitigation (ie mitigation of the risks associated with climate change) is insufficient to achieve this. We need dramatic reduction of human contributions to climate change driving phenomena, such as greenhouse gas emissions, deforestation, poor land management, and so on. In this regard the wording is not just too weak, it is non-compliant with the letter or the sentiment of the reference document.	The objective should be changed to this:  To reduce emissions of greenhouse gasses, to reduce the pressure on the environment (protect biodiversity and reduce water stress) and to mitigate the risks and adapt to the impacts of climate change.	Yes, I wish to participate at the oral examination	This is THE fundamental pillar of what the core strategy should be trying to achieve. It is critical to the survival of the human race on the planet that we galvanise into effective action on climate change, instead of talking round the subject and doing almost nothing in the process. TTB feels very strongly that the Core Strategy could entirely miss the point here, so we would like to speak on this point, and to make sure that the impacts on the

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													<p>In the document :Planning Policy Statement : Planning and Climate Change, one of the stated objectives is this:</p> <p>In providing for the homes, jobs, services and infrastructure needed by communities, and in renewing and shaping the places where they live and work, secure the highest viable resource and energy efficiency and REDUCTION IN EMISSIONS.</p> <p>So in summary, the objective here should not be about climate change mitigation and adaptation, but also reduction in the driving emissions of climate change.</p>			document and on future council and planning strategy are realised.
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	6.2	6.2	Supporting	Yes	Yes		The Trust welcomes and supports the broad strategic objectives, particularly objectives 11 and 16.			
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Paragraph	Strategic Objectives	6.2	Objecting	Yes	No	c) Consistent with national policy	<p>In PPS1 addendum on CLimate Change, one of the stated objectives is to increase community resilience. To that end, Transition Town Berkhamsted believe that the development of local food sources, distribution mechanisms and outlets are a key requirement. Therefore, this section of the Core Strategy is inconsistent with national policy, in that any specific mention of local food is missing. We appreciate that what is and what is not required to achieve resilience is not explicitly spelled out in PPS1, however, the addition of an abjective about local food would arguably develop this quality that is sought.</p>	<p>Add an objective as follows:</p> <p>"To develop local food sources, distribution mechanisms and outlets as part of a local food strategy, to increase resilience in our communities."</p>	Yes, I wish to participate at the oral examination	Transition Town Berkhamsted feel this is one of the fundamental needs of communities looking forwards, and as such it should be a key theme of the Core Strategy and of planning policy in the borough over the coming decades. We would like to explain in more detail why this aspect of community development is so critical, and would appreciate the opportunity to

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																Speak as part of the oral examination.
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	6.2	6.2	Objecting	Yes	No	c) Consistent with national policy	<p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies</p>	Redraft Objective 12 to read 'to conserve and enhance Dacorum's distinctive landscape character' in order to comply with the National Parks and Access to the Countryside Act 1949, the Countryside and Rights of Way Act 2000 and Planning Policy Statement 7.	No, I do not wish to participate at the oral examination	

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													<p>etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The Board welcomes and generally supports the Strategic Objectives. However, Objective 12, which the Board considers is the objective that relates directly to the Chilterns AONB, states that the aim is 'to protect and enhance Dacorum's distinctive landscape character'. The Board considers that this should be redrafted to read 'to conserve and enhance Dacorum's distinctive landscape character' in order to</p>			

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													comply with the National Parks and Access to the Countryside Act 1949, the Countryside and Rights of Way Act 2000 and Planning Policy Statement 7.			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	6.2	6.2	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>The assumptions made in relation to Dacorum (DBC)'s suggested distribution of new development and the settlement hierarchy are critically flawed.</p> <p><u>Hemel Hempstead Focus</u></p> <p>DBC's settlement hierarchy is focussed on Hemel Hempstead being identified as a "Main Centre for Development and Change." This draws on the remnants of the East of England Regional Plan which was legally challenged in the High Court and as a result the substantial Green Belt extensions originally proposed around Hemel Hempstead were remitted to the Secretary of State to be treated as not approved or adopted. The principle reason being that the SEA procedure to justify this level of future development growth at Hemel Hempstead was found flawed. There is no extant regional policy, therefore, that considers future growth at Hemel Hempstead and notwithstanding this the sustainability credentials for large Green Belt extensions around the town were challenged. This is also a slightly historical debate as the Localism Bill has now been enacted at the time of writing and whilst the part of the Act requiring formal revoking of regional plans remains (as the Commencement Order is yet to be issued) it clearly shows the intent of the Government to abolish</p>		Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.



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													<p>regional plans as quickly as possible.</p> <p>Further, GUI's Housing Demand and Socio-Economic Assessment, November 2011 which considers the expected natural population (and household) growth at Hemel Hempstead concludes that limited or no Green Belt land release would be required. This, coupled with the fact that the sustainability credentials of substantial Green Belt land release around the town have also been challenged (as cited above), places questions around the extent of future development growth at Hemel Hempstead.</p> <p>However, it is also acknowledged that Hemel Hempstead is the largest town within the borough and should take some growth. It is for DBC to recommend on these aspects in terms of future development growth at Hemel Hempstead.</p> <p>GUI's position has and continues to be that strategic development growth at the second largest and important market town of the borough - Berkhamsted - offers the best solution in meeting the housing needs and demands of the town whilst representing strategic and complementary housing growth to Hemel Hempstead.</p> <p><u>The "Market Towns" and the Role of Berkhamsted</u></p> <p>Planning Policy Statement 1 (PPS 1) and Planning Policy Statement 3 (PPS3) encourage a sufficient quantity of housing to meet need and demand and to ensure improved choice. Both also encourage new housing</p>			

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													<p>development in suitable locations which offer a good range of community facilities with good access to jobs, key services and infrastructure. The Official Draft National Planning Policy Framework (NPPF) echoes the same issues, in particular the importance of</p> <p>housing demand being met at the right market locations whilst actively encouraging new development which brings forward new homes and delivers new and improved infrastructure.</p> <p>Turning to DBC's suggested settlement hierarchy as reflected within draft CS Policy CS1 concerning Distribution of Development, the following points are made.</p> <p>The definition of Hemel Hempstead as a "Main Centre for Development Change" has already been questioned, as per the above comments.</p> <p>In relation to the definition of "Market Towns", Tring should not be considered within the same category as Berkhamsted under the Council's draft settlement hierarchy, as identified in draft Table 1 (page 54) of the consultation document. It should be defined as a "Small Market Town" as reflected in GUI's suggested re-wording of Table 1 (below) supporting draft Policy CS1.</p> <p>Berkhamsted and Tring are not one and the same in terms of their categorisation. There are very distinctive differences in terms of the size of the existing population together with the level of local facilities, services and retail provision within each and their</p>			

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													<p>potential to expand in meeting local housing and development demands and needs.</p> <p>Berkhamsted has an estimated population of 23,747 (ONS 2008, published 2010) and is second largest (in household population) within Dacorum's draft settlement hierarchy following Hemel Hempstead. Tring on the other hand is a significantly smaller settlement in population size (15,974, ONS 2008, published 2010) and contains a limited number of facilities and retail provision when compared to Berkhamsted. They are both very different in character and function and how they contribute economically to the borough. In terms of market demand it is evident that the demand for new homes is much greater at Berkhamsted as a larger market town, which is well connected (by rail and road) and within commutable distance to London. Planned housing growth should always be directed to the right market locations.</p> <p>Historically, DBC as an Authority have recognised this. Adopted Policy 2 of Dacorum's Local Plan (adopted 2004) states that "development will generally be directed to the towns of Berkhamsted, Hemel Hempstead and Tring." The supporting text identifies that "Hemel Hempstead will take the largest share of development for housing and employment purposes. Opportunities for development at Berkhamsted (including the urban area of Northchurch Parish) are more limited. Tring is the smallest town and the most constrained. Very limited opportunities are likely in Tring." This acknowledges that Tring, as a smaller market town, has</p>			

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													<p>a very different current and future role from Berkhamsted as a larger market town (although the reference to Berkhamsted's more limited development opportunity is not agreed with, in principle, and dealt with below).</p> <p>In addition, the Emerging Core Strategy published in June 2009 acknowledges that Berkhamsted is the "second highest ranking settlement" within the Borough that "would normally accommodate a significant share of growth relative to Tring and the other large villages." The Pre-Submission CS identifies Berkhamsted as the "second largest settlement in the borough" at draft paragraph 21.1.</p> <p>Further, DBC's Emerging Core Strategy (June 2009) identified the overall vision of Berkhamsted in creating a "vibrant market town" as "an important town" to the borough. The CS Plan recognises that "no town can sustain itself unless there is investment and it can adapt and grow."</p> <p>The Authority themselves therefore appear confused on what the future role of Berkhamsted should be and have been inconsistent in their approach. This is most likely due to political pressures not to expand a market town where a local community would not support it but where such expansion is a real necessity now to meet future generation's needs in order to sustain the future status and function of Berkhamsted.</p> <p>GUI's Housing and Socio-Economic Assessment, November 2011, is conclusive that there is a critical need to expand Berkhamsted to</p>			

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													<p>meet future housing demands. Based on the latest population and household projections (ONS 2008), Berkhamsted has a future housing requirement of some additional 2,871 new homes (to 2031). This is significantly beyond the level DBC have planned for the town. The actual growth levels for the town also need to be acknowledged in the ranking of Berkhamsted within the settlement hierarchy.</p> <p>On the above basis, Draft Policy CS1 of the draft Pre-Submission Core Strategy needs to identify Berkhamsted as a Large market Town of an "Area of Strategic Development Opportunity".</p> <p>Future development growth should be directed where it can be sustained by existing and potentially new social and transportation infrastructure.</p> <p>Berkhamsted offers this opportunity and should be fully recognised in this respect alongside meeting local housing needs where there is a clear demand. Its role, character and function should therefore be enhanced. This approach would be consistent with the Pre-Submission Core Strategy in terms of achieving economic sustainability by investing for new homes (and businesses).</p> <p>Strengthening the role of Berkhamsted, as an important market town, would represent good planning in creating sustainable development which complements growth at Hemel Hempstead whilst also enhancing the unique aspects of the town itself. Its enhanced status would also identify opportunities for creating existing and new communities with a sense</p>			

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													<p>of place and identity. In addition, this approach would locate future growth where it could enhance opportunities for national and regional linkages particularly in terms of housing and economic growth within this important</p> <p>London Commuter Belt sub-region alongside future development growth identified at Hemel Hempstead. This approach also meets many of the strategic and local objectives of the Pre-Submission CS (which are explored in further detail within GUI's Planning Document which forms part of this evidence base).</p> <p>On the above basis, the objective to "maintain the vitality and viability of the settlement" is supported, however, Berkhamsted cannot be defined within the same category as Tring (as a much smaller market town) and the Large Villages within the borough in terms of accommodating future development growth.</p> <p>It is important that the large market town expands to meet its future housing needs and demands. GUI have created a solution for meeting this housing demand in identifying Land South of Berkhamsted as a Housing Allocation in the form of a sustainable and deliverable urban extension to the southern edge of the town. The Proposals are described in detail within GUI's Planning Document forming part of this evidence base and within GUI's response to policies and allocations contained within the Berkhamsted Chapter of the CS.</p> <p><u>Conclusions on soundness of draft Policy CS1: Distribution of</u></p>			

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													<p><u>Development</u></p> <p>Draft policy CS1 is not justified because the evidence on which the settlement hierarchy is based is not considered robust or credible. The current identification of Berkhamsted, Tring and Largestrategy when considered against the reasonable alternatives.</p> <p>Draft policy CS1 is not effective as it would not deliver the quantum or distribution of housing needed in the Borough to meet natural population and household growth.</p> <p>Draft policy CS1 is not consistent with national policy because it does not represent a basis for deciding where the planned location of new housing is distributed.</p> <p>It is strongly recommended, therefore, that CS policy recognises Berkhamsted as an important market town which could accommodate sustainable, strategic development growth complementary to the future role of Hemel Hempstead.</p> <p>Berkhamsted should not therefore be defined as an "Area of Limited Opportunity" but instead under the definition as an "Area of Strategic Development Opportunity." Draft CS1 should be amended as such to reflect this position to ensure it is sound and in accordance with PPS1, PPS3, PPS12 and the official Draft NPPF.</p> <p>On the above basis, it is also recommended that (1) Table 1 of the CS is amended (as recommended below); (2) Map 1, the Key Diagram is amended (as</p>			

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													recommended below).  It is also recommended that (1) "Dacorum 2031: A Vision" (paragraph 5.1; at page 33) of the Pre-Submission CS (2) the strategic objectives (at paragraph 6.2 of the CS) and (3) strategic objectives as set out at page 51 of the draft CS - are all amended to acknowledge that Berkhamsted is an important market town and an "Area of Strategic Development Opportunity" in accommodating new strategic development in the form of a sustainable, urban extension to the south of the town.			
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Boyer Planning	Paragraph	16.2	6.2	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Consistent with national policy.  Whilst the Strategic Objectives are generally supported, the approach to housing provision at Hemel Hempstead in Objective 10 is too restrictive- See Section Three of Statement.	Objective 10 (on page 38 of the Plan) should be amended from "To provide a mix of new homes to meet the needs of the population" to " <b>To provide sufficient housing to meet the future needs of the Borough.</b> "	Yes, I wish to participate at the oral examination	Significant issue relating to housing provision, spatial strategy, Hemel Hempstead Place Strategy.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Strategic Objectives 12	6.2	Supporting	Yes	Yes		This comment relates to the Strategic Objectives of the Core Strategy identified in Paragraph 6.2 and the associated table.  Therefore, it is our client's view that the Strategic Objectives put forward in the Pre-Submission Core Strategy propose an appropriate, sensitive approach that will fulfil the Council's vision for Dacorum.  In addition, there is Strategic Objective 12, which states the need to protect and enhance the landscape character, open spaces, biological and geological diversity, and historic environment. This objective is supported. However, it		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the



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													is stressed that these considerations must be set against other objectives such as delivering development, which is required to meet economic growth and housing demand.			opportunity to participate in all relevant discussions at the Examination in Public.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Strategic Objectives 4	6.2	Supporting	Yes	Yes		<p>This comment relates to the Strategic Objectives of the Core Strategy identified in Paragraph 6.2 and the associated table.</p> <p>Therefore, it is our client's view that the Strategic Objectives put forward in the Pre-Submission Core Strategy propose an appropriate, sensitive approach that will fulfil the Council's vision for Dacorum.</p> <p>In particular, support is given for Strategic Objectives 4, 5 and 10, which will assist in delivering a sustainable supply of housing to meet the needs of the Borough over the plan period.</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Strategic Objectives 5	6.2	Supporting	Yes	Yes		<p>This comment relates to the Strategic Objectives of the Core Strategy identified in Paragraph 6.2 and the associated table.</p> <p>Therefore, it is our client's view that the Strategic Objectives put forward in the Pre-Submission Core Strategy propose an appropriate, sensitive approach that will fulfil the Council's vision for Dacorum.</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions</p>

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													In particular, support is given for Strategic Objectives 4, 5 and 10, which will assist in delivering a sustainable supply of housing to meet the needs of the Borough over the plan period.			relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Strategic Objectives 10	6.2	Supporting	Yes	Yes		<p>This comment relates to the Strategic Objectives of the Core Strategy identified in Paragraph 6.2 and the associated table.</p> <p>Therefore, it is our client's view that the Strategic Objectives put forward in the Pre-Submission Core Strategy propose an appropriate, sensitive approach that will fulfil the Council's vision for Dacorum.</p> <p>In particular, support is given for Strategic Objectives 4, 5 and 10, which will assist in delivering a sustainable supply of housing to meet the needs of the Borough over the plan period.</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	Paragraph	6.2	6.2	Supporting	Yes	Yes		USS remain support of Strategic Objectives 7 and 9 which seek to ensure the effective use of existing land and previously developed sites and promote a vibrant and prosperous economy in order to develop the Maylands Business Park as a leader of 'green enterprise' and focus on the low			

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													carbon economy.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust					Figure 7	Table Figure 7	Objecting	Yes	No	b) Effective	We support the reference to the BAP, local BAP, Chilterns AONB Management Plan and Green Space Strategy in Figure 7 (Chapter 6). We recommend reference is also made to the Dacorum Borough Green Infrastructure Plan and Hertfordshire Green Infrastructure Plan(Land Use Consultants/HCC, March 2011; Land Use Consultants/DBC, March 2011), which should be important guiding influences and evidence underlying the Core Strategy and the shape and nature of future development in the Borough.	In Figure 7, chapter 6, we recommend reference is also made to the Dacorum Borough Green Infrastructure Plan and Hertfordshire Green Infrastructure Plan(Land Use Consultants/HCC, March 2011; Land Use Consultants/DBC, March 2011).	No, I do not wish to participate at the oral examination	
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design		Figure 8	Table Figure 8	Objecting	Yes	No	a) Justified	It is widely recognised that adequate and improved social infrastructure provision directly contributes to reduction in crime and creating a safer community.	Add Policy CS23 to the list of Principal Core Strategy Policies alongside the "Reducing Crime" Community Strategy Objective.	Yes, I wish to participate at the oral examination	
366491	Mr Brian Worrell					Paragraph	7.4 Promoting culture, arts, leisure and tourism	7.4	Objecting	Yes	No	b) Effective	In the whole of this document, this is the first time that 'tourism' is mentioned. There appears to be no realisation that tourism can provide significant inward investment if done right. This requires joined up thinking about what culture (heritage, arts and sport) can encourage to people to want to visit Dacorum. Tourism can be the glue that binds these three themes together. Section 11.15 makes some attempt at expanding ideas on tourism, but is insufficient. Tourism can also drive the vision of where the canal, the railway, the various moors, gateway to the Chilterns, Ashridge, performing arts, heritage centres/museums, sports events, and so on. Visionary transport can be added. I suggest this paragraph can be much expanded to lay out exciting aspirations for the Borough.	Much more work would need to be done on this as I don't know what I don't know. I just believe there is a lost opportunity here.		
6112	Mr	New Gospel	4796	Mr	J & J	Promoting	Strategic	8	Supporting	Yes	Yes		The Trust welcomes and supports			

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53	B Moffitt	Hall Trust	03	John Shephard	Design	sustainable development	Objectives		ng	s	s		the Strategic Objectives especially - "To promote healthy and sustainable communities and a high quality of life" and "To promote social inclusion and cohesiveness, embrace diversity and reduce inequalities." It is considered that the Strategic Objectives are compatible with and supported by the objectives of draft NPPF paragraph 10.			
211072	Ms Katherine Fletcher	English Heritage				Promoting sustainable development	Section 8	8	Supporting	Yes	Yes		We are pleased to see that the policies in this section refer to protecting the local character and environmental assets of the district.			
630502	Mr Richard Scott		609961	Mr Laurence Wilbraham		Promoting sustainable development	The Sustainable Development Strategy, Strategic Objectives	8	Objecting	Yes	No	b) Effective	The strategic objectives at the top of page 51 do not set out any requirement to meet the borough's housing requirements in the plan period.	Include in the strategic objectives the following bullet Point:- * to ensure that sufficient housing is developed in the Plan period to meet the borough's housing requirements.	No, I do not wish to participate at the oral examination	
488516	mr Hugh siegle					Paragraph	8.2	8.2	Supporting	Yes	c) Consistent with national policy	I support the approach; the challenge is to meet perceived current needs without compromising existing quality of life let alone that of future generations. The growth proposals for the Borough put these aspirations at risk. This is compounded by the intentions of various landowners to develop on Green Belt land, contrary to the current and future policies of the Borough and Central Government. These must be resisted.		No, I do not wish to participate at the oral examination		
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.2	8.2	Supporting	Yes	Yes		BRAG supports the sustainability objective but is worried that DBC will fail to comply if the infrastructure is not fixed before developments commence. Large developments in Berkhamsted would put excessive strain on the already deficient		No, I do not wish to participate at the oral examination	

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													infrastructure in schooling, health care, water and sewage, transport, roads and parking etc. Hence leading to a worse quality of life for present residents while compromising the needs of future generations, as would the removal of land from the Green Belt - thus failing the sustainability test. See also BRAG submission to paragraph 21.1			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	8.3	8.3	Supporting	Yes	Yes		The Trust welcomes the restatement of the Principles of Sustainable Development from the UK Sustainable Development Strategy and subsequent text showing how this has been applied to the Core Strategy and the whole LDF.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	8.5	8.5	Supporting	Yes	No	b) Effective	<p>We are pleased to see that Dacorum Borough Council has on the whole taken a balanced approach to sustainability in its Core Strategy, which appears as a clear, common and consistent thread throughout most of the document. The first sentence of paragraph 8.5 is a very accurate and encouraging statement: "There is no specific policy on sustainable development, as its goals can only be achieved through the combined effects of the whole Local Planning Framework." We agree absolutely with this view. Whilst this fact makes the compilation of an effective and sound Core Strategy quite challenging, HMWT recognises that Dacorum's CS has attempted to achieve this, with a good breadth of Strategic Objectives, and specific references to and intention to address various key environmental issues in the borough.</p> <p>We are pleased to note the focus given to sustainability in the built environment. This is necessary to</p>	<p>Ensure consistency when discussing sustainability and sustainable development in the Core Strategy, Policies and supporting documents and guidance to ensure no perverse outcomes on other sustainability objectives.</p> <p>Paragraph 4.8, Challenge 6, makes reference to the <i>mitigation</i> of climate change impacts through sustainable design and construction. It would be better here to say "mitigate against and adapt to the impacts of climate change". Moreover, it would be preferable to see here a reference to the other benefits of sustainable design and construction, mentioned in paragraphs 18.19 and 18.22, for instance. The Sustainable Development Advice Note</p>	No, I do not wish to participate at the oral examination	

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													secure real gains for biodiversity and ecological connectivity and functioning, which cannot be achieved through focusing on designated sites and isolated patches. There is a need to take a whole landscape approach to deal with these issues.	cited in paragraph 8.5 does not really offer advice on Sustainability broadly, but rather one element of this concept (ie. carbon emission reduction and climate change mitigation). This undermines the broader approach to SD hinted at in the first sentences of that paragraph and elsewhere in the text and illustrated in Figures 9 and 10. This weakness either needs addressing, or further guidance produced to counterbalance it.		
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	8.6	8.6	Objecting	Yes	No	b) Effective	Despite these positive observations and general solid direction of the Core Strategy, some inconsistency comes through between and within certain sections, and between Policies and the supporting text. We are concerned about an apparently dominant focus on carbon emissions and climate change mitigation in some sections, which creates inconsistency and some confusion within the Strategy.  Paragraph 4.8, Challenge 6, makes reference to the <i>mitigation</i> of climate change impacts through sustainable design and construction. It would be better here to say "mitigate against and adapt to the impacts of climate change". Moreover, it would be preferable to see here a reference to the other benefits of sustainable design and construction, mentioned in paragraphs 18.19 and 18.22, for instance.  We are concerned that the		No, I do not wish to participate at the oral examination	

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													<p>Sustainable Development Advice Note cited in paragraph 8.5 does not really offer advice on Sustainability broadly, but rather one element of this concept (ie. carbon emission reduction and climate change mitigation). This undermines the broader approach to SD hinted at in the first sentences of that paragraph and elsewhere in the text and illustrated in Figures 9 and 10.</p> <p>The carbon emissions focus comes across in later, related paragraphs on the Sustainability Offset Fund (paragraphs 18.23 - 18.25) (please see later comments on this issue), alongside other paragraphs looking at broader issues and impacts (18.19, 18.20). This creates some confusion.</p> <p>Whilst climate change mitigation is clearly an important aspect of sustainability and we support the Council's desire to reduce carbon emissions and mitigate climate change, there is a need to broaden the scope and consider delivery of multiple benefits for nature, society and communities, including the protection and enhancement of ecosystem services. This is necessary to ensure effective and efficient outcomes from planning and development decisions. The best option for carbon reduction is not always the best option for other aspects of sustainability. Although the apparent focus on climate change mitigation may not have been intentional, it is important to clarify certain points to ensure no perverse outcomes on other</p>			

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													objectives.			
488516	Mr Hugh Siegle					Paragraph	8.7	8.7	Objecting	No	a) Justified		The description of the Borough's diversity is supported but I challenge the assumption that towns need to adapt and grow to survive. Investment may be required to maintain existing settlements and infrastructure; growth is not a requisite	The wording should reflect the above	No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.7	8.7	Objecting	Yes	No	a) Justified	The description of the Borough's diversity is supported, but BRAG challenges the assumption that all the towns need to adapt and grow to survive. Investment may be required to maintain existing settlements and infrastructure; growth is not essential. Some settlements may need to grow (such as Hemel Hemstead) but others do not and a generalised statement should not be applied to all settlements. Indeed, the settlement hierarchy in 8.9 Table 1 for 'Areas Of Limited Opportunity' such as Berkhamsted states that developments should enable "the population to remain stable".		Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	8.7	8.7	Objecting	Yes	No	a) Justified	The assumption that all settlements are not sustainable unless their developed area expands is inaccurate and not justified by evidence, particularly in the case of smaller villages. The emphasis should be on adaptation to meet current and future needs based on the individual character of the settlement, consistent with the statement in paragraph 8.10 that the approach will not necessarily be the same in each category.	Wording to be discussed with Council.	Yes, I wish to participate at the oral examination	To ensure that the Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.8	8.8	Supporting	Yes	Yes		BRAG supports the need to determine the appropriate scale of change to help ensure that existing character is protected and development takes account of environmental constraints. These constraints would rule out large		No, I do not wish to participate at the oral examination	



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													developments in all but Hemel Hempstead.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Settlement Hierarchy	8.9 Table 1	Table 1	Supporting	Yes	Yes		BRAG endorses the settlement hierarchy as laid out in Table 1. BRAG supports the identification of Hemel Hempstead as the main focus of strategic housing growth and emphasises the approach for areas of limited opportunity that "in these locations will be to support development that enables the population to remain stable". It is imperative that Berkhamsted remains classified alongside Tring as an area of limited opportunity in the settlement hierarchy, see BRAG's response to 1.8.		Yes, I wish to participate at the oral examination	It is understood that certain developers are pushing DBC to change the Settlement Hierarchy and specifically to re-classify Berkhamsted as a town that can be used in a larger supporting development role to Hemel Hempstead. It is important that the views of Berkhamsted residents are heard.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Settlement Hierarchy	Table 10	Table 1	Supporting	Yes	Yes					
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Woolf Bond Planning	Settlement Hierarchy	Table 1	Table 1	Objecting	No	No		We generally support the categorisation of Berkhamsted as a 'Market town' within the proposed settlement hierarchy. This settlement is highly accessible, contains a number of key services and facilities and offers a substantive number of employment opportunities. However, we are of the view that the Policy should be amended to include formal reference to the need to bring forward the identified strategic sites at the early stage of the plan process. The land at Durrants Lane/Shootersway site adjoins the Berkhamsted urban area, representing one of the most sustainable locations in helping to meet the housing requirements		No, I do not wish to participate at the oral examination	

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													(including that for affordable) within the Borough.			
488516	mr hugh siegle					Settlement Hierarchy	Table 1	Table 1	Supporting	Yes	Yes		I support the summaries of the settlements with the caveat referred to elsewhere that existing boundaries are maintained		No, I do not wish to participate at the oral examination	
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Settlement Hierarchy	Table 1	Table 1	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>The assumptions made in relation to Dacorum (DBC)'s suggested distribution of new development and the settlement hierarchy are critically flawed.</p> <p>Hemel Hempstead Focus</p> <p>DBC's settlement hierarchy is focussed on Hemel Hempstead being identified as a "Main Centre for Development and Change." This draws on the remnants of the East of England Regional Plan which was legally challenged in the High Court and as a result the substantial Green Belt extensions originally proposed around Hemel Hempstead were remitted to the Secretary of State to be treated as not approved or adopted. The principle reason being that the SEA procedure to justify this level of future development growth at Hemel Hempstead was found flawed. There is no extant regional policy, therefore, that considers future growth at Hemel Hempstead and notwithstanding this the sustainability credentials for large Green Belt extensions around the town were challenged. This is also a slightly historical debate as the Localism Bill has now been enacted at the time of writing and whilst the part of the Act requiring formal</p>	<p><b>Instead of</b> : "Main Centre for Development Regeneration and Change" have "Centre for Regeneration and Change".</p> <p><b>Areas of Strategic Development Opportunity should read:</b></p> <p>2. Large Market Town - Berkhamsted</p> <p>Berkhamsted, as an important market town in the</p> <p>borough, is identified for new homes, employment and enhanced town centre and local facilities, services and retail provision which will be met by the town's regeneration and strategic new</p> <p>development to the south of the town. The southern expansion of the town will assist in meeting the future local housing needs and</p> <p>demands whilst also assisting in meeting the Council's vision and local objectives for the town itself.</p> <p><b>Areas of Limited Opportunity should read:</b></p> <p>3. Small Market Town - Tring</p> <p>Tring and larger villages have an important role in meeting housing needs and providing employment</p>	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.

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													<p>revoking of regional plans remains (as the Commencement Order is yet to be issued) it clearly shows the intent of the Government to abolish regional plans as quickly as possible.</p> <p>Further, GUI's Housing Demand and Socio-Economic Assessment, November 2011 which considers the expected natural population (and household) growth at Hemel Hempstead concludes that limited or no Green Belt land release would be required. This, coupled with the fact that the sustainability credentials of substantial Green Belt land release around the town have also been challenged (as cited above), places questions around the extent of future development growth at Hemel Hempstead.</p> <p>However, it is also acknowledged that Hemel Hempstead is the largest town within the borough and should take some growth. It is for DBC to recommend on these aspects in terms of future development growth at Hemel Hempstead.</p> <p>GUI's position has and continues to be that strategic development growth at the second largest and important market town of the borough - Berkhamsted - offers the best solution in meeting the housing needs and demands of the town whilst representing strategic and complementary housing growth to Hemel Hempstead.</p> <p>The "Market Towns" and the Role of Berkhamsted</p> <p>Planning Policy Statement 1 (PPS 1) and Planning Policy Statement 3 (PPS3) encourage a sufficient</p>	<p>opportunities and services, both for their residents and adjacent rural communities. The general approach in these locations will be to support</p> <p>development that enables the population to remain stable, unless a small element of growth is required to support local community needs.</p>		

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													<p>quantity of housing to meet need and demand and to ensure improved choice. Both also encourage new housing development in suitable locations which offer a good range of community facilities with good access to jobs, key services and infrastructure. The Official Draft National Planning Policy Framework (NPPF) echoes the same issues, in particular the importance of</p> <p>housing demand being met at the right market locations whilst actively encouraging new development which brings forward new homes and delivers new and improved infrastructure.</p> <p>Turning to DBC's suggested settlement hierarchy as reflected within draft CS Policy CS1 concerning Distribution of Development, the following points are made.</p> <p>The definition of Hemel Hempstead as a "Main Centre for Development Change" has already been questioned, as per the above comments.</p> <p>In relation to the definition of "Market Towns", Tring should not be considered within the same category as Berkhamsted under the Council's draft settlement hierarchy, as identified in draft Table 1 (page 54) of the consultation document. It should be defined as a "Small Market Town" as reflected in GUI's suggested re-wording of Table 1 (below) supporting draft Policy CS1.</p> <p>Berkhamsted and Tring are not one and the same in terms of their categorisation. There are very distinctive differences in terms of</p>			

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													<p>the size of the existing population together with the level of local facilities, services and retail provision within each and their potential to expand in meeting local housing and development demands and needs.</p> <p>Berkhamsted has an estimated population of 23,747 (ONS 2008, published 2010) and is second largest (in household population) within Dacorum's draft settlement hierarchy following Hemel Hempstead. Tring on the other hand is a significantly smaller settlement in population size (15,974, ONS 2008, published 2010) and contains a limited number of facilities and retail provision when compared to Berkhamsted. They are both very different in character and function and how they contribute economically to the borough. In terms of market demand it is evident that the demand for new homes is much greater at Berkhamsted as a larger market town, which is well connected (by rail and road) and within commutable distance to London. Planned housing growth should always be directed to the right market locations.</p> <p>Historically, DBC as an Authority have recognised this. Adopted Policy 2 of Dacorum's Local Plan (adopted 2004) states that "development will generally be directed to the towns of Berkhamsted, Hemel Hempstead and Tring." The supporting text identifies that "Hemel Hempstead will take the largest share of development for housing and employment purposes. Opportunities for development at Berkhamsted (including the urban area of Northchurch Parish) are more limited. Tring is the smallest</p>			

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													<p>town and the most constrained. Very limited opportunities are likely in Tring." This acknowledges that Tring, as a smaller market town, has a very different current and future role from Berkhamsted as a larger market town (although the reference to Berkhamsted's more limited development opportunity is not agreed with, in principle, and dealt with below).</p> <p>In addition, the Emerging Core Strategy published in June 2009 acknowledges that Berkhamsted is the "second highest ranking settlement" within the Borough that "would normally accommodate a significant share of growth relative to Tring and the other large villages." The Pre-Submission CS identifies Berkhamsted as the "second largest settlement in the borough" at draft paragraph 21.1.</p> <p>Further, DBC's Emerging Core Strategy (June 2009) identified the overall vision of Berkhamsted in creating a "vibrant market town" as "an important town" to the borough. The CS Plan recognises that "no town can sustain itself unless there is investment and it can adapt and grow."</p> <p>The Authority themselves therefore appear confused on what the future role of Berkhamsted should be and have been inconsistent in their approach. This is most likely due to political pressures not to expand a market town where a local community would not support it but where such expansion is a real necessity now to meet future generation's needs in order to sustain the future status and function of Berkhamsted.</p>			

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													<p>GUI's Housing and Socio-Economic Assessment, November 2011, is conclusive that there is a critical need to expand Berkhamsted to meet future housing demands. Based on the latest population and household projections (ONS 2008), Berkhamsted has a future housing requirement of some additional 2,871 new homes (to 2031). This is significantly beyond the level DBC have planned for the town. The actual growth levels for the town also need to be acknowledged in the ranking of Berkhamsted within the settlement hierarchy.</p> <p>On the above basis, Draft Policy CS1 of the draft Pre-Submission Core Strategy needs to identify Berkhamsted as a Large market Town of an "Area of Strategic Development Opportunity".</p> <p>Future development growth should be directed where it can be sustained by existing and potentially new social and transportation infrastructure.</p> <p>Berkhamsted offers this opportunity and should be fully recognised in this respect alongside meeting local housing needs where there is a clear demand. Its role, character and function should therefore be enhanced. This approach would be consistent with the Pre-Submission Core Strategy in terms of achieving economic sustainability by investing for new homes (and businesses).</p> <p>Strengthening the role of Berkhamsted, as an important market town, would represent good planning in creating sustainable development which complements growth at Hemel Hempstead whilst also enhancing the unique aspects</p>			

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													<p>of the town itself. Its enhanced status would also identify opportunities for creating existing and new communities with a sense of place and identity. In addition, this approach would locate future growth where it could enhance opportunities for national and regional linkages particularly in terms of housing and economic growth within this important</p> <p>London Commuter Belt sub-region alongside future development growth identified at Hemel Hempstead. This approach also meets many of the strategic and local objectives of the Pre-Submission CS (which are explored in further detail within GUI's Planning Document which forms part of this evidence base).</p> <p>On the above basis, the objective to "maintain the vitality and viability of the settlement" is supported, however, Berkhamsted cannot be defined within the same category as Tring (as a much smaller market town) and the Large Villages within the borough in terms of accommodating future development growth.</p> <p>It is important that the large market town expands to meet its future housing needs and demands. GUI have created a solution for meeting this housing demand in identifying Land South of Berkhamsted as a Housing Allocation in the form of a sustainable and deliverable urban extension to the southern edge of the town. The Proposals are described in detail within GUI's Planning Document forming part of this evidence base and within GUI's response to policies and allocations contained within the Berkhamsted</p>			



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													<p>Chapter of the CS.</p> <p>Conclusions on soundness of draft Policy CS1: Distribution of Development</p> <p>Draft policy CS1 is not justified because the evidence on which the settlement hierarchy is based is not considered robust or credible. The current identification of Berkhamsted, Tring and Largestrategy when considered against the reasonable alternatives.</p> <p>Draft policy CS1 is not effective as it would not deliver the quantum or distribution of housing needed in the Borough to meet natural population and household growth.</p> <p>Draft policy CS1 is not consistent with national policy because it does not represent a basis for deciding where the planned location of new housing is distributed.</p> <p>It is strongly recommended, therefore, that CS policy recognises Berkhamsted as an important market town which could accommodate sustainable, strategic development growth complementary to the future role of Hemel Hempstead.</p> <p>Berkhamsted should not therefore be defined as an "Area of Limited Opportunity" but instead under the definition as an "Area of Strategic Development Opportunity." Draft CS1 should be amended as such to reflect this position to ensure it is sound and in accordance with PPS1, PPS3, PPS12 and the official Draft NPPF.</p> <p>On the above basis, it is also</p>			

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													recommended that (1) Table 1 of the CS is amended (as recommended below); (2) Map 1, the Key Diagram is amended (as recommended below).  It is also recommended that (1) "Dacorum 2031: A Vision" (paragraph 5.1; at page 33) of the Pre-Submission CS (2) the strategic objectives (at paragraph 6.2 of the CS) and (3) strategic objectives as set out at page 51 of the draft CS - are all amended to acknowledge that Berkhamsted is an important market town and an "Area of Strategic Development Opportunity" in accommodating new strategic development in the form of a sustainable, urban extension to the south of the town.			
498429	Steve Baker	CPRE - The Hertfordshire Society				Settlement Hierarchy	Table 1	Table 1	Objecting	Yes	No	a) Justified	The wording of Table 1 Areas of Development Restraint referring to small villages inaccurately describes them as "the least sustainable areas of the borough". History shows that they are in fact highly sustainable, whereas we believe the Council intended to state that they are the least sustainable locations for new development other than that required to meet their own needs.	Wording to be discussed with Council.	No, I do not wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Settlement Hierarchy	Table 1	Table 1	Supporting	Yes	Yes		P54 Table 1 Support  I support the settlement hierarchy as set out in Table1. In particular housing development and employment opportunities should be concentrated in Hemel Hempstead as the settlement has more sustainable infrastructure.  Nonetheless consideration should be given to provision of additional employment opportunities in other settlements to address the changing		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.

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													nature of employment, lessen the attraction or obligation to commute long distances, and reduce reliance on cars/buses/trains to access employment.			
494131	Mr Michael Emmett	CALA Homes				Settlement Hierarchy	Table 1	Table 1	Objecting	Yes	No	b) Effective	<p>The settlement hierarchy proposed in Policy CS1 and Table 1 is fully supported. It is agreed that Hemel Hempstead, as the Borough's principal town, should be the main focus for new development. Recognition that the market towns of Berkhamsted and Tring, as second tier settlements, have important roles to play in meeting housing needs is also welcomed. It is, however, suggested that the policy more clearly differentiates these towns from third tier larger villages. As presented in the Core Strategy, Table 1 could be taken to imply a degree of parity between the two; in fact the market towns are considerably more sustainable and should accommodate commensurately more growth. This should be made explicit in both Table 1 and Policy CS1.</p> <p>More fundamentally, because the overall level of housing provision in the Borough (Policy CS17) is too low, the ability of the market towns, particularly Tring, to fulfil their housing role is severely undermined. This is addressed in more detail in a separate representation on Policy CS17.</p>	Greater differentiation between the roles of the market towns and larger villages is required. Table 1 and Policy CS1 should be reworded in order to recognise that the former are more sustainable and should accommodate commensurately more development.	Yes, I wish to participate at the oral examination	CALA Homes has a controlling interest in the Icknield Way Tring Local Allocation and as such has an important role to play in delivering a key element of the Core Strategy.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Settlement Hierarchy	Table 1	Table 1	Supporting	Yes	Yes		<p>This comment relates to Policy CS1 and Table 1: Settlement Hierarchy. The approach in both the policy and table is supported.</p> <p>It is considered that locating the majority of housing at Hemel Hempstead will result in the most</p>		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing

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													sustainable pattern of living for the Borough. It will enable homes and jobs to be located in close proximity and will provide the population with nearby access to shops, facilities and public transport. In other words, it will help deliver balanced and sustainable growth.			delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd	Settlement Hierarchy	Table 1	Table 1	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  The Trustees consider that there needs to be a more explicit reference in Table 1, Settlement Hierarchy, and Policy CS1 to encouraging and facilitating mixed uses wherever possible. These will often, in practice, be the more viable of schemes, and better able to be delivered in poor economic circumstances or in times of recession. A new criterion (g) in Policy CS1 with reference to Hemel Hempstead itself would be an appropriate place for that.		No, I do not wish to participate at the oral examination	
5018 74		E.J. Hillier Will Trust	3987 19	Ms Jo Emmett	Hives Planning	Settlement Hierarchy	Table 1	Table 1	Objecting	Yes	No	a) Justified	That Hemel Hempstead should be the principal focus for development is supported, as it is the most sustainable settlement in the Borough. However it is considered that the Core Strategy plans for insufficient development - as a proportion of the total - in the market towns and large villages (notwithstanding that the total level	Amend Policy CS1 to read: "The market towns and larger villages will accommodate new development for housing employment and other uses, that: i) is of a scale commensurate with the size of the settlement and the range of local services and facilities, and its role in providing for the housing, employment and	Yes, I wish to participate at the oral examination	To enable a full discussion of the issues raised and assist the Inspector in responding to these, as appropriate.

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													<p>of development is also considered to be</p> <p>Insufficient - see representations to Policy CS17).</p> <p>It is confusing for Policy CS1 to group both the market towns and larger villages under 'Areas of Limited Opportunity' as it is not clear how their separate categorisation influences the strategy for development within these settlements. This is compounded by Table 1, which shares the explanatory text for the two categories. Notwithstanding this, the general approach</p> <p>set out in Table 1 is not considered sound as it states that in Areas of Limited Opportunity development will be supported "that enables the population to remain stable". This approach is not sustainable. Instead these settlements should provide for an element of growth to support local community needs, especially given that in all other areas of the Borough (aside from Hemel Hempstead) there will be a policy of "development restraint". This needs to be reflected in the housing numbers for the market towns and larger villages, which should at least accommodate 'natural population growth' (again, see representations to Policy CS17).</p> <p>Table 1 notes that the larger settlements have a role in providing for both their own residents</p> <p>and those of adjacent rural communities, yet this is not reflected in the overall level of housing provision set out in Policy CS17. The Core Strategy as drafted is therefore inconsistent and Policy</p>	<p>other needs of it and the surrounding settlements it serves".</p> <p>Land at Grange Farm, Bovingdon should be identified as a local allocation. The allocation should include greater total housing provision (and should include affordable housing and housing for the elderly), plus open space and allotments.</p>		

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													<p>CS1 does not represent the most appropriate strategy when considered against the reasonable alternatives (i.e. Is unsound under the terms of PPS12).</p> <p>It is considered that a higher level of development can appropriately be accommodated in the market villages and larger towns, given their sustainability credentials. For example at Bovingdon, land at Grange Farm could appropriately provide for the current proposed level of growth for the village, but also additional needs of the rural communities that the village serves.</p> <p>The Vision for Bovingdon sets out that over the plan period new development in the village will have secured a high level of affordable housing and new open space. Paragraph 24.2 also references provision of 60 new homes on the edge of the village, a residential care home for the elderly and allotments in the village. The local allocation, termed Proposal LA6, is how the Council envisages delivering this vision for Bovingdon; however this is not the most appropriate strategy when considered against the reasonable alternatives (i.e. other sites in the village) - and is therefore not 'sound'.</p>			
630502	Mr Richard Scott		609961	Mr Laurence Wilbraham		Settlement Hierarchy	Table 1	Table 1	Objecting	Yes	No		Table 1 sets out a settlement hierarchy and under 'areas of Limited opportunity' identifies market towns and large Villages: in tiers 2 and 3 respectively. However the scale of Development in tier 2 is anticipated to be considerably Greater than in tier 3 and therefore the two tiers should be Identified under separate headings. Furthermore the term 'Areas of limited opportunity' does not	Alter 'areas of limited opportunity' in table 1 to 'areas of Moderate growth' and include the tier 2 settlements under this. Add a new sub-heading 'areas of modest growth' and include Under this the tier 3 settlements.	No, I do not wish to participate at the oral examination	

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													accurately reflect The status or scale of development at these settlements.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		BRAG strongly supports POLICY CS1 for the Market Towns. Points (a) to (d) are essential elements in considering any new development on or around the Market Towns. BRAG refers back to 1.8 and 8.9 to stress that no change should be made Berkhamsted's classification as a market town alongside Tring.		Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes					
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes					
211503	Mr Colin White	Chilterns Conservation Board				Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		<p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those</p>		No, I do not wish to participate at the oral examination	

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													<p>purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to</p>			



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													contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.  The Policy is supported as drafted.			
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Woolf Bond Planning	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		Policy CS1 set out the overarching approach to the distribution of development, identifying Hemel Hempstead as the principal focus for growth. The next most sustainable tier of settlement is the market towns of Berkhamsted and Tring.		Yes, I wish to participate at the oral examination	Discussion of key strategic matters.
488516	mr hugh siegle					Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes	a) Justified	I strongly support		No, I do not wish to participate at the oral examination	
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Boyer Planning	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes				Yes, I wish to participate at the oral examination	Significant issue relating to housing provision, spatial strategy, Hemel Hempstead Place Strategy.
611657	Messrs M&D Gardener		611650	Mr John Heginbotham	Stimpsons	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		As Representation on behalf of Taylor Wimpey by Martin Friend	As Representation on behalf of Taylor Wimpey by Martin Friend	Yes, I wish to participate at the oral examination	Our client's land is a significant component of LA3
619662	Mr Euan Macdonald	Unknown	619659	Mr David Lane	DLA Town Planning Ltd	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes				No, I do not wish to participate at the oral examination	
619677		Blackjack Investments Ltd	398614	Mr Mark	Insight Town Planning	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		Our client supports the identification of Tring as a market town. This is important appropriate to its size and		Yes, I wish to participate at the oral	

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				Flood									<p>range of services and facilities.</p> <p>The hierarchial approach of the policy is supported, with Hemel Hempstead as the principal focus for new development.</p> <p>The policy allows for the market towns to accommodate new development subject to four criteria. This allowance is welcomed, although we would comment that as elsewhere within the CS, it would be consistent to insert a reference within criterion (d) that land will be released from the Green Belt only to the extent necessary to enable delivery of planned urban extension. Policy CS1 is the key strategic policy of the CS and for clarity it would be sensible to insert this reference.</p>		examination	
620224	Mr Stephen Harris	Emery Planning Partnership				Distribution of Development	CS1	Policy CS 1	Objecting	No	No	c) Consistent with national policy	<p>We agree that Hemel Hempstead is the main location for housing and employment growth. However, the growth of the other settlements should not be ignored and we support Tring being identified as a second tier settlement.</p> <p>Table 8 sets out the overall distribution of development. The table shows that the vast majority (78%) of new development is to be located at Hemel Hempstead. However despite Tring being only one of the two market towns in the Borough only 4% of the requirement is proposed. This is comparable to the levels of development at the large villages and well below the percentage at Berkhamsted, the other market town.</p> <p>We consider that a requirement of 480 dwellings at Tring is not in</p>		Yes, I wish to participate at the oral examination	

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													<p>accordance with the evidence base and is not sound. We therefore consider that the requirement should be increased to 10% so that Tring can at least deliver sufficient homes to accommodate natural growth. Without this level of development the town will stagnate and push house prices up exacerbating affordability in the town.</p> <p>We consider that this level of development can be accommodated as Tring is relatively self contained in that it has all the necessary shops, services and facilities for its residents and it does not depend on Hemel Hempstead or surrounding settlements for education, health, shopping or leisure. Therefore it is considered that Tring does have the potential for additional development and should have an appropriate level of development. It may therefore be that the percentage of the overall requirement for Dacorum that is located at Tring is greater than the 10% suggested above. Clearly, an appropriate level of development at Tring and the resultant developer contributions will assist in bringing forward new infrastructure such as school places for example.</p>			
498273	Mr Alan Barker		619659	Mr David Lane	DLA Town Planning Ltd	Distribution of Development	CS1	Policy CS 1	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified and is not consistent with national policy.</p> <p>CS1 is generally supported. However the objection to CS1 is on the basis that land at Love Lane, Kings Langley should be removed from the Green Belt for development.</p>	To fully explore the issues raised in the report.	Yes, I wish to participate at the oral examination	
494131	Mr Michael	CALA Homes				Distribution of Development	CS1	Policy CS 1	Objecting	Yes	No	b) Effective	The settlement hierarchy proposed in Policy CS1 and Table 1 is fully supported. It is agreed that Hemel	Greater differentiation between the roles of the market towns and larger villages is required. Table 1	Yes, I wish to participate	CALA Homes has a controlling interest in the

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	Emett												Hempstead, as the Borough's principal town, should be the main focus for new development. Recognition that the market towns of Berkhamsted and Tring, as second tier settlements, have important roles to play in meeting housing needs is also welcomed. It is, however, suggested that the policy more clearly differentiates these towns from third tier larger villages. As presented in the Core Strategy, Table 1 could be taken to imply a degree of parity between the two; in fact the market towns are considerably more sustainable and should accommodate commensurately more growth. This should be made explicit in both Table 1 and Policy CS1.  More fundamentally, because the overall level of housing provision in the Borough (Policy CS17) is too low, the ability of the market towns, particularly Tring, to fulfil their housing role is severely undermined. This is addressed in more detail in a separate representation on Policy CS17.	and Policy CS1 should be reworded in order to recognise that the former are more sustainable and should accommodate commensurately more development.	at the oral examination	Icknield Way Tring Local Allocation and as such has an important role to play in delivering a key element of the Core Strategy.
494847		Trustees of Drayton Beauchamp Parochial Charities	626780		Cole Flatt & Partners	Distribution of Development	CS1	Policy CS 1	Objecting	No	b) Effective		The settlement hierarchy proposed in Policy CS1 and Table 1 is fully supported. It is agreed that Hemel Hempstead, as the Borough's principle town, should be the main focus for new development. Recognition that the market towns of Berkhamsted and Tring, as second tier settlements, have important roles to play in meeting housing needs is also welcomed. It is however, suggested that the policy more clearly differentiates there's towns from third tier larger villages. As presented in the CS, Table 1 could be taken to imply a degree of parity between the two; in fact the market towns are considerably more sustainable and	Refer to the response to question 4 above.	No, I do not wish to participate at the oral examination	

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													<p>should accommodate commensurately more growth. This should be more explicit in both Table 1 and Policy CS1.</p> <p>More fundamentally, because the overall level of housing provision in the Borough (Policy CS17) is too low, when compared with ONS Figures, the ability of the market towns, particularly Tring, to fulfil their housing role has been underestimated.</p>			
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		USS continues to support CS1 as it seeks to place an emphasis on maintaining a balanced distribution of employment growth, with growth and rejuvenation in Maylands Business Park.			
515465	Mr Alan Kemp	Berkhamsted Town Council				Distribution of Development	CS1	Policy CS 1	Objecting	Yes	No	b) Effective	<p>The AONB is mentioned in the next sentence, on the rural area, but is missing from this bullet point, referring to market towns and large villages. The Chilterns Conservation Board has recently published guidelines on development affecting the setting of the Chilterns AONB. This guidance is for local planning authorities, landowners and developers in connection with the need to consider the impacts on the AONB of development which lies outside it but within its 'setting'. Amending this bullet point would draw attention to the need to take account of these guidelines.</p> <p><b>Representation:</b></p> <p><b>1. Page 55 Policy CS1, Support except for final bullet point, (d),</b></p> <p><b>Representation:</b></p> <p><b>1. Page 55 Policy CS1, final bullet point, (d), Object</b></p>	Amend to "is compatible with policies protecting the Green Belt, the Chilterns AONB and Rural Areas."	Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.

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													<p>2. Sound No</p> <p>3. Effective No</p> <p>4. The AONB is mentioned in the next sentence, on the rural area, but is missing from this bullet point, referring to market towns and large villages. The Chilterns Conservation Board has recently published guidelines on development affecting the setting of the Chilterns AONB. This guidance is for local planning authorities, landowners and developers in connection with the need to consider the impacts on the AONB of development which lies outside it but within its 'setting'. Amending this bullet point would draw attention to the need to take account of these guidelines.</p> <p>5. Amend to "is compatible with policies protecting the Green Belt, the Chilterns AONB and Rural Areas."</p>			
620322		West Herts College	620319	Ms Alison Tero	CBRE	Distribution of Development	CS1	Policy CS 1	Objecting	Yes	No		<p>WHC generally supports the Core Strategy focus for development at Hemel Hempstead aligned with its role within the settlement hierarchy and measures to improve the vitality and viability of the centre in accordance with PPS4 and policy CS33 objectives.</p> <p>In providing guidance on new development in Hemel Hempstead WHC recommends that the term 'neighbourhood concept' is defined within CS1 as its meaning is not clear.</p>		Yes, I wish to participate at the oral examination	<p>West Herts College (WHC) would like to participate at the oral part of the Examination if its proposed recommendations (as set out in these representations) are not included in the Submission version of the Core Strategy.</p> <p>WHC would like the opportunity to set out its reasoning for the</p>

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																recommendations made in its representations to ensure that the policies and vision set out in Core Strategy are considered 'sound' and that they support WHC's proposals for its Dacorum Campus.
623313	Mr John Clark	CBRE Global Investors	623314	Mr Jon Stoddart	CBRE Ltd	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		CBRE broadly supports the policy particularly the growth and rejuvenation in the Maylands Business Park.			
625412		Ivan Carter	619659	Mr David Lane	DLA Town Planning Ltd	Distribution of Development	CS1	Policy CS 1	Objecting	Yes	No		The Core Strategy is unsound because it is not justified and is not consistent with national policy.  This policy is supported on the basis that Chipperfield, as a defined Small Village, is a sustainable and accessible location for additional residential development. The allocation of the Report Site for modest residential development as promoted by this Report is done so on the basis that it would be wholly consistent with the criteria of Policy CS1.	To fully explore the issues raised in my report.	Yes, I wish to participate at the oral examination	
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners	Distribution of Development	CS1	Policy CS 1	Objecting	No	b) Effective		The settlement hierarchy proposed in Policy CS1 and Table 1 is fully supported. It is agreed that Hemel Hempstead, as the Borough's principle town, should be the main focus for new development. Recognition that the market towns of Berkhamsted and Tring, as second tier settlements, have important roles to play in meeting housing needs is also welcomed. It is however, suggested that the policy more clearly differentiates these towns from third tier larger villages. As presented in the CS,	Refer to response to question 4 above.	No, I do not wish to participate at the oral examination	

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													Table 1 could be taken to imply a degree of parity between the two; in fact the market towns are considerably more sustainable and should accommodate commensurately more growth. This should be more explicit in both Table 1 and Policy CS1.  More fundamentally, because the overall level of housing provision in the Borough (Policy CS17) is too low, when compared with ONS Figures, the ability of the market towns, particularly Tring, to fulfil their housing role has been underestimated.			
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Distribution of Development	CS 1	Policy CS 1	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  The Trustees consider that there needs to be a more explicit reference in Table 1, Settlement Hierarchy, and Policy CS1 to encouraging and facilitating mixed uses wherever possible. These will often, in practice, be the more viable of schemes, and better able to be delivered in poor economic circumstances or in times of recession. A new criterion (g) in Policy CS1 with reference to Hemel Hempstead itself would be an appropriate place for that.		No, I do not wish to participate at the oral examination	
627495	Mr Nigel Agg	TAYLOR WIMPEY UK LTD	210999	Mr Martin Friend	Vincent & Gorbings	Distribution of Development	CS1	Policy CS 1	Objecting	Yes	No		Taylor Wimpey support the strategy for the distribution of development as embraced in Policy CS1. Hemel Hempstead is clearly the most sustainable location within the Borough with a wide range of local and higher order facilities, employment and excellent access to public transport. It is clearly right that sufficient new homes to meet natural growth are provided within the town, taking into account the		Yes, I wish to participate at the oral examination	As an experienced housebuilder, Taylor Wimpey wish to appear at the examination to assist the inspector in considering the soundness of the overall development strategy, housing



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													proposed growth in employment.  Taylor Wimpey suggest a minor amendment to Policy CS1. The policy states that "Any new development should provide its own infrastructure.." For compliance with Circular 05/2005 and CIL Regulation 122, TW consider that this policy should state that any new development should "provide its own <i>necessary</i> infrastructure." Clearly, where infrastructure exists with capacity or where higher order infrastructure serves a wider area, it may be unnecessary or inappropriate to provide it within the allocation itself.			requirements and provision and the LA3 Local Allocation.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Distribution of Development	Paragraoh 28.11	Policy CS 1	Supporting	Yes	Yes		This comment relates to Paragraphs 28.7 - 28.11 and Policy 035 which addresses infrastructure and developer contributions.  Our client supports the approach identified by the Council and welcomes the recognition of the need to consider viability matters (as set out in Paragraph 28.10). It is suggested that the need for flexibility to consider viability should also be specifically set out in Policy 035 as well as the supporting text.	The wording of Policy C35 should be amended to include the comments on viability matters as set out in Paragraph 28.10.	Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
494310	Mr Elliot	Barratt Strategic	494284	Mr Elliot	Rapleys LLP	Distribution of Development	CS1	Policy CS 1	Supporting	Yes	Yes		This comment relates to Policy CS1 and Table 1: Settlement Hierarchy. The approach in both the policy and		Yes, I wish to participate	Our client is a national house builder, which has

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	Jones			Jones									<p>table is supported.</p> <p>It is considered that locating the majority of housing at Hemel Hempstead will result in the most sustainable pattern of living for the Borough. It will enable homes and jobs to be located in close proximity and will provide the population with nearby access to shops, facilities and public transport. In other words, it will help deliver balanced and sustainable growth.</p> <p>Our client also agrees with the approach identified in Policy CS1, that is, to maintain the neighbourhood pattern for new development, which is an important element of Hemel's New Town Character.</p> <p>The proposed Local Allocation at West Hemel Hempstead (LA3) will enable these objectives to be achieved. It offers an appropriate location for up to 900 homes that will be essential to meeting the housing needs of the Borough, will assist in supporting the objectives of Policy CP1, whilst also providing for the necessary supporting infrastructure requirements. However, it is noted that where existing infrastructure capacity exists, this should be utilised in the first instance.</p> <p>Policy 031 also states that the rural character of the Borough will be conserved. However, the Council recognises that some carefully sited development adjacent to Hemel Hempstead, (such as the Local Allocation at West Hemel Hempstead) will be required outside of the current settlement boundary</p>		at the oral examination	<p>vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>

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													<p>to meet the wider sustainable development objectives and development needs of the Borough.</p> <p>The approach is supported by our client, as it is considered that West Hemel Hempstead offers an appropriate location for development. It does not fall within the Chilterns AONB and will not be detrimental to the overriding purpose of the Green Belt in this locale.</p> <p>Please note that further discussions of the benefits of the Local Allocation at West Hemel Hempstead are set out in comments relative to Chapter 20.</p>			
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Distribution of Development	CS 1	Policy CS 1	Supporting	Yes	Yes		<p>This comment relates to Policy CS1 and Table 1: Settlement Hierarchy. The approach in both the policy and table is supported.</p> <p>It is considered that locating the majority of housing at Hemel Hempstead will result in the most sustainable pattern of living for the Borough. It will enable homes and jobs to be located in close proximity and will provide the population with nearby access to shops, facilities and public transport. In other words, it will help deliver balanced and sustainable growth.</p> <p>Our client also agrees with the approach identified in Policy CS1, that is, to maintain the neighbourhood pattern for new development, which is an important element of Hemel's New Town Character.</p> <p>The proposed Local Allocation at West Hemel Hempstead (LA3) will enable these objectives to be achieved. It offers an appropriate</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>

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													<p>location for up to 900 homes that will be essential to meeting the housing needs of the Borough, will assist in supporting the objectives of Policy CP1, whilst also providing for the necessary supporting infrastructure requirements. However,</p> <p>it is noted that where existing infrastructure capacity exists, this should be utilised in the first instance.</p> <p>Policy 031 also states that the rural character of the Borough will be conserved. However, the Council recognises that some carefully sited development adjacent to Hemel Hempstead, (such as the Local Allocation at West Hemel Hempstead) will be required outside of the current settlement boundary to meet the wider sustainable development objectives and development needs of the Borough.</p> <p>The approach is supported by our client, as it is considered that West Hemel Hempstead offers an appropriate location for development. It does not fall within the Chilterns AONB and will not be detrimental to the overriding purpose of the Green Belt in this locale.</p> <p>Please note that further discussions of the benefits of the Local Allocation at West Hemel Hempstead are set out in comments relative to Chapter 20.</p>			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Distribution of Development	CS1	Policy CS 1	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>The assumptions made in relation to Dacorum (DBC)'s suggested</p>	<p><b>Policy CS1: Distribution of Development</b></p> <p>Decisions on the scale and location of development will be made in accordance with the</p>	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to

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													<p>distribution of new development and the settlement hierarchy are critically flawed.</p> <p>Hemel Hempstead Focus</p> <p>DBC's settlement hierarchy is focussed on Hemel Hempstead being identified as a "Main Centre for Development and Change." This draws on the remnants of the East of England Regional Plan which was legally challenged in the High Court and as a result the substantial Green Belt extensions originally proposed around Hemel Hempstead were remitted to the Secretary of State to be treated as not approved or adopted. The principle reason being that the SEA procedure to justify this level of future development growth at Hemel Hempstead was found flawed. There is no extant regional policy, therefore, that considers future growth at Hemel Hempstead and notwithstanding this the sustainability credentials for large Green Belt extensions around the town were challenged. This is also a slightly historical debate as the Localism Bill has now been enacted at the time of writing and whilst the part of the Act requiring formal revoking of regional plans remains (as the Commencement Order is yet to be issued) it clearly shows the intent of the Government to abolish regional plans as quickly as possible.</p> <p>Further, GUI's Housing Demand and Socio-Economic Assessment, November 2011 which considers the expected natural population (and household) growth at Hemel Hempstead concludes that limited or no Green Belt land release would be required. This, coupled with the</p>	<p>settlement hierarchy in Table 1.</p> <p>Hemel Hempstead, will be the principal focus for homes, jobs and strategic services, with the emphasis upon:</p> <p>a) retaining the separate identity of the town;</p> <p>b) enhancing the vitality and attractiveness of the town centre in accordance with policy CS33;</p> <p>c) maintaining a balanced distribution of employment growth, with growth and rejuvenation in the Maylands Business Park;</p> <p>d) maintain the existing neighbourhood pattern;</p> <p>e) making best use of existing green infrastructure; and</p> <p>f) locating development a safe distance from hazardous installations.</p> <p>Any new development should:</p> <p>i. be based on the neighbourhood concept;</p> <p>ii. provide its own infrastructure; and</p> <p>iii. support relevant town-wide needs.</p> <p>Berkhamsted is an important Large Market Town (as defined in Table 1) in the borough and as such is identified as an "Area of Strategic Development Opportunity". This will allow the town to provide for new homes to meet its housing needs and demands and provide for</p>		<p>future development growth across the borough and at Berkhamsted.</p>

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													<p>fact that the sustainability credentials of substantial Green Belt land release around the town have also been challenged (as cited above), places questions around the extent of future development growth at Hemel Hempstead.</p> <p>However, it is also acknowledged that Hemel Hempstead is the largest town within the borough and should take some growth. It is for DBC to recommend on these aspects in terms of future development growth at Hemel Hempstead.</p> <p>GUI's position has and continues to be that strategic development growth at the second largest and important market town of the borough - Berkhamsted - offers the best solution in meeting the housing needs and demands of the town whilst representing strategic and complementary housing growth to Hemel Hempstead.</p> <p>The "Market Towns" and the Role of Berkhamsted</p> <p>Planning Policy Statement 1 (PPS 1) and Planning Policy Statement 3 (PPS3) encourage a sufficient quantity of housing to meet need and demand and to ensure improved choice. Both also encourage new housing development in suitable locations which offer a good range of community facilities with good access to jobs, key services and infrastructure. The Official Draft National Planning Policy Framework (NPPF) echoes the same issues, in particular the importance of housing demand being met at the right market locations whilst actively</p>	<p>employment and enhanced town centre and local facilities, services and retail provision. A Housing Allocation has been identified to the south of the town (the extent of the land is defined by a red line boundary identified on the Vision Diagram for Berkhamsted and Concept Plan) which will assist in meeting the housing demands of the town whilst also assisting in meeting the Council's overall vision and local objectives of the town itself.</p> <p>The market towns and Tring as a Small Market Town and Large villages (as defined in Table 1) will accommodate new development for housing, employment and other uses, provided that it:</p> <p>a) is of a scale commensurate with the size of the settlement and the range of local services and facilities;</p> <p>b) helps maintain the vitality and viability of the settlement and the surrounding countryside;</p> <p>c) causes no damage to the existing character of the settlement or its adjoining countryside; and</p> <p>d) is compatible with policies protecting the Green Belt and Rural Area.</p> <p>The rural character of the borough will be conserved. Development that supports the vitality and viability of local communities causes no damage to existing character of a village and/or surrounding area and is compatible with policies protecting and enhancing</p>		

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													<p>encouraging new development which brings forward new homes and delivers new and improved infrastructure.</p> <p>Turning to DBC's suggested settlement hierarchy as reflected within draft CS Policy CS1 concerning Distribution of Development, the following points are made.</p> <p>The definition of Hemel Hempstead as a "Main Centre for Development Change" has already been questioned, as per the above comments.</p> <p>In relation to the definition of "Market Towns", Tring should not be considered within the same category as Berkhamsted under the Council's draft settlement hierarchy, as identified in draft Table 1 (page 54) of the consultation document. It should be defined as a "Small Market Town" as reflected in GUI's suggested re-wording of Table 1 (below) supporting draft Policy CS1.</p> <p>Berkhamsted and Tring are not one and the same in terms of their categorisation. There are very distinctive differences in terms of the size of the existing population together with the level of local facilities, services and retail provision within each and their potential to expand in meeting local housing and development demands and needs.</p> <p>Berkhamsted has an estimated population of 23,747 (ONS 2008, published 2010) and is second largest (in household population) within Dacorum's draft settlement hierarchy following Hemel Hempstead. Tring on the other hand</p>	the Green Belt area and Chilterns Area of Outstanding Natural Beauty will be supported.		

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													<p>is a significantly smaller settlement in population size (15,974, ONS 2008, published 2010) and contains a limited number of facilities and retail provision when compared to Berkhamsted. They are both very different in character and function and how they contribute economically to the borough. In terms of market demand it is evident that the demand for new homes is much greater at Berkhamsted as a larger market town, which is well connected (by rail and road) and within commutable distance to London. Planned housing growth should always be directed to the right market locations.</p> <p>Historically, DBC as an Authority have recognised this. Adopted Policy 2 of Dacorum's Local Plan (adopted 2004) states that "development will generally be directed to the towns of Berkhamsted, Hemel Hempstead and Tring." The supporting text identifies that "Hemel Hempstead will take the largest share of development for housing and employment purposes. Opportunities for development at Berkhamsted (including the urban area of Northchurch Parish) are more limited. Tring is the smallest town and the most constrained. Very limited opportunities are likely in Tring." This acknowledges that Tring, as a smaller market town, has a very different current and future role from Berkhamsted as a larger market town (although the reference to Berkhamsted's more limited development opportunity is not agreed with, in principle, and dealt with below).</p> <p>In addition, the Emerging Core Strategy published in June 2009 acknowledges that Berkhamsted is</p>			



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													<p>the "second highest ranking settlement" within the Borough that "would normally accommodate a significant share of growth relative to Tring and the other large villages." The Pre-Submission CS identifies Berkhamsted as the "second largest settlement in the borough" at draft paragraph 21.1.</p> <p>Further, DBC's Emerging Core Strategy (June 2009) identified the overall vision of Berkhamsted in creating a "vibrant market town" as "an important town" to the borough. The CS Plan recognises that "no town can sustain itself unless there is investment and it can adapt and grow."</p> <p>The Authority themselves therefore appear confused on what the future role of Berkhamsted should be and have been inconsistent in their approach. This is most likely due to political pressures not to expand a market town where a local community would not support it but where such expansion is a real necessity now to meet future generation's needs in order to sustain the future status and function of Berkhamsted.</p> <p>GUI's Housing and Socio-Economic Assessment, November 2011, is conclusive that there is a critical need to expand Berkhamsted to meet future housing demands. Based on the latest population and household projections (ONS 2008), Berkhamsted has a future housing requirement of some additional 2,871 new homes (to 2031). This is significantly beyond the level DBC have planned for the town. The actual growth levels for the town also need to be acknowledged in the ranking of Berkhamsted within</p>			

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													<p>the settlement hierarchy.</p> <p>On the above basis, Draft Policy CS1 of the draft Pre-Submission Core Strategy needs to identify Berkhamsted as a Large market Town of an "Area of Strategic Development Opportunity".</p> <p>Future development growth should be directed where it can be sustained by existing and potentially new social and transportation infrastructure.</p> <p>Berkhamsted offers this opportunity and should be fully recognised in this respect alongside meeting local housing needs where there is a clear demand. Its role, character and function should therefore be enhanced. This approach would be consistent with the Pre-Submission Core Strategy in terms of achieving economic sustainability by investing for new homes (and businesses).</p> <p>Strengthening the role of Berkhamsted, as an important market town, would represent good planning in creating sustainable development which complements growth at Hemel Hempstead whilst also enhancing the unique aspects of the town itself. Its enhanced status would also identify opportunities for creating existing and new communities with a sense of place and identity. In addition, this approach would locate future growth where it could enhance opportunities for national and regional linkages particularly in terms of housing and economic growth within this important</p> <p>London Commuter Belt sub-region alongside future development growth identified at Hemel</p>			

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													<p>Hempstead. This approach also meets many of the strategic and local objectives of the Pre-Submission CS (which are explored in further detail within GUI's Planning Document which forms part of this evidence base).</p> <p>On the above basis, the objective to "maintain the vitality and viability of the settlement" is supported, however, Berkhamsted cannot be defined within the same category as Tring (as a much smaller market town) and the Large Villages within the borough in terms of accommodating future development growth.</p> <p>It is important that the large market town expands to meet its future housing needs and demands. GUI have created a solution for meeting this housing demand in identifying Land South of Berkhamsted as a Housing Allocation in the form of a sustainable and deliverable urban extension to the southern edge of the town. The Proposals are described in detail within GUI's Planning Document forming part of this evidence base and within GUI's response to policies and allocations contained within the Berkhamsted Chapter of the CS.</p> <p>Conclusions on soundness of draft Policy CS1: Distribution of Development</p> <p>Draft policy CS1 is not justified because the evidence on which the settlement hierarchy is based is not considered robust or credible. The current identification of Berkhamsted, Tring and Large strategy when considered against the reasonable alternatives.</p>			

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													<p>Draft policy CS1 is not effective as it would not deliver the quantum or distribution of housing needed in the Borough to meet natural population and household growth.</p> <p>Draft policy CS1 is not consistent with national policy because it does not represent a basis for deciding where the planned location of new housing is distributed.</p> <p>It is strongly recommended, therefore, that CS policy recognises Berkhamsted as an important market town which could accommodate sustainable, strategic development growth complementary to the future role of Hemel Hempstead.</p> <p>Berkhamsted should not therefore be defined as an "Area of Limited Opportunity" but instead under the definition as an "Area of Strategic Development Opportunity." Draft CS1 should be amended as such to reflect this position to ensure it is sound and in accordance with PPS1, PPS3, PPS12 and the official Draft NPPF.</p> <p>On the above basis, it is also recommended that (1) Table 1 of the CS is amended (as recommended below); (2) Map 1, the Key Diagram is amended (as recommended below).</p> <p>It is also recommended that (1) "Dacorum 2031: A Vision" (paragraph 5.1; at page 33) of the Pre-Submission CS (2) the strategic objectives (at paragraph 6.2 of the CS) and (3) strategic objectives as set out at page 51 of the draft CS - are all amended to acknowledge that Berkhamsted is an important market town and an "Area of</p>			

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													Strategic Development Opportunity" in accommodating new strategic development in the form of a sustainable, urban extension to the south of the town.			
501874		E.J. Hillier Will Trust	398719	Ms Jo Emmett	Hives Planning	Distribution of Development	CS 1	Policy CS 1	Objecting	Yes	No	a) Justified	<p>That Hemel Hempstead should be the principal focus for development is supported, as it is the most sustainable settlement in the Borough. However it is considered that the Core Strategy plans for insufficient development - as a proportion of the total - in the market towns and large villages (notwithstanding that the total level of development is also considered to be</p> <p>Insufficient - see representations to Policy CS17).</p> <p>It is confusing for Policy CS1 to group both the market towns and larger villages under 'Areas of Limited Opportunity' as it is not clear how their separate categorisation influences the strategy for development within these settlements. This is compounded by Table 1, which shares the explanatory text for the two categories. Notwithstanding this, the general approach</p> <p>set out in Table 1 is not considered sound as it states that in Areas of Limited Opportunity development will be supported "that enables the population to remain stable". This approach is not sustainable. Instead these settlements should provide for an element of growth to support local community needs, especially given that in all other areas of the Borough (aside from Hemel Hempstead) there will be a policy of "development restraint". This needs to be reflected in the housing numbers for the market towns and</p>	<p>Amend Policy CS1 to read: "The market towns and larger villages will accommodate new development for housing employment and other uses, that: i) is of a scale commensurate with the size of the settlement and the range of local services and facilities, and its role in providing for the housing, employment and other needs of it and the surrounding settlements it serves".</p> <p>Land at Grange Farm, Bovingdon should be identified as a local allocation. The allocation should include greater total housing provision (and should include affordable housing and housing for the elderly), plus open space and allotments.</p>	Yes, I wish to participate at the oral examination	To enable a full discussion of the issues raised and assist the Inspector in responding to these, as appropriate.

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													<p>larger villages, which should at least accommodate 'natural population growth' (again, see representations to Policy CS17).</p> <p>Table 1 notes that the larger settlements have a role in providing for both their own residents and those of adjacent rural communities, yet this is not reflected in the overall level of housing provision set out in Policy CS17. The Core Strategy as drafted is therefore inconsistent and Policy CS1 does not represent the most appropriate strategy when considered against the reasonable alternatives (i.e. is unsound under the terms of PPS12).</p> <p>It is considered that a higher level of development can appropriately be accommodated in the market villages and larger towns, given their sustainability credentials. For example at Bovingdon, land at Grange Farm could appropriately provide for the current proposed level of growth for the village, but also additional needs of the rural communities that the village serves.</p> <p>The Vision for Bovingdon sets out that over the plan period new development in the village will have secured a high level of affordable housing and new open space. Paragraph 24.2 also references provision of 60 new homes on the edge of the village, a residential care home for the elderly and allotments in the village. The local allocation, termed Proposal LA6, is how the Council envisages delivering this vision for Bovingdon; however this is not the most appropriate strategy when considered against the reasonable</p>			

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													alternatives (i.e. other sites in the village) - and is therefore not 'sound'.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.14	8.14	Objecting	Yes	No	a) Justified	While BRAG agrees that the effective use of existing land should be optimised it does not support extensions to settlement boundaries that would impact on the Green Belt. Given that there are sites with the benefit of planning permission which have yet to even commence construction in Berkhamsted, e.g. New Lodge, and the severity of the current economic downturn, care has to be taken not to over-allocate sites for new housing. Core strategies approved when the danger signs of the recession were ignored e.g. that of Dover District Council, have resulted in high grade agricultural land taken out of agricultural use (contrary to PPS7 and the Draft NPPF), idle building sites, and general planning blight.		Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
488516	Mr Hugh siegle					Paragraph	8.14	8.14	Objecting		No	a) Justified	In considering possible locations for the extension of settlements if required Green Belt land should not be included	In considering suitably located extensions to settlements Green Belt land should be excluded	No, I do not wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 8.14	8.14	Supporting	Yes	Yes		Nonetheless consideration should be given to provision of additional employment opportunities in other settlements to address the changing nature of employment, lessen the attraction or obligation to commute long distances, and reduce reliance on cars/buses/trains to access employment.		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
610618	Miss Lindsey Coates	The Mount Residents Association				Selection of Development Sites	Policy CS2; (para8.16, p.57)	Policy CS 2	Objecting	Yes	No	b) Effective	Priority A - within defined settlements - has no consideration of the value of the land. Simply because land is in a 'defined settlement' does not automatically mean it has no value and that 'other land' can not be found to be a better place to build. A note should be	A note should be included that indicates that there should be some flexibility based on site specific information that could mean that priority A may give way to priority B, when there are a range of factors indicating that development would be better	No, I do not wish to participate at the oral examination	

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													included that indicates that there should be some flexibility based on site specific information that could mean that priority 'A' may give way to priority 'B', when there are a range of factors indicating that development would be better suited to an extension of a defined settlement (e.g. less biodiversity will be lost as a result of developing on (priority B land) an extension to a defined settlement). Simply because land is defined as 'green belt' doesn't mean it will always be of greater value to nature and wildlife than other land that is found in defined settlements. Each piece of land should be judged on its individual merits.  This flexibility will likely be permitted by new planning regulations in the near future.	suited to an extension of a defined settlement.		
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Selection of Development Sites	POLICY CS 2	Policy CS 2	Objecting	Yes	No	b) Effective	While BRAG agrees with the majority of POLICY CS2, point (c) should be strengthened by adding "without compromising Government policy on Green Belt and protecting Green Belt for future generations."	The wording for (c) should be : ensure the most effective use of land without compromising Government policy on Green Belt and protecting Green Belt for future generations	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
488516	mr hugh siegle					Selection of Development Sites	CS 2	Policy CS 2	Supporting	Yes	Yes	a) Justified	I support conditional on Green Belt land being excluded in line with Borough and National Policy	In Section B, sub-section b) add the words " and the policy of not building on Green Belt"	No, I do not wish to participate at the oral examination	
211055	Mr Matthew Wood	Hertfordshire County Council				Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes		The fact that the PSCS identifies that amongst the considerations to bringing forward housing sites will be an assessment of potential benefits/opportunities. This approach is supported since there may be instances where the delivery of housing may also facilitate the delivery of additional infrastructure capable of relieving		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination



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													pressure on the existing urban area.			in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
211503	Mr Colin White	Chilterns Conservation Board				Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes		A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.  Section 87 of the CRoW Act sets out the purposes of a conservation board as:  a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and  b) the purpose of increasing the		No, I do not wish to participate at the oral examination	

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													<p>understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation</p>			

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													<p>Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The Policy is supported as drafted.</p>			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Selection of Development Sites	CS2	Policy CS 2	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>Draft policies CS2, CS3 and CS4 regarding the selection and management of development sites are not considered sound because they do not sufficiently acknowledge the requirement to address local housing needs based on forecasted natural population and household growth. GUI acknowledges that draft Policy CS2 (B) identifies a series of sustainability credentials to be met and which are considered a reasonable approach for considering extensions to defined settlements more generally.</p> <p>PPS3 states that Local Planning Authorities should deliver "a sufficient quantity of housing taking into account need and demand and seeking to improve choice." Annex C of PPS3 adds that Strategic Housing Market Assessments (SHMAs) should "determine how the distribution of need and demand varies across the plan area", consider " demographic trends, and identify the accommodation</p>	<p>For the reasons set out above, the following additions (indicated in bold and deleted in strikethrough) are considered necessary in order to make the Core Strategy sound:</p> <p><b>Policy CS2: Selection of Sites</b></p> <p>Development Sites will be chosen in accordance with the following sequence and priorities:</p> <p>.....</p> <p>B: Extensions to defined settlements (i.e. local allocations, see Policy CS3)</p> <p>The development of any of these sites must:</p> <p>(a) allow good transport connections (see Policy CS8);</p> <p>(b) have full regard to environmental assets, constraints and opportunities;</p> <p>(c) Ensure the most effective use of land <b>which will contribute towards local housing and socio-economic needs and demands, responsive to local</b></p>	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.

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													<p><i>requirements of specific groups</i>". The DCLG Practice Guide 3[1&amp;2] sets out the requirement for analysis of past and current housing market trends, including balance between supply and demand in different housing sectors in addition to consideration of future household estimations.</p> <p>The overall thrust of current Government policy as set out in the National Planning Policy Framework (NPPF) is meeting local housing demand and delivering new homes at the right market locations. It states that LPAs should identify a scale and mix of housing that the local population is likely to require over the plan period and specifically states that planned growth should "meet household and population projections, taking account of migration and demographic change".</p> <p>It is therefore essential that DBC's housing target for the plan period is justified by a robust evidence base that takes into consideration existing and projected population and household growth within the CS Plan Period (to 2031). The Pre-Submission CS consultation document recognises this requirement. It states that the borough's towns cannot sustain themselves unless there is investment and they are allowed to adapt and grow[3], and meet their local housing needs[4]. The consultation document also acknowledges that the choice of housing target has considered " <i>the amount needed to meet forecast household growth in the borough</i>"[5]. However, this is not reflected in draft policy CS2 regarding the</p>	<p><b>population and household growth of that settlement ;</b></p> <p>(d) respect the local character and landscape context;</p> <p>(e) accord with the approach to urban structure (see Policy CS4); and</p> <p>(f) comply with Policy CS35 regarding infrastructure delivery and phasing.</p>		

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													<p>selection of development sites.</p> <p>It is considered that draft policy CS3 (which is linked to draft policy CS2) is unsound as it is not consistent with national policy. As identified above, PPS3 and the NPPF emphasise the need for Local Authorities to demonstrate an adequate supply and range of housing opportunities. To secure certainty for developers and investors there should be a clearly defined and sufficiently robust supply of land identified up front to meet housing needs. Greenfield allocations should therefore not be "<i>held in reserve until needed</i>", particularly given the current pressing need for new housing to meet current and expected housing demands within the Plan period.</p> <p>Certain Green Belt, greenfield sites may well be appropriate for earlier release in terms of their wider objectives. To hold these in reserve will simply sterilise housing delivery. This approach also fails to acknowledge phasing and market flexibility associated with delivering a sustainable, phased urban extension. Phasing the delivery of new development is also very much dependent on viability which has not been acknowledged in draft policy CS3. CS Policy cannot control these phasing matters where site-specific housing and infrastructure trajectories for each new development scheme at the detailed planning and development stages, will only be able to be determined.</p> <p>These Greenfield Allocations for housing should also be reflected in Policy CS4 which addresses development within the towns and large villages. This is particularly</p>			

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													<p>important at Hemel Hempstead and Berkhamsted, the Borough's two large towns.</p> <p><b><u>Conclusions on soundness of draft Policies CS2, CS3 and CS4</u></b></p> <p>Draft policies CS2 and CS3 are not considered to be justified because they do not sufficiently acknowledge the requirement to meet local housing needs and demands based on forecasted natural population and household growth within the plan period.</p> <p>Draft policies CS2 and CS3 are not effective because these policies would not deliver the quantum or distribution of housing needed in the borough and at the right market locations.</p> <p>Draft policy CS3 is not consistent with national planning policy because it does not assist in demonstrating an adequate land supply for housing in the early phases of the Core Strategy plan period.</p> <p>Draft Policy CS4 is not effective or consistent with national policy because it fails to recognise the role of Greenfield Housing Allocations in accommodating housing growth to meet local demand (as examined in the above response to draft Policies CS2 and CS3).</p> <p>Footnotes:</p> <p>1 DCLG. May 2007. Housing Market Information Advice Note.</p> <p>2 DCLG. August 2007. Strategic Housing Market Assessments Practical Guide.</p>			

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													<p>3 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 8.7.</p> <p>4 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 1.13.</p> <p>5 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 14.16.</p>			
498429	Steve Baker	CPRE - The Hertfordshire Society				Selection of Development Sites	CS2	Policy CS 2	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>We object to the Local Allocations that relate to sites in the Green Belt as we do not consider that they are required during the period covered by the Core Strategy, and that their allocation would be contrary to national Green Belt policy that requires exceptional circumstances to be demonstrated for the allocation of Green Belt land for development.</p>	Policy CS2 should be amended to state that no site within the Green Belt will be allocated unless and until it is demonstrated that there is no alternative to enable achievement of the Core Strategy housing provision.	Yes, I wish to participate at the oral examination	To ensure that the Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd	Selection of Development Sites	Policy CS2	Policy CS 2	Supporting	Yes	Yes		<p>We support the broad approach towards the selection of development sites within the Borough (as set out in Policy CS2). In particular, we welcome the preference for developing 'previously developed land' in advance of new development on greenfield/countryside sites.</p> <p>The current Masterplan/development proposals for the Hicks Road Industrial Estate in Markyate demonstrate how the recycling of previously developed land (within the settlement boundary) can successfully meet future growth requirements/housing need.</p>		Yes, I wish to participate at the oral examination	Our client (Zog Brownfield Ventures Ltd) is a significant land holder within the Borough and is currently pursuing the redevelopment of the Hicks Road Industrial Estate (identified as Strategic Site SS2 in the Pre-Submission Core Strategy).
619662	Mr	Unknown	619659	Mr	DLA Town Planning	Selection of Development	CS2	Policy CS 2	Supporting	Yes	Yes				No, I do not wish to	

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	Euan Macdonald			David Lane	Ltd	Sites									participate at the oral examination	
619662	Mr Euan Macdonald	Unknown	619659	Mr David Lane	DLA Town Planning Ltd	Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes				No, I do not wish to participate at the oral examination	
619677		Blackjack Investments Ltd	398614	Mr Mark Flood	Insight Town Planning	Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes		<p>Our client supports criteria (a) to (f) set out within the policy, which provide the basis for identifying extensions to defined settlements, including Tring. The sensitive development of part of our clients land to provide 150 dwellings would have clear potential to comply with these criteria.</p> <p>However, in our clients view this is far as the CS should go in laying the foundations for urban extension of Tring. Our client does not agree that the CS should include local allocations, and we turn to this further below. Reference to the "local allocations" within criterion B should therefore be omitted.</p> <p>We also note that Policy CS2 effectively applies a sequential test to development, as follows:-</p> <ol style="list-style-type: none"> <li>1. Previously developed land within settlements</li> <li>2. Areas of high accessibility within settlements</li> <li>3. Other land within settlements and then</li> <li>4. Extensions to defined</li> </ol>		Yes, I wish to participate at the oral examination	



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													settlements.  This approach does not reflect PPS3. Whilst paragraph 36 of PPS3 maintains that previously developed land should be a priority for housing development, a sequential approach has long since disappeared from Government policy. At the recent Harborough District Core Strategy EIP, the Planning Authority accepted that a similar approach to Dacorum was not appropriate and the sequential element of its equivalent policy was omitted during the course of the EIP.			
211660	Mr Garrick Stevens	Berkhamsted Town Council				Selection of Development Sites	CS 2	Policy CS 2	Supporting	Yes	Yes		P 57 Policy CS2 Selection of Development Sites Support		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
494131	Mr Michael Emmett	CALA Homes				Selection of Development Sites	CS2	Policy CS 2	Objecting	Yes	No	a) Justified	It is unsound because it is not Justified, Effective or Consistent with national policy.  It is considered that the sequencing and prioritisation of sites proposed in Policy CS2 is inappropriate and unnecessary given the level of need for housing, the general under-provision proposed by the Core Strategy relative to that need and the limited number of local allocations proposed. In the light of the provisions of the draft NPPF, it is considered that to the extent that any prioritisation can be justified, emphasis should be placed less on brownfield land and more on meeting needs and stimulating economic growth. Accordingly it is suggested that the sequencing of sites should be limited, if at all, to instances where more than one greenfield site is proposed in any	Delete the first sentence of Policy CS2 and replace with:  "Development sites will be chosen having regard to the following criteria:"	Yes, I wish to participate at the oral examination	CALA Homes has a controlling interest in the Icknield Way Tring Local Allocation and as such has an important role to play in delivering a key element of the Core Strategy.

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													one settlement. The policy would then only be applicable to the allocations in Hemel Hempstead.			
494847		Trustees of Drayton Beauchamp Parochial Charities	626780		Cole Flatt & Partners	Selection of Development Sites	CS2	Policy CS 2	Objecting	No	a) Justified		<p>The sequencing and prioritisation of sites proposed in Policy CS2 is inappropriate and unnecessary given the level of need for housing. The general under-provision proposed by the CS relative to that need and the limited number of local allocations proposed.</p> <p>In light of the provisions of the draft NPPF, it is considered that to the extent that any prioritisation can be justified, emphasis should be placed less on brown field land and more on meeting needs and stimulating economic growth. It is suggested that the sequencing of sites should be limited, if at all, to instances where more than one greenfield site is proposed in any one settlement. The policy would then be only applicable to the allocations in Hemel Hempstead.</p>	Refer to response to question 4 above.	No, I do not wish to participate at the oral examination	
498273	Mr Alan Barker		619659	Mr David Lane	DLA Town Planning Ltd	Selection of Development Sites	CS2	Policy CS 2	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified and is not consistent with national policy.</p> <p>CS2: with regard to priority B extensions to Defined Settlements specified by this Policy, it is considered that the criteria should explicitly allow for the limited outward expansion of settlements where this will provide a more defensible and rational Green Belt boundary to that settlement.</p>		Yes, I wish to participate at the oral examination	To explore the issues raised in my report.
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes		USS welcomes the approach of Policy CS2 which seeks to adopt a sequential approach when considering development sites, starting with the use of previously developed land and buildings within			

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													defined settlements.			
515465	Mr Alan Kemp	Berkhamsted Town Council				Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes				Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.
620224	Mr Stephen Harris	Emery Planning Partnership				Selection of Development Sites	CS2	Policy CS 2	Objecting	No	No	c) Consistent with national policy	<p>Policies CS2 and CS3 set out the policy for the selection and management of development sites. The pre-submission Core Strategy relies on a number of local allocations in the Green Belt in order to meet the housing requirement set out in policy CS17.</p> <p>From the Council's own assessment it is clear that any concerns on Waterside Way can be addressed and the site should be included in the Core Strategy either in place of the land to the west or in addition to. The housing need would justify the allocation of one or more sites in Tring.</p> <p>Summary - see full planning statement submitted for a comparison of the two locations referred to).</p>		Yes, I wish to participate at the oral examination	Please see attached
625293		BIDWELLS				Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes		<p>Our client supports the general principle of development within the West Hemel Hempstead location and development strategy for growth within the Borough (Policy CS1).</p> <p>With specific regard to development West of Hemel Hempstead:</p> <p>CS2, sub-paragraph (b) refers to settlement extensions and local allocations. West Hemel Hempstead is identified as Local Allocation LA3.</p>			

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625652		Berkhamsted School	625654	Mr Peter Dines	Gerald Eve LLP	Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	Yes		<p>Whilst concern is expressed regarding the lack of strategic sites proposed for new housing, it is considered that the framework for urban extensions provided by draft policies CS2 and CS3, in conjunction with draft Policy CS5, set an appropriate policy context for the forthcoming Site Allocations DPD to identify sites in the Green Belt that are suitable and capable of coming forward for future development.</p> <p>Draft Policy CS5, together with draft policies CS2 and CS3, sets out a strategic approach to allow limited urban extensions through small-scale Green Belt boundary changes in accordance with National Planning Policy. It is also considered to be 'justified' given the uncertainty at this stage as the ability of settlements including Berkhamsted to accommodate their associated housing requirement within their existing boundaries. The policy approach is also considered effective, by being sufficiently flexible in setting the broad parameters for the Site Allocations DPD to identify sites to come forward to deliver new housing.</p>	No change sought.	No, I do not wish to participate at the oral examination	
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners	Selection of Development Sites	CS2	Policy CS 2	Objecting	No	a) Justified		<p>Management of development (policy CS2)</p> <p>The sequencing and prioritisation of sites proposed in Policy CS2 is inappropriate and unnecessary given the level of need for housing. The general under-provision proposed by the CS relative to that need and the limited number of local allocations proposed.</p> <p>In light of the provisions of the draft NPPF, it is considered that to the extent that any prioritisation can be justified, emphasis should be places</p>	Refer to response to question 4 above	No, I do not wish to participate at the oral examination	

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													less on brownfield land and more on meeting needs and stimulating economic growth. It is suggested that the sequencing of site should be limited, if at all, to instances where more than one Greenfield site is proposed in any one settlement. The policy would then be only applicable to the allocations in Hemel Hempstead.			
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Selection of Development Sites	CS2	Policy CS 2	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective, Consistent with national policy.</p> <p>Policy CS2 should also encourage positively mixed use schemes. Policy CS4, where a specific reference is made to General Employment Areas, should also advise that employment generating developments in GEA's can also include mixed uses and that these will also be encouraged. Reference is made to mixed uses as being supported elsewhere in the above Policy, but only 'where it does not conflict with other policies'.</p> <p>This is too broad a statement and it is almost impossible to show in most mixed use schemes how every other policy in the Core Strategy can be adhered to in full.</p> <p>It would be far better to accept that mixed use schemes will not always be able to meet every other policy in the Core Strategy, but are to be welcomed in a more unqualified way, as enhancing the quality and character of areas, and ensuring the delivery of say much needed housing or cultural facilities, as well as employment space, and to deal with each proposal on its merits.</p>		No, I do not wish to participate at the oral examination	
627495	Mr Nigel	TAYLOR WIMPEY UK LTD	210999	Mr Martin	Vincent & Gorbing	Selection of Development Sites	CS 2	Policy CS 2	Supporting	Yes	Yes		Taylor Wimpey support the approach to the selection and management of development sites		Yes, I wish to participate	As an experienced housebuilder,

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	Agg			Friend									set out in Policies CS2 and CS3.  It is accepted that as a general approach, previously developed land should be prioritised over other potential land, as embraced in Policy CS2. However, it is also considered that in order to ensure flexibility and deliverability within the plan period, other factors need to be considered in determining the exact timing of the release of local allocations. Policy CS3 takes this approach and it is welcomed. Once identified there are clearly a number of factors which could result in the local allocations being brought forward. As set out in Policy CS3, this could relate to housing need in general (whether in numerical terms or in terms of the need for a type or tenure of housing) as well as the impact and provision of infrastructure in the settlement.		at the oral examination	Taylor Wimpey wish to appear at the examination to assist the inspector in considering the soundness of the overall development strategy, housing requirements and provision and the LA3 Local Allocation.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Selection of Development Sites	CS 2	Policy CS 2	Supporting	Yes	Yes		Policy CS2 identifies a sequential approach to the identification of development sites. This is to guide the approach to be taken forward in the accompanying Site Allocations Development Plan Document (DPD).  Our client considers this general method to housing land supply is justified in the interests of achieving the most sustainable development approach and welcomes the flexibility provided by the identification of the extensions to defined settlements (that is, the Local Allocations).  It is also their view that the criteria set out within the policy is appropriate and will provide for suitable and viable developments that will meet the wider objectives of the plan.		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the

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																Examination in Public.
627374		Brightman & Ball	627371	Mr Andrew Wilkins	Lone Start Land Ltd	Selection of Development Sites	CS2	Policy CS 2	Supporting	Yes	No	a) Justified	<p>The core strategy is unsound because it is not justified and is not effective.</p> <p>Please refer to the accompanying Planning Statement for full response.</p> <p>In summary, our clients fully support the principle of a joint development of the Hanburys and The Old Orchard site local allocation site and overall support the Core Strategy. However, objection is raised to Policy CS3 Managing Selected Development Sites in its current form as it is neither 'justified' nor 'effective' and as such is unsound. The site Hanburys and The Old Orchard already meets the key relevant tests under Policy CS3 and should therefore be given greater certainty regarding delivery. The delivery of the site would assist the housing targets of the Core Strategy and is essential to achieving the objectives of the Berkhamsted Place Strategy and therefore the strategic objectives of the Core Strategy. The site is available now and deliverable within the short term. The early release of the site will bring benefits to the settlement; address local housing needs and is well served by existing and planned infrastructure.</p>	Further delivery details should be added to the site proposal LA5 to refer to development being programmed in order to enable the completion of the Shootersway/Kingshill Way junction improvements in advance of, or alongside, Strategic Site Proposal SS2 or the site should be re-categorised as an additional strategic site proposal for Berkhamsted.	Yes, I wish to participate at the oral examination	Local Allocation Proposal LA4 is a fundamental component of the Core Strategy. There should be professional representation in its respect at the Examination where there will be the opportunity to provide further evidence if necessary.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective or consistent with national policy.</p> <p>Page 57 - Policy CS3: There is no justification for a policy restricting the release of identified sites especially given the inadequate provision of housing and Policy CS3 should preferably be deleted, or at</p>	Page 57 - Policy CS3: There is no justification for a policy restricting the release of identified sites and Policy CS3 should preferably be deleted, or at the very least amended.	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms

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													the very least amended to allow for the easier release of housing sites.			of housing provision which is fundamental to the Plan as a whole. Also the merits of the Nash Mills site and the relative merits of other boundary changes or allocated sites will need to be examined orally.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective or Consistent with national policy.  Page 57 - Policy CS3: There is no justification for a policy restricting the release of identified sites especially given the inadequate provision of housing and Policy CS3 should preferably be deleted, or at the very least amended to allow for the easier release of housing sites.	Page 57 - Policy CS3: There is no justification for a policy restricting the release of identified sites and Policy CS3 should preferably be deleted, or at the very least amended.	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms of housing provision which is fundamental to the Plan as a whole. Also the merits of the Nash Mills site and the relative merits of other boundary changes or allocated sites will need to be examined orally.
211055	Mr Matthew Wood	Hertfordshire County Council				Managing Selected Development Sites	CS3	Policy CS 3	Supporting	Yes	Yes		The criteria based approach to considering the bringing forward of development sites is supported.  Criteria a, b and c link making sites available for development with availability of infrastructure, the relative needs of the settlement and the benefits the particular development would bring to a settlement . This approach positively recognises and		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector



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													<p>acknowledges the contribution that could be made by 'new' sites to providing new infrastructure, (ie schools), and the fact that those sites may assist in relieving pressure being generated within the existing urban area.</p> <p>The holistic approach to considering the role that a new development site might make is manifest demonstration of the fact that the Local Planning Authority is seeking to ensure that need for and delivery of, new infrastructure is programmed into identifying the appropriate release of sites.</p>			<p>understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.</p>
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Woolf Bond Planning	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	No	No		We object to this policy on the basis that the local allocations have been assessed as entirely appropriate for development over the plan period and should be brought forward as and when market demands allow, to meet identified market and affordable housing needs within the Borough.		No, I do not wish to participate at the oral examination	
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Woolf Bond Planning	Managing Selected Development Sites	CS19	Policy CS 3	Supporting	Yes	Yes		We support the provision of affordable housing in association with new housing development to help meet the needs of the local area. The Durrants Lane/Shootersway site offers an opportunity to provide a material amount of affordable housing in a sustainable location. However, it is considered that the amount of affordable housing to be provided		No, I do not wish to participate at the oral examination	

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													as part of any new development should be determined on a site-by-site basis, having regard to site-specific circumstances.			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>Draft policies CS2, CS3 and CS4 regarding the selection and management of development sites are not considered sound because they do not sufficiently acknowledge the requirement to address local housing needs based on forecasted natural population and household growth. GUI acknowledges that draft Policy CS2 (B) identifies a series of sustainability credentials to be met and which are considered a reasonable approach for considering extensions to defined settlements more generally.</p> <p>PPS3 states that Local Planning Authorities should deliver "a sufficient quantity of housing taking into account need and demand and seeking to improve choice." Annex C of PPS3 adds that Strategic Housing Market Assessments (SHMAs) should "determine how the distribution of need and demand varies across the plan area", consider " <i>demographic trends, and identify the accommodation requirements of specific groups</i> ". The DCLG Practice Guide 3[1&amp;2] sets out the requirement for analysis of past and current housing market trends, including balance between supply and demand in different housing sectors in addition to consideration of future household estimations.</p> <p>The overall thrust of current Government policy as set out in the National Planning Policy Framework</p>	<p>For the reasons set out above, the following additions (indicated in bold and deleted in strikethrough) are considered necessary in order to make the Core Strategy sound:</p> <p><b>Policy CS3: Managing Selected Development Sites</b></p> <p><b>Remove sentence:</b> "Local Allocations will be held in reserve and managed as countryside until needed".</p> <p><b>The release of Housing Allocations</b> for development will be guided by:</p> <p>(a) the availability of infrastructure in the settlement;</p> <p>(b) the relative need <b>and demand</b> for development at that settlement <b>based on a robust examination of natural population and household growth</b>;</p> <p>(c) the benefits it would bring to the settlement <b>to include new and improved transportation and social infrastructure provision</b>;</p> <p><b>Remove sentence:</b> "(d) the intended release date set out in the Site Allocations DPD".</p>	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.

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													<p>(NPPF) is meeting local housing demand and delivering new homes at the right market locations. It states that LPAs should identify a scale and mix of housing that the local population is likely to require over the plan period and specifically states that planned growth should "meet household and population projections, taking account of migration and demographic change".</p> <p>It is therefore essential that DBC's housing target for the plan period is justified by a robust evidence base that takes into consideration existing and projected population and household growth within the CS Plan Period (to 2031). The Pre-Submission CS consultation document recognises this requirement. It states that the borough's towns cannot sustain themselves unless there is investment and they are allowed to adapt and grow[3], and meet their local housing needs[4]. The consultation document also acknowledges that the choice of housing target has considered " <i>the amount needed to meet forecast household growth in the borough</i> "[5]. However, this is not reflected in draft policy CS2 regarding the selection of development sites.</p> <p>It is considered that draft policy CS3 (which is linked to draft policy CS2) is unsound as it is not consistent with national policy. As identified above, PPS3 and the NPPF emphasise the need for Local Authorities to demonstrate an adequate supply and range of housing opportunities. To secure certainty for developers and investors there should be a clearly defined and sufficiently robust supply of land identified up front to</p>			

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													<p>meet housing needs. Greenfield allocations should therefore not be "held in reserve until needed", particularly given the current pressing need for new housing to meet current and expected housing demands within the Plan period.</p> <p>Certain Green Belt, greenfield sites may well be appropriate for earlier release in terms of their wider objectives. To hold these in reserve will simply sterilise housing delivery. This approach also fails to acknowledge phasing and market flexibility associated with delivering a sustainable, phased urban extension. Phasing the delivery of new development is also very much dependent on viability which has not been acknowledged in draft policy CS3. CS Policy cannot control these phasing matters where site-specific housing and infrastructure trajectories for each new development scheme at the detailed planning and development stages, will only be able to be determined.</p> <p>These Greenfield Allocations for housing should also be reflected in Policy CS4 which addresses development within the towns and large villages. This is particularly important at Hemel Hempstead and Berkhamsted, the Borough's two large towns.</p> <p><b><u>Conclusions on soundness of draft Policies CS2, CS3 and CS4</u></b></p> <p>Draft policies CS2 and CS3 are not considered to be justified because they do not sufficiently acknowledge the requirement to meet local housing needs and demands based on forecasted natural population and household growth within the</p>			

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													<p>plan period.</p> <p>Draft policies CS2 and CS3 are not effective because these policies would not deliver the quantum or distribution of housing needed in the borough and at the right market locations.</p> <p>Draft policy CS3 is not consistent with national planning policy because it does not assist in demonstrating an adequate land supply for housing in the early phases of the Core Strategy plan period.</p> <p>Draft Policy CS4 is not effective or consistent with national policy because it fails to recognise the role of Greenfield Housing Allocations in accommodating housing growth to meet local demand (as examined in the above response to draft Policies CS2 and CS3).</p> <p>Footnotes:</p> <p>1 DCLG. May 2007. Housing Market Information Advice Note.</p> <p>2 DCLG. August 2007. Strategic Housing Market Assessments Practical Guide.</p> <p>3 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 8.7.</p> <p>4 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 1.13.</p> <p>5 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 14.16.</p>			
503032	W	W Lamb Ltd	210965	Mr	Boyer Planning	Managing Selected	CS3	Policy CS 3	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent	Delete Policy CS3.	Yes, I wish to	Significant issue relating to housing

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	Lamb			David Lander		Development Sites						d	with national policy.  There is no justification for this policy which will operate against the effective and flexible delivery of housing in accordance with national policy and the vision and objectives of the Core Strategy - See Section Six of Statement.		participate at the oral examination	provision spatial strategy, Hemel Hempstead Place Strategy.
611657	Messrs M&D Gardener		611650	Mr John Heginbotham	Stimpsons	Managing Selected Development Sites	CS3	Policy CS 3	Supporting	Yes	Yes		As Representation on behalf of Taylor Wimpey by Martin Friend	As Representation on behalf of Taylor Wimpey by Martin Friend	Yes, I wish to participate at the oral examination	Our client's land is a significant component of LA3
211660	Mr Garrick Stevens	Berkhamsted Town Council				Managing Selected Development Sites	CS 3	Policy CS 3	Supporting	Yes	Yes		CS3 Managing Selected Development Sites Support		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
398370	Mr Matt Richardson	Gleeson Strategic Land	621389	Mr Bob Sellwood	Sellwood Planning	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	Yes	No		The Core Strategy is unsound because it is not justified, effective and is not consistent with national policy.  The policy need to be explicit that one of the criteria for the release of selected development sites is housing land supply, both in terms of the five year land supply and achievement of the Borough Housing provision.  The omission of this criterion is not justified and the policy, as drafted will not be effective in delivering a consistent and adequate supply of land as sought by PPS3.	Add an additional criterion to the policy  "the prevailing housing land supply situation".	Yes, I wish to participate at the oral examination	
398585	Mrs Susan					Managing Selected Development	CS 3	Policy CS 3	Objecting	Yes	No		In addition, I understand building on the Icknield Way West site is proposed to be delayed until the		No, I do not wish to participate	

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	Andrews					Sites							<p>latter part of the 20 year plan. This is wrong as people need houses now. The site should be developed for</p> <p>housing within the next 5 to 10 years to prevent the continued exit from town of young people requiring housing and needed to keep the town alive. The town also needs greater footfall of shoppers to encourage</p> <p>current shopkeepers to survive and others to come into the town and successfully operate.</p>		at the oral examination	
4943 10	Mr Elliot Jones	Barratt Strategic	4942 84	Mr Elliot Jones	Rapleys LLP	Managing Selected Development Sites	Paragraoh 27.14	Policy CS 3	Supporting	Yes	Yes		<p>This comment relates to Paragraphs 27.12 - 27.14 relating to flexibility within the Core Strategy.</p> <p>Clearly, flexibility is an important consideration for the Core Strategy (as identified in the guidance of PPS12). It is considered that the proposed approach shows an appreciation of the importance of a flexible strategy to meet the development requirements of the Borough. Our client is therefore supportive of the approach set out.</p> <p>In relation to the specific flexibility mechanisms identified, although our client is generally supportive, we would draw the Council's attention to the separate comments submitted in relation to Policy CS17 in terms of the 'trigger' for reviewing overall housing land supply and release of sites.</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
4943 10	Mr Elliot Jones	Barratt Strategic	4942 84	Mr Elliot Jones	Rapleys LLP	Managing Selected Development Sites	CS 3	Policy CS 3	Supporting	Yes	Yes		Policy CS3 outlines the factors that will guide the release of the Local Allocations for housing, and notes that, until such time, they will be		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with

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													<p>managed as countryside.</p> <p>Criterion (d) of the policy states that it is the Council's intention that the delivery timescales will be clarified in the forthcoming Site Allocations DPD. Whilst our client is supportive of this approach, and is happy to work with the Council and other interested parties, given the importance of the site to the overall housing land supply, it is important that the Site Allocations DPD is progressed quickly.</p> <p>This is because the housing trajectory in the Core Strategy identifies the Local Allocations beginning to deliver units in 2021. Our client would note that there will be a significant 'lead in' time before housing can be realised on the Local Allocations, for instance, there will be a need to achieve the requisite planning consents, the construction of necessary infrastructure as well as the time it takes to build the number of units programmed for 2021.</p> <p>Accordingly, it is suggested that the Council may wish to consider how more certainty could</p> <p>be 'built in' to the overall process, •given that the development of the sites within the defined settlements are predicated on many factors such as market suitability, physical constraints and availability of funding. Our client's concern is that - if there is any delay - this could mean that overall housing supply requirements for Dacorum will not be achieved during the plan period, which could have implications for the Plan's overall objectives.</p>		n	<p>complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
494847		Trustees of Drayton	626780		Cole Flatt & Partners	Managing Selected	CS3	Policy CS 3	Objecting	No	a) Justified	Policy CS3 is particularly strongly opposed. This requires that local	Refer to response to question 4 above	No, I do not wish to		



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		Beauchamp Parochial Charities				Development Sites						d	<p>allocations will be held in reserve and managed as countryside until needed. It goes on to list four criteria against which their release will be determined. Our objection is twofold:</p> <p>1. As a matter of principle, it is considered that to hold back certain sites is wholly unjustified given the high levels of need and inadequate provision; they are not "reserve" sites. The identification, and delayed release, of reserve sites can only be justified where a plan intentionally over-allocates for housing in order to provide flexibility so that shortfalls from other planned sources ('baseline' allocations) can be made good by the early release of reserve sites. This is clearly not the case here.</p> <p>Neither the policy itself nor the supporting text gives clear justification why or for what purpose local allocations are to be held back. This has no support in the NPPF; indeed such an approach would only serve to unnecessarily delay the provision of badly needed housing and the wider economic recovery. On the contrary, there is unequivocal evidence that these sites are needed now and their implementation should be encouraged rather than opposed.</p> <p>2. The criteria do not provide a clear set of tests against which decisions to release the local allocations are to be made. While it is noted that the intended release dates are to be set out in a forthcoming Site Allocation DPD, there is no guarantee that DPD will be completed in a timely manner, ahead of when a site might be needed. There should be more</p>		participate at the oral examination	

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													<p>detailed guidance in the CS, or cross reference to such guidance in a SPD, that sets out how performance is to be monitored and what circumstances will trigger release.</p> <p>Such details are provided in part in Policy CS17, which refers to the need to "take action" to increase housing land supply should completions fall below 15% of the housing trajectory. However, there is no reference in this policy to the release of local allocations and the relationship between the two (Policies CS3 and CS17) is unclear.</p> <p>It would appear that the Council is seeking to impose a 'double lock' on development by firstly setting an overall housing target that is too low to meet need and then also delaying the delivery of part of the inadequate provision that is proposed. There is no need or justification to hold back local allocations and Policy CS3 should be deleted.</p>			
515465	Mr Alan Kemp	Berkhamsted Town Council				Managing Selected Development Sites	CS3	Policy CS 3	Supporting	Yes	Yes				Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.
620224	Mr Stephen Harris	Emery Planning Partnership				Managing Selected Development Sites	CS3	Policy CS 3	Objecting	No	No	c) Consistent with national policy	<p>Policies CS2 and CS3 set out the policy for the selection and management of development sites. The pre-submission Core Strategy relies on a number of local allocations in the Green Belt in order to meet the housing requirement set out in policy CS17.</p> <p>From the Council's own assessment it is clear that any concerns on Waterside Way can be addressed and the site should be included in</p>		Yes, I wish to participate at the oral examination	Please see attached

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													the Core Strategy either in place of the land to the west or in addition to. The housing need would justify the allocation of one or more sites in Tring.  Summary - see full planning statement submitted for a comparison of the two locations referred to).			
620224	Mr Stephen Harris	Emery Planning Partnership				Managing Selected Development Sites	CS3	Policy CS 3	Objecting	No	No	c) Consistent with national policy	Policies CS2 and CS3 set out the policy for the selection and management of development sites. The pre-submission Core Strategy relies on a number of local allocations in the Green Belt in order to meet the housing requirement set out in policy CS17.  From the Council's own assessment it is clear that any concerns on Waterside Way can be addressed and the site should be included in the Core Strategy either in place of the land to the west or in addition to. The housing need would justify the allocation of one or more sites in Tring.  Summary - see full planning statement submitted for a comparison of the two locations referred to).		Yes, I wish to participate at the oral examination	Please see attached
625293		BIDWELLS				Managing Selected Development Sites	CS3	Policy CS 3	Supporting	Yes	Yes		Our client supports the general principle of development within the West Hemel Hempstead location and development strategy for growth within the Borough (Policy CS1).  With specific regard to development West of Hemel Hempstead:  CS3, refers that the Local Allocations will be held in reserve, the phasing of which is a matter for the Sites Allocations DPD. Whilst			

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													the phasing is held over until the Sites Allocation DPD and, therefore, not a consideration under the CD, we would comment that schemes of 900 units need to be "brought on-stream" in sufficient time to allow delivery with the CS period"			
625438	Mr Chris Ball		625439	Mr Adam Halford	Bidwells	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy.  We object to Policy CS3 in so far as it relates to Local Allocation LA4, on the grounds that it is neither 'justified' nor 'effective'. Our principle concern is that it does not provide a consistent approach through the Development Plan Document. In particular Policy CS3 states 'Local allocations will be held in reserve and managed as countryside until needed'.  It is our opinion that LA4 already meets the key relevant tests under Policy CS3 and should therefore be given greater certainty regarding its delivery. The Old Orchard and Hanbury's sites are available now and deliverable within the short term.	Add further delivery detail to Allocation Proposal LA4:  "Development will be programmed in order to enable the completion of the Shootersway/Kingshill Way junction improvements in advance of, or alongside, Strategic Site Proposal LA4".	Yes, I wish to participate at the oral examination	It is our belief that Allocation Proposal LA4 is important to meeting the new homes targets set out in the Core Strategy and it is therefore important that the site is represented at the examination.
625652		Berkhamsted School	625654	Mr Peter Dines	Gerald Eve LLP	Managing Selected Development Sites	CS3	Policy CS 3	Supporting	Yes	Yes		Whilst concern is expressed regarding the lack of strategic sites proposed for new housing, it is considered that the framework for urban extensions provided by draft policies CS2 and CS3, in conjunction with draft Policy CS5, set an appropriate policy context for the forthcoming Site Allocations DPD to identify sites in the Green Belt that are suitable and capable of coming forward for future development.  Draft Policy CS5, together with draft	No change sought.	No, I do not wish to participate at the oral examination	

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													policies CS2 and CS3, sets out a strategic approach to allow limited urban extensions through small-scale Green Belt boundary changes in accordance with National Planning Policy. It is also considered to be 'justified' given the uncertainty at this stage as the ability of settlements including Berkhamsted to accommodate their associated housing requirement within their existing boundaries. The policy approach is also considered effective, by being sufficiently flexible in setting the broad parameters for the Site Allocations DPD to identify sites to come forward to deliver new housing.			
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	No	a) Justified	<p>Policy CS3 is particularly strongly opposed. This requires that local allocations will be held in reserve and managed as countryside until needed. It goes on to list four criteria against which their release will be determined. Our objection is twofold:</p> <p>1. As a matter of principle, it is considered that to hold back certain sites is wholly unjustified given the high levels of need and inadequate provisions of housing in the Borough. Local allocations are an integral part of planned housing provision; they are not "reserved" sites. The identification, and delayed release, of reserve sites can only be justified where a plan intentionally over-allocates for housing in order to provide flexibility so that shortfalls from other planned sources ('baseline' allocations) can be made good by the early release of reserve sites. This is clearly not the case here.</p> <p>Neither the policy itself nor the supporting text gives clear justification why or for what purpose</p>	Refer to response to question 4 above.	No, I do not wish to participate at the oral examination		

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													<p>local allocations are to be held back. This has no support in the NPPF; indeed such an approach would only serve to unnecessarily delay the provision of badly needed housing and the wider economic recovery. On the contrary, there is unequivocal evidence that these sites are needed now and their implementation should be encouraged rather than opposed.</p> <p>2. The criteria do not provide a clear set of tests against decisions to release the local allocations are to be made. While it is noted that the intended release date are to be set out in a forthcoming Site Allocations DPD, there is no guarantee that such DPD will be completed in a timely manner, ahead of when a site might be needed. There should be more detailed guidance in the CS, or cross reference to such guidance in an SPD, that sets out how performance is to be monitored and what circumstances will trigger release.</p> <p>Such details are provided in part in Policy CS17, which refers to the need to "take action" to increase housing land supply should completions fall below 15% of the housing trajectory. However, there is no reference in this policy to the release of local allocations and the relationship between the two (Policies CS3 and CS17) is unclear.</p> <p>It would appear that the Council is seeking to impose a 'double lock' on development by firstly setting an overall housing target that is too low to meet need and then also delaying the delivery of part of the inadequate provision that is proposed. There is no need or justification to hold back local</p>			

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													allocations and Policy CS3 should be deleted.			
627495	Mr Nigel Agg	TAYLOR WIMPEY UK LTD	210999	Mr Martin Friend	Vincent & Gorbing	Managing Selected Development Sites	CS 3	Policy CS 3	Objecting	Yes	No		<p>Taylor Wimpey support the approach to the selection and management of development sites set out in Policies CS2 and CS3.</p> <p>It is accepted that as a general approach, previously developed land should be prioritised over other potential land, as embraced in Policy CS2. However, it is also considered that in order to ensure flexibility and deliverability within the plan period, other factors need to be considered in determining the exact timing of the release of local allocations. Policy CS3 takes this approach and it is welcomed. Once identified there are clearly a number of factors which could result in the local allocations being brought forward. As set out in Policy CS3, this could relate to housing need in general (whether in numerical terms or in terms of the need for a type or tenure of housing) as well as the impact and provision of infrastructure in the settlement.</p> <p>Again, Taylor Wimpey would suggest a minor textual change in this respect</p> <p>by the addition in criterion (a) of Policy CS3 to state that development will be guided by inter alio "the availability of existing and the proposed provision of new infrastructure in the settlement." This is implied in criterion (c) which allows for the benefits of development to guide the timing of release: such benefits could arise from the provision of new infrastructure associated with the development of the local allocations and it is suggested that this change</p>		Yes, I wish to participate at the oral examination	As an experienced housebuilder, Taylor Wimpey wish to appear at the examination to assist the inspector in considering the soundness of the overall development strategy, housing requirements and provision and the LA3 Local Allocation.

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													<p>might help clarify this point.</p> <p>Taylor Winnpey accept that the exact timing of the release of the Local Allocations will be a matter for the Site Allocations DPD, and TW have committed to working closely with the Council in respect of West Hemel Hempstead at this more detailed stage of the plan-making process. It is accepted that the Core Strategy will establish the principle of the release of the Local Allocations allowing further detailed work to be taken forward from a position of certainty.</p> <p>The housing trajectory indicates that, as presently forecast, the Greenfield sites within the Core Strategy may need to start delivering units in 2021. The Site Allocations DPD will need to consider the steps required in order to achieve this, including the time required to achieve all requisite planning permissions, the detailed design, procurement and implementation of infrastructure, and the construction and sale of completed units. This time period will clearly be several years and for this reason the certainty that will be engendered by the identification of the Local Allocations in principle within the Core Strategy, together with the timely progress on the Site Allocations DPD, is critical to the soundness of the planning strategy for the area.</p>			
627374		Brightman & Ball	627371	Mr Andrew Wilkins	Lone Start Land Ltd	Managing Selected Development Sites	CS3	Policy CS 3	Objecting	Yes	No	a) Justified	<p>The core strategy is unsound because it is not justified and is not effective.</p> <p>Please refer to the accompanying Planning Statement for full response.</p>	Further delivery details should be added to the site proposal LA5 to refer to development being programmed in order to enable the completion of the Shootersway/Kingshill Way junction improvements in advance of, or alongside, Strategic Site Proposal SS2 or the site should	Yes, I wish to participate at the oral examination	Local Allocation Proposal LA4 is a fundamental component of the



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													In summary, our clients fully support the principle of a joint development of the Hanburys and The Old Orchard site local allocation site and overall support the Core Strategy. However, objection is raised to Policy CS3 Managing Selected Development Sites in its current form as it is neither 'justified' nor 'effective' and as such is unsound. The site Hanburys and The Old Orchard already meets the key relevant tests under Policy CS3 and should therefore be given greater certainty regarding delivery. The delivery of the site would assist the housing targets of the Core Strategy and is essential to achieving the objectives of the Berkhamsted Place Strategy and therefore the strategic objectives of the Core Strategy. The site is available now and deliverable within the short term. The early release of the site will bring benefits to the settlement; address local housing needs and is well served by existing and planned infrastructure.	be re-categorised as an additional strategic site proposal for Berkhamsted.		Core Strategy. There should be professional representation in its respect at the Examination where there will be the opportunity to provide further evidence if necessary.
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	The Towns and Large Villages	CS4	Policy CS 4	Supporting	Yes	Yes		The Trust welcomes and supports Policy CS4 which encourages small scale social, community, leisure and business uses in residential areas. This approach has already permitted one additional place of worship for local needs in Hemel Hempstead.			
211055	Mr Matthew Wood	Hertfordshire County Council				The Towns and Large Villages	CS4	Policy CS 4	Supporting	Yes	Yes		Recognition of the need for town and local centres to incorporate a mix of uses is welcomed. The fact that social and community uses are encouraged as part of that mix (and does not exclude them), will assist in the event that changes to service provision is required during the plan period.		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector

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																understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	The Towns and Large Villages	CS4	Policy CS 4	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy.  Draft policies CS2, CS3 and CS4 regarding the selection and management of development sites are not considered sound because they do not sufficiently acknowledge the requirement to address local housing needs based on forecasted natural population and household growth. GUI acknowledges that draft Policy CS2 (B) identifies a series of sustainability credentials to be met and which are considered a reasonable approach for considering extensions to defined settlements more generally.	For the reasons set out above, the following additions (indicated in bold and deleted in strikethrough) are considered necessary in order to make the Core Strategy sound:  <b>Policy CS4: The Towns and Large Villages Development will be guided to the appropriate areas within settlements.</b>  .....  In town centres and local centres a mix of uses is sought. The following uses are encouraged:  (a) shopping uses (including financial and professional services and catering establishments);	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.

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													<p>PPS3 states that Local Planning Authorities should deliver "a sufficient quantity of housing taking into account need and demand and seeking to improve choice." Annex C of PPS3 adds that Strategic Housing Market Assessments (SHMAs) should "determine how the distribution of need and demand varies across the plan area", consider " <i>demographic trends, and identify the accommodation requirements of specific groups</i> ". The DCLG Practice Guide 3[1&amp;2] sets out the requirement for analysis of past and current housing market trends, including balance between supply and demand in different housing sectors in addition to consideration of future household estimations.</p> <p>The overall thrust of current Government policy as set out in the National Planning Policy Framework (NPPF) is meeting local housing demand and delivering new homes at the right market locations. It states that LPAs should identify a scale and mix of housing that the local population is likely to require over the plan period and specifically states that planned growth should "meet household and population projections, taking account of migration and demographic change".</p> <p>It is therefore essential that DBC's housing target for the plan period is justified by a robust evidence base that takes into consideration existing and projected population and household growth within the CS Plan Period (to 2031). The Pre-Submission CS consultation document recognises this requirement. It states that the borough's towns cannot sustain themselves unless there is</p>	<p>(b) compatible leisure uses;</p> <p>(c) business uses, including offices;</p> <p>(d) residential uses; and</p> <p>(e) social and community uses.</p> <p>In open land areas the primary planning purpose is to maintain the generally open character. Development proposals will be assessed against relevant open land policies.</p> <p><b>Urban extensions to Hemel Hempstead and Berkhamsted in the form of Housing Allocations will accommodate residential development in order to contribute towards local housing and socio-economic needs and demands.</b></p> <p>Mixed-use development will be supported where it supports the principles of sustainable development and does not conflict with other policies.</p> <p>In all areas, ancillary uses will be acceptable and protected, provided that they support the primary function of that area.</p>		

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													<p>investment and they are allowed to adapt and grow[3], and meet their local housing needs[4]. The consultation document also acknowledges that the choice of housing target has considered " <i>the amount needed to meet forecast household growth in the borough</i> "[5]. However, this is not reflected in draft policy CS2 regarding the selection of development sites.</p> <p>It is considered that draft policy CS3 (which is linked to draft policy CS2) is unsound as it is not consistent with national policy. As identified above, PPS3 and the NPPF emphasise the need for Local Authorities to demonstrate an adequate supply and range of housing opportunities. To secure certainty for developers and investors there should be a clearly defined and sufficiently robust supply of land identified up front to meet housing needs. Greenfield allocations should therefore not be " <i>held in reserve until needed</i> ", particularly given the current pressing need for new housing to meet current and expected housing demands within the Plan period.</p> <p>Certain Green Belt, greenfield sites may well be appropriate for earlier release in terms of their wider objectives. To hold these in reserve will simply sterilise housing delivery. This approach also fails to acknowledge phasing and market flexibility associated with delivering a sustainable, phased urban extension. Phasing the delivery of new development is also very much dependent on viability which has not been acknowledged in draft policy CS3. CS Policy cannot control these phasing matters where site-specific housing and infrastructure trajectories for each new</p>			

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													<p>development scheme at the detailed planning and development stages, will only be able to be determined.</p> <p>These Greenfield Allocations for housing should also be reflected in Policy CS4 which addresses development within the towns and large villages. This is particularly important at Hemel Hempstead and Berkhamsted, the Borough's two large towns.</p> <p><b><u>Conclusions on soundness of draft Policies CS2, CS3 and CS4</u></b></p> <p>Draft policies CS2 and CS3 are not considered to be justified because they do not sufficiently acknowledge the requirement to meet local housing needs and demands based on forecasted natural population and household growth within the plan period.</p> <p>Draft policies CS2 and CS3 are not effective because these policies would not deliver the quantum or distribution of housing needed in the borough and at the right market locations.</p> <p>Draft policy CS3 is not consistent with national planning policy because it does not assist in demonstrating an adequate land supply for housing in the early phases of the Core Strategy plan period.</p> <p>Draft Policy CS4 is not effective or consistent with national policy because it fails to recognise the role of Greenfield Housing Allocations in accommodating housing growth to meet local demand (as examined in the above response to draft Policies</p>			

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													CS2 and CS3).  Footnotes:  1 DCLG. May 2007. Housing Market Information Advice Note.  2 DCLG. August 2007. Strategic Housing Market Assessments Practical Guide.  3 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 8.7.  4 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 1.13.  5 Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 14.16.			
211660	Mr Garrick Stevens	Berkhamsted Town Council				The Towns and Large Villages	CS 4	Policy CS 4	Supporting	Yes	Yes		Towns and Large Villages Support		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
398370	Mr Matt Richardson	Gleeson Strategic Land	621389	Mr Bob Sellwood	Sellwood Planning	The Towns and Large Villages	CS4	Policy CS 4	Objecting	Yes	No	b) Effective	The policy is not effective since it is unclear. The policy relates to 'The Towns and Larger Villages' and the first sentence states that 'Development will be guided to appropriate areas within settlements'. However, the plan also proposes a limited number of local allocations and this should be reflected in this sentence	Amend the first sentence of CS4 as follows  "Development will be guided to the appropriate areas within settlements and to the local allocations".	Yes, I wish to participate at the oral examination	
515465	Mr Alan Kemp	Berkhamsted Town Council				The Towns and Large Villages	CS4	Policy CS 4	Objecting	Yes	No	b) Effective	The present local plan includes Character Area Assessments that have proved extremely useful in appraising the suitability of development. The Character Area Assessments should be retained as a source of planning policy in the	Add ", in particular, the Character of the Area" at the end of the last sentence.	Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.

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													<p>new LDF.</p> <p><b>Representation:</b></p> <p><b>1. Page 59, Policy CS4, Support, except for second paragraph.</b></p> <p><b>Representation;</b></p> <p><b>1. Page 59, Policy CS4, second paragraph. Object</b></p> <p>2. Sound No</p> <p>3. Effective No</p> <p>4. The present local plan includes Character Area Assessments that have proved extremely useful in appraising the suitability of development. The Character Area Assessments should be retained as a source of planning policy in the new LDF.</p> <p>5. Add ", in particular, the Character of the Area" at the end of the last sentence.</p>			
620224	Mr Stephen Harris	Emery Planning Partnership				The Towns and Large Villages	CS4	Policy CS 4	Objecting	No	No	c) Consistent with national policy	See main submission.		Yes, I wish to participate at the oral examination	Please see attached
620322		West Herts College	620319	Ms Alison Tero	CBRE	The Towns and Large Villages	CS4	Policy CS 4	Objecting	Yes	No		<p>WHC generally supports Policy CS4 but considers that the mix of uses sought in town centres and local centres should be expanded and re-ordered to align with the main uses to which the town policies identified in PPS4 apply (PPS4, paragraph 7), in addition to residential uses and social and community uses including educational facilities.</p> <p>WHC considers that paragraph 5 should be re-worded to reflect a</p>		Yes, I wish to participate at the oral examination	West Herts College (WHC) would like to participate at the oral part of the Examination if its proposed recommendations (as set out in these representations)

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													more positive stance to the management of development in the borough's towns and large villages and the objective of CS4 with regards to shopping, business and residential uses should be to plan for consumer choice and competitive town centres with a mix of uses that support accessible and sustainable places.			are not included in the Submission version of the Core Strategy.  WHC would like the opportunity to set out its reasoning for the recommendations made in its representations to ensure that the policies and vision set out in Core Strategy are considered 'sound' and that they support WHC's proposals for its Dacorum Campus.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.22	8.22	Supporting	Yes	Yes				No, I do not wish to participate at the oral examination	
490893	Mrs christine kavanagh					Paragraph	8.23	8.23	Supporting	Yes	Yes		In full support of strategy to protect the countryside and restrict development in these areas		No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.23	8.23	Supporting	Yes	Yes	a) Justified	See BRAG comments on paragraphs 3.21 & 3.22		No, I do not wish to participate at the oral examination	
211072	Ms Katherine Fletcher	English Heritage				Paragraph	8.23	8.23	Objecting	Yes	No		For Berkhamsted, we recommend that the wording should be amended to read '...and retain the town's unique valley setting, including the landscape setting of the castle'.			



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211434	Ms Joanne Deacon	Chipperfield Parish Council				Paragraph	8.23	8.23	Supporting	Yes	Yes		We support the policy of ensuring that creeping development from large towns such as Hemel Hempstead, Watford and Aylesbury does not envelop large villages such as Bovingdon and Kings Langley.		No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.24	8.24	Objecting	Yes	No	b) Effective	BRAG considers that the section relating to Berkhamsted should be strengthened to ensure a clear boundary is maintained between the town and the A41.	Suggested wording:  Berkhamsted – to prevent coalescence of Berkhamsted with Bourne End, Dudswell and the A41 and retain the town's unique valley setting.	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
488516	mr hugh siegle					Paragraph	8.24	8.24	Supporting	Yes	Yes	c) Consistent with national policy	I strongly support this policy		No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.28	8.28	Objecting	Yes	No	a) Justified	While BRAG endorses the statement that "A strategic review of Green Belt boundaries is not required" it refutes the need for any Green Belt releases in Berkhamsted. See comments on 1.13 (a) regarding projected housing needs in Berkhamsted.		Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	8.29	8.29	Objecting	No	No	b) Effective	This paragraph is compromised by the wording. Inappropriate development can never be appropriate by definition.	A single sentence will suffice and is appropriate:  The Green Belt will be protected from inappropriate development in accordance with national policy and remain essentially open in character.	No, I do not wish to participate at the oral examination	
488516	mr hugh siegle					Paragraph	8.29	8.29	Supporting	Yes	Yes	a) Justified	I support this policy subject to incursion into Green Belt being restricted to examples referred to in 8.25		No, I do not wish to participate at the oral examination	
4984	Steve	CPRE - The				Paragraph	8.29	8.29	Objecting	Yes	No	a)	It is not sound because it is not	Wording to be agreed with the	Yes, I wish	To ensure that the

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29	Baker	Hertfordshire Society							g	s		Justified	Justified or Consistent with national policy.  Because inappropriate development in the Green Belt must only be permitted if justified by very special circumstances, the final sentence of this paragraph should be amended to be consistent with national policy. The circumstances in the sentences as currently worded would not normally be considered to be 'very special'.	Council to ensure that paragraph 8.29 reflects the presumption against inappropriate development.	to participate at the oral examination	Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	8.30	8.30	Supporting	Yes	Yes		We support the stated intentions in this paragraph as a contribution to meeting housing needs without the need for the allocation of Green Belt sites for development.			
610637	Mr Richard Sears	BFI				Paragraph	8.31 Major Developed Site Status within the Green Belt	8.31	Supporting	Yes	Yes		First of all I am writing to indicate BFI's support of paragraph 8.31 and associated Table 2 regarding Major Developed Sites status in the Green Belt in the Pre-Submission Core Strategy.  About the BFI National Archive  Established in 1935, the BFI National Archive preserves one of the largest and most significant moving image collections in the world.  The BFI National Archive is the official National Television Archive, as designated by Ofcom. The Archive is funded by broadcasters to select material from the current output of ITV, Channel Four and Five, recording off-air to broadcast and viewing standard for preservation and access. The copies acquired are exactly as they		No, I do not wish to participate at the oral examination	

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													<p>were seen by the public.</p> <p>The collections are of national and international importance as a record of the history and culture of filmmaking and television production, and as a record of the contemporary life of the UK from the late 19th century to the present.</p> <p>They are an unparalleled resource for researchers, students, filmmakers and television producers, historians and any interested member of the public.</p> <p>The BFI supports the Core Strategy as we look to securing Major Developed Site Status within the Green Belt, to ensure our future at our Kingshill Way Site. Having this designated status would allow us to 'future proof' our site with some 'infill development' for expansion of the National Collections and a provision to replace our temporary buildings.</p> <p>Our most recent plans allow for moving Master Film Material to our new Film Store at Gaydon, in order to secure this important element of the Collections in a Sub Zero humidity controlled environment, which gives us the opportunity to relocate some of our other Collections to Berkhamsted.</p> <p>As part of our current Archive Modernisation Strategy we will be remodelling one of our Acetate Vaults to receive 'mixed media' which will also allow us to expand</p>			

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													<p>our Special Collections (Film &amp; Television Paper related Collections) as well as absorb part of the BFI Film Library. This in turn makes accessing the Collections for Research purposes much simpler and fits well with the provision of a New Research Area at Berkhamsted.</p> <p>The BFI employ around 100 staff both directly and indirectly which in itself benefits the local economy. Other than local employment we do utilise the services of many local businesses within Dacorum. We also use the service of Caterers, Specialist Removers, Decorators, Electrical Contractors, Builders, Grounds Maintenance contractors and Courier services.</p> <p>The BFI engages with the local community in various ways but primarily through our involvement with the Rex Cinema. We currently provide several films each month which are quite often projected by a BFI member of staff. We have also provided our Boardroom for use by local groups such as Dacorum Borough Council's 'Housing Options Project' and the reformation of Berkhamsted Football Club following their demise in 2009. We also engage with community groups and Schools locally by way of organised visits and Work experience.</p> <p>September this year saw the start of a series of 'Heritage' Open Days giving an insight into the BFI</p>			

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													National Archive to members of the General Public.  We also plan to create a Research area within the Conservation Centre.			
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	8.31	8.31	Objecting	Yes	No	a) Justified	Whilst supporting the criteria set out, criterion (d) should include 'community benefits' as well as the 'economic prosperity' and 'environmental improvements' referred to.	Wording to be agreed with Council, possibly to include 'community benefits' after the words 'will help to secure'.	No, I do not wish to participate at the oral examination	
627695	Mr W Cleeve	Hogarth Properties	627696	Mr Tim Waller	JB Planning Associates	Paragraph	8.33	8.33	Objecting	Yes	No	a) Justified	It is unsound because it is not Justified or Effective, with national policy.  As drafted, Policy CS6 represents a more restrictive version of Policy 6 of the current Local Plan, precluding the possibility of infill market housing being built in the selected small villages in the Green Belt, and its supporting text gives a more restrictive definition of where infill development may be located. The Inspector's report into the current Local Plan considered these issues in detail, and the Inspector's conclusions contradict the approach taken in the draft Policy CS6. The Council's evidence base does not set out the reasons as to why they have chosen to make this policy more restrictive, or their justification for doing so. Policy CS6 is currently too restrictive and inflexible, and is not sound because it will fail to meet 'local needs'.  Policy CS6 has been drafted so as to preclude market housing from	<b>Proposed Amendments</b>  As Policy 6 of the Local Plan can be seen to have been failing to provide new affordable housing in these villages, Policy CS6 must take a more flexible approach if it is truly to be able to deliver affordable housing, and other development, which will meet 'local needs'. We suggest the inclusion of the following clause into the policy:  <b>(g) residential development for sale on the open market, where this will help to deliver affordable housing or other facilities for which there is a proven local need.</b>  We also suggest that Policy CS6 should encourage the use of Council land and facilities to help deliver new development which will meet proven local needs, such as by providing a site for affordable housing which is to be funded by financial contributions from other development sites. We believe it would be appropriate to	Yes, I wish to participate at the oral examination	Policy CS6 is the key policy relating to development in the villages it names, and we are keen to ensure that the mistakes of the previous Policy 6 are not repeated, and that local needs can be met through the provisions of this policy. We therefore wish to have the opportunity to take part in the discussion at the Examination over the document's soundness as drafted, and how it might be amended.

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													<p>coming forward in the small villages within the Green Belt, where infill opportunities exist within these villages. The Policy specifies that infill housing should be 'affordable' and 'for local people', and this is echoed in paragraph 8.34. This issue was previously considered in relation to Policy 6 of the Local Plan (referred to as Policy 4 in the Local Plan Inspector's Report). The Inspector considered that representations suggesting only affordable housing should be permitted in these villages were not justified or reasonable. He concluded that the requirement for new housing to meet a 'local need' provided sufficient restriction to prevent normal market housing development from coming forwards in most circumstances, but did not preclude such development, where it might satisfy the 'local need' test.</p> <p>In terms of market housing which would be consistent with the 'local needs' test, the Inspector noted that, in addition to housing for agricultural workers or 'to provide affordable housing', market housing may for instance be required for people employed by a local business (IR, para 4.42.11). He noted that the appropriateness of market housing is 'best assessed at the time, rather than being ruled out at this stage', and it was neither necessary nor appropriate to preclude the provision of affordable housing. He noted:</p> <p><b>'I consider it is appropriate for Policy 4 to maintain a degree of flexibility at the local level. Although it may be difficult to establish that open market</b></p>	include a statement to this effect within the policy.		

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													<p>housing will meet a genuine local need, I do not believe this should be ruled out in principle.' (IR 4.42.11)</p> <p>The same reasoning is relevant with regard to the current draft policy. The Inspector's conclusions were drawn in relation to the advice in PPG2, which is the national planning policy document against which the current draft policy must be considered. PPG2 does not require all infill development to be for affordable housing, but by inference allows for market housing. PPG2 also says that policies should ensure that any infilling should not have any adverse effect on the character of the village concerned, and this point is covered by point (i) of the draft Policy.</p> <p>We have experience of the way in which the council have interpreted the policy in the determination of planning applications, and they have been clear that the 'local need' clause prohibits most market housing, while accepting that it may be permitted in exceptional circumstances which help to serve a local need, such as through helping to provide affordable housing. In fact, our experience of the interpretation of Policy 6 of the Local Plan, is that it has caused confusion and inconsistent decision making. This is principally related to the Council's interpretation of 'local need'. While this may have been intended to relate to a number of different issues at the time of the adoption of the Local Plan, it has increasingly been considered to relate only to the provision of affordable housing. This change in thinking is evident through the Council's proposed changes to the revised Policy CS6, which changes</p>			

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													<p>the previous clause concerning residential infilling to meet a proven local need to a simplified clause relating to 'affordable housing for local people.'</p> <p>However, despite this change in emphasis, the Local Plan policy has failed to deliver any significant amount of affordable housing, and therefore generally failed to meet local needs due to its inflexible interpretation. The Council's Annual Monitoring Report (AMR) for 2009/10 shows that the provision of affordable housing within the District has consistently been below the Council's target, set in the East of England Plan. The AMR 2009/10 records that 685 affordable dwellings have been completed since 2001, against a requirement for 1,125, leaving a cumulative shortfall of 440 dwellings to date. Appendix 3 of this AMR lists the affordable housing developments which have recently been completed (96 dwellings), those which are currently under construction (80 dwellings), and those which either have planning permission (278 dwellings), or which it is speculated may come forward for development (369 dwellings). Out of all of these figures, only 6 dwellings, on a small site in Chipperfield, are to come forward in one of the selected small villages in the Green Belt. This site is being brought forward by a Housing Association, as a rural exception site. It is therefore clear that the current Policy 6 does not promote affordable housing to meet local needs, as none of the houses listed in the AMR are coming forward under its provisions. However, despite this, the draft policy is even more restrictive with regard to market housing, which is one of the</p>			



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													<p>few means by which affordable housing could be delivered in these villages.</p> <p>A new policy must therefore be designed to overcome the failure of the previous policy to meet local needs, and to provide affordable housing. When looking to design a new policy, which can deliver affordable housing to meet the local needs of these villages, it is important to consider the mechanisms by which affordable housing will be delivered in the future. The Government have recently cut funding for affordable housing so dramatically that the number of new starts on affordable housing developments at a national level dropped from 35,735 between October 2010 and March 2011, down to 454 between April and September 2011<sup>1</sup>, a 99% fall. The Government's intention is for affordable housing to be delivered through their new affordable rent scheme, with housing associations funding and building housing on the basis of rents paid through the benefits system of up to 80% of the normal market rent. This system is still unproven, and its implementation is the reason for the recent hiatus in affordable house building. Housing associations are understandably concerned about the increased financial risks they will be expected to bear under the new system, and there is uncertainty over the number of houses which may be delivered by the new system. At the same time, the Government has cut its grant funding, the means by which the majority of affordable housing was delivered until recently, by around 65%<sup>2</sup>, and we understand that little or no grant funding remains</p>			

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													<p>nationally for the period up to 2015.</p> <p>Given the cut in funding, and the uncertainty over the new system, it is likely that, if any significant amount of affordable housing is to be built in the next four years, and beyond, a significant financial contribution will still be required from market housing developments. Market housing can help to deliver affordable housing both through on-site provision in new developments, and through financial contributions to off-site developments.</p> <p>We believe it is important for Policy CS6 to have sufficiently flexible to allow infill development that will meet local needs. Where this will mean market housing which can help to fund affordable housing, the Policy must allow for this. As we have noted, the existing Local Plan policy was amended by the Inspector to allow for market housing to be provided, where this would help to meet a local need, which includes the provision of affordable housing. Given the recent difficulties experienced in delivering affordable housing nationally, and the unproven nature of the Government's new system, it is only sensible to allow flexibility within the replacement policy, to allow it to be effective, and to deliver the housing which local people need.</p> <p><b>Delivering Local Facilities</b></p> <p>We note that Policy CS6 has been drafted to allow for the delivery of 'local facilities to meet the needs of the village'. We would speculate that the need for such facilities may be identified through a neighbourhood plan, or through the village appraisals referred to in paragraph</p>			

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													<p>8.33 of the draft Core Strategy. They might include, for instance, a new church hall or new sports facilities. However, the funding mechanisms for these facilities is unclear, and it is our experience that market housing is often required to deliver expensive new facilities of this nature.</p> <p>If a neighbourhood plan, which the recent Localism Bill has clarified would now be part of the development plan, were to specify the need for an expensive new facility, there is no indication in the draft policy or its supporting text of how this would be delivered.</p> <p><b>The Form and Location of Mill Development</b></p> <p>The supporting text for Policy CS6, at paragraph 8.34, also outlines a particularly restrictive approach to the definition on 'infill development'. We believe this definition is too restrictive and insufficiently flexible to meet the local needs of these villages in all cases, and this is an issue better left to the determination of individual planning applications.</p> <p>The Local Plan Inspector also considered this issue, and concluded that:</p> <p><b>'Turning to the location of the infill, while I appreciate the Council's desire to restrict insensitive "backland" developments, I consider limiting development to gaps in an otherwise built-up frontage is unduly restrictive. Many of the villages are characterised by a much more complex pattern of</b></p>			

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													<p>development, especially close to their core. Within this context new infill development could in some cases be accommodated on "backland" sites without detriment to the character of the village or to the openness of the Green Belt. In my opinion, clause (i), which requires development to be sympathetic to its surroundings, is a sufficient safeguard against poorly designed or visually damaging schemes. Consequently, I see no need for the additional limitation set out in clause (iii), which in my view imposes a potentially harmful rigidity on future infill schemes. I therefore recommend that the Plan be modified by the deletion of clause (iii).' (IR, 4.42.24)</p> <p>We agree with the Inspector's comments, and have seen no evidence to justify the revised approach taken in the draft Core Strategy. We suggest that the references to infill development should be removed from paragraph 8.34.</p> <p><b>Soundness</b></p> <p>As drafted, Policy CS6 and its supporting text is unsound because it is not justified. No evidence has been presented to explain the changes from Policy 6 of the Local Plan in relation to prohibiting market housing in infill developments, and the altered definition of infill development. The Inspector considering the Local Plan considered similar proposed changes to be overly restrictive, and contrary to the overall aims of the current Policy 6, as they would fail to meet local needs, and no evidence has been provided to</p>			

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													<p>show this is not still the case.</p> <p>The changes will also render Policy CS6 ineffective, as it will not generally be possible to deliver new development to meet local needs, whether this is affordable housing, pr other community facilities. The performance of Policy 6 of the Local Plan shows that it is already failing to provide affordable housing in these villages, and Policy CS6 will</p> <p>need to take a less restrictive approach to development if it is not to continue to fail to meet local needs. It should therefore permit limited market housing, where this will help to fulfil the aims of the policy by delivering development that will meet proven local needs.</p>			
211055	Mr Matthew Wood	Hertfordshire County Council					Table 2	Table 2	Supporting	Yes	Yes		<p>The identification of Kings Langley Secondary and Ashlyns Schools as Major Developed Sites in the Green Belt is noted. Separate representations have been made to DBC on behalf of Kings Langley Secondary School which seek to explore the potential for amending the Major Developed Site boundary at Site Allocations stage.</p> <p>Similarly, it should be noted that in previous representations, Hertfordshire Property indicated that ;</p> <p>While it is noted that Kings Langley Secondary and Ashlyns are identified as Major Developed Sites in the Green Belt, the need for greater flexibility applies across all secondary school sites whatever the settlement so there is a need to review both MDS infilling boundaries as well as introducing a</p>		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and

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													<p>suitable criteria in open land designations to enable educational development where that can be justified'.</p> <p>As far as the Green Belt is concerned, Policy CS 23 - Social Infrastructure appears to provide the mechanism to deliver on this requirement, which HCC presume will be clarified in subsequent Site Allocations Documents or Development Management Development Plan Documents.</p>			the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
610637	Mr Richard Sears	BFI					Table 2	Table 2	Supporting	Yes	Yes		<p>First of all I am writing to indicate BFI's support of paragraph 8.31 and associated Table 2 regarding Major Developed Sites status in the Green Belt in the Pre-Submission Core Strategy.</p> <p>About the BFI National Archive</p> <p>Established in 1935, the BFI National Archive preserves one of the largest and most significant moving image collections in the world.</p> <p>The BFI National Archive is the official National Television Archive, as designated by Ofcom. The Archive is funded by broadcasters to select material from the current output of ITV, Channel Four and Five, recording off-air to broadcast and viewing standard for preservation and access. The copies acquired are exactly as they were seen by the public.</p> <p>The collections are of national and</p>		No, I do not wish to participate at the oral examination	

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													<p>international importance as a record of the history and culture of filmmaking and television production, and as a record of the contemporary life of the UK from the late 19th century to the present.</p> <p>They are an unparalleled resource for researchers, students, filmmakers and television producers, historians and any interested member of the public.</p> <p>The BFI supports the Core Strategy as we look to securing Major Developed Site Status within the Green Belt, to ensure our future at our Kingshill Way Site. Having this designated status would allow us to 'future proof' our site with some 'infill development' for expansion of the National Collections and a provision to replace our temporary buildings.</p> <p>Our most recent plans allow for moving Master Film Material to our new Film Store at Gaydon, in order to secure this important element of the Collections in a Sub Zero humidity controlled environment, which gives us the opportunity to relocate some of our other Collections to Berkhamsted.</p> <p>As part of our current Archive Modernisation Strategy we will be remodelling one of our Acetate Vaults to receive 'mixed media' which will also allow us to expand our Special Collections (Film &amp; Television Paper related Collections) as well as absorb part</p>			

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													<p>of the BFI Film Library. This in turn makes accessing the Collections for Research purposes much simpler and fits well with the provision of a New Research Area at Berkhamsted.</p> <p>The BFI employ around 100 staff both directly and indirectly which in itself benefits the local economy. Other than local employment we do utilise the services of many local businesses within Dacorum. We also use the service of Caterers, Specialist Removers, Decorators, Electrical Contractors, Builders, Grounds Maintenance contractors and Courier services.</p> <p>The BFI engages with the local community in various ways but primarily through our involvement with the Rex Cinema. We currently provide several films each month which are quite often projected by a BFI member of staff. We have also provided our Boardroom for use by local groups such as Dacorum Borough Council's 'Housing Options Project' and the reformation of Berkhamsted Football Club following their demise in 2009. We also engage with community groups and Schools locally by way of organised visits and Work experience.</p> <p>September this year saw the start of a series of 'Heritage' Open Days giving an insight into the BFI National Archive to members of the</p>			



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													General Public.  We also plan to create a Research area within the Conservation Centre.			
610088	Mr Martin Hicks	HBRC				Green Belt	Monitoring/Delivery	Policy CS 5	Objecting	No	b) Effective	Delivery of Environmental improvements in the Green Belt would not be achieved by CMS if they were not supported by DBC. Also, CMS could also help to deliver locally important benefits from projects not only related to development within the Green Belt.  The 'Rural Area' contains many uses which are equally applicable to the Green belt - indeed, the character of the Green Belt is largely dependant on them. Agriculture, forestry, countryside recreation and farm diversification are all related to managing the majority of open land wherever it is found. There should be no impression that this should only be acceptable in 'rural area' beyond the Green Belt (which also implies the Green Belt is not rural?). Whilst Green Belt may be protected from 'development' its character can degrade markedly if subject to poor or inappropriate land use - whilst remaining largely 'open'.	If DBC are not prepared to support or enable partner organisations to undertake work, they should not be specifically referred to as this creates an unrealistic expectation of delivery. I support their inclusion if they are to be funded.  Revise para 8.30 to reflect this - land uses including agriculture, forestry, countryside recreation and farm diversification are also important in maintaining the Green Belt.	No, I do not wish to participate at the oral examination		
488516	mr Hugh siegle					Green Belt	CS 5	Policy CS 5	Supporting	Yes	Yes	c) Consistent with national policy	I strongly support		No, I do not wish to participate at the oral examination	
611253	Mr B	New Gospel Hall Trust	479603	Mr John	J & J Design	Green Belt	CS5	Policy CS 5	Objecting	Yes	No	c) Consistent with national	National Policy as set out in the Growth Plan, the draft NPPF and the 2011 Autumn Statement all points to a less prescribed and more	Delete "designated Major Development Sites" from the final sentence and inset "previously developed site (excluding	Yes, I wish to participate at the oral	To ensure that the Inspector is fully informed on the need for the Core

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	Moffitt			Shephard								policy	flexible approach to spatial planning. In the case of the Green Belt paragraph 133 of the draft NPPF retains the objectives of Green Belt. However a more flexible approach to previously developed sites is set out in paragraph 144, without requiring MDS status.	temporary buildings)".	examination	Strategy to be compliant with current government policy and the potential for redevelopment of previously developed sites in the Green Belt for social infrastructure including places of worship.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Green Belt	CS5	Policy CS 5	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective or Consistent with national policy.  Pages 61 and 62 - Policy CS5: The Green Belt should have been comprehensively reviewed since it is already acknowledged that some Green Belt land will be required and more will be required to meet the shortfall in housing land. Green Belt should be reviewed when Local Plans are prepared especially where, in situations such as this, the Borough are intending to release Green Belt sites. This represents the exceptional circumstances required in PPG 2 and would allow the relative merits of such boundary changes to be examined.	The Green Belt and its boundaries should be comprehensively reviewed since it is already acknowledged that some Green Belt land will be required and more will be required to meet the shortfall in housing land. Green Belt should be reviewed when Local Plans are prepared especially where, in situations such as this, the Borough are intending to release Green Belt sites. This represents the exceptional circumstances required in PPG 2 and would allow the relative merits of such boundary changes to be examined.	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms of housing provision which is fundamental to the Plan as a whole. Also the merits of the Nash Mills site and the relative merits of other boundary changes or allocated sites will need to be examined orally.
211062		Banner Homes Limited	618743	Mr Les West	Barton Willmore	Green Belt	CS5	Policy CS 5	Objecting	Yes	No	a) Justified	It is not Justified or Consistent with national policy.  The preparation of the Core Strategy for Dacorum to cover the period 2006-2031 is the appropriate time to re-assess the green belt boundary in the light of the existing guidance in PPG 2 Green Belts. The site at Lockfields, Northchurch has been considered a number of times by the Council and also by the	A review of the Green Belt boundary relating to the Lock Field site should be undertaken.  Considering the proximity of the railway line and surrounding residential properties the contribution of the site as a Green Belt designation is limited. A more effective Green Belt boundary would be	Yes, I wish to participate at the oral examination	In order to be able to provide further written and oral evidence to the Inspector.

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													<p>Local Plan Inspector and there has never been any suggestion that it should not be developed because of its contribution to the purposes of including land in Green Belts. It does not contribute to maintaining separation from nearby settlements such as Bourne End and Dudswell.</p> <p>Given the planning history of the consideration of this site it seems entirely appropriate for it to be removed from the Green Belt now whether or not the Council intend to allocate the site for residential development.</p> <p>It is considered the Core Strategy in respect of policy CS5 Green Belt is not properly 'justified' nor is it 'consistent' with guidance in PPG 2.</p> <p>Further details are provided in Barton Willmore's accompanying report.</p>	located to the north of the railway line. The Council previously considered the loss of this Green Belt site acceptable. Further details are provided in Barton Willmore's accompanying report.		
211068	Mr Nick Harper	The Crown Estate	210968	Ms Helena Deaville	AMEC	Green Belt	CS5	Policy CS 5	Objecting	Yes	No	a) Justified	<p>The Core Strategy is considered to be unsound in that the evidence base in relation to the Green Belt is not justified. Paragraph 8.28 of the Submission document states that a strategic review of Green Belt boundaries is not required, although some small scale releases will be necessary to meet</p> <p>specific local needs or to correct minor anomalies. It is agreed that a strategic review of Green Belt boundaries would not be required for correcting anomalies or for small scale releases. However, the Core Strategy identifies local allocations at West Hemel Hempstead</p> <p>(up to 900 dwellings) and Marchmont Farm (300 dwellings) which are both located in the Green Belt. These, and in particular the former, are considered to be more</p>	<p>It is considered that a strategic Green Belt review, based on the five purposes of including land in Green Belts as set out in PPG2 needs to be undertaken for all areas of the Green Belt around the edge of the urban area prior to submission of the Core Strategy. This should be a joint review with St. Albans given the tightly drawn Green Belt boundary around Hemel Hempstead. The review should consider the need to ensure that boundaries do not need to be revised within the plan period or in the period beyond. This evidence needs to be considered along with other evidence relating to the sustainability of sites, landscape sensitivity and development requirements on Green Belt sites before the Core Strategy can</p>	Yes, I wish to participate at the oral examination	The Crown Estate is a significant landowner in the area, owning the majority of land between the eastern edge of Hemel Hempstead and the M1, and the Gorehambury Estate beyond. The Crown Estate has worked closely with Dacorum Borough Council in the past through promoting its land as a new mixed use community to the east of Hemel Hempstead. The Crown Estate is

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													<p>than just small scale releases and as such a strategic review of Green Belt sites should have been undertaken to identify the contribution that different sites make to the five Green Belt purposes as set out in paragraph 1.5 of PPG2. Green Belt sites have been identified as local allocations in the Core Strategy and therefore a Green Belt review should be undertaken prior to submission of the Core Strategy. This should not be left until the Site Allocations document is prepared as the local allocations have already been identified in the Core Strategy. Given the very tight Green Belt boundary around Hemel Hempstead, a joint Green Belt review with St. Albans should be undertaken to ensure that the Green Belt is assessed comprehensively.</p> <p>In accordance with PPG2, paragraph 2.12, the review needs to consider a timescale longer than the plan period in order to ensure that boundaries do not need to be reviewed within the plan period or in the period beyond.</p> <p>The Green Belt review should not in itself determine which sites are allocated, but needs to be considered as part of a suite of evidence base documents to determine the most suitable locations for development taking into account a range of factors including sustainability, landscape sensitivity and Green Belt development requirements. This approach accords with</p> <p>PPS12: Local Spatial Planning which requires that evidence that the choices made by the plan are backed up by the background facts</p>	<p>identify larger Green Belt sites (referred to in the Core Strategy as local allocations) for development. This would accord with the need for decisions to be evidence based as set out in paragraph 4.37 of PPS12.</p> <p>If a strategic Green Belt review is not undertaken as part of the Core Strategy development, then a Green Belt review should at least be undertaken as part of the East Hemel Hempstead AAP.</p>		<p>concerned that there is insufficient evidence specifically relating to how all areas of land on the urban edge meet the five purposes of being included in the Green Belt (as set out in PPG2 and which are also included in the Draft National Planning Policy Framework). In particular it considers that its land to the east of Hemel Hempstead is more suitable for release from the Green Belt than other sites, as it makes a very limited contribution to the five PPG2 Green Belt purposes.</p>

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													<p>(paragraph 4.37).</p> <p>Whilst the RSS14 policy relating to the need for a Green Belt review at Hemel Hempstead was quashed, this policy was never 'repaired', resulting in a policy gap. This does not mean that no review is required, but that it will be up to Dacorum to determine if a review is required, in light of development requirements and the need for Green Belt releases in the plan period and in the period beyond (PPG2, paragraph 2.12).</p> <p>It is recognised that the Assessment of Local Allocations and Strategic Sites documents (October 2010) considers 'Green Belt impact' as Stage 2 in its assessment, but this only considers those sites that have not been discounted at previous stages, and does not include land to the east of Hemel Hempstead, which when considered against the five purposes of</p> <p>including land in the Green Belt scores very well in terms of suitability for release, and it also has a very clear robust boundary, the M1. Any Green Belt assessment needs to cover the whole area around Hemel Hempstead including land in adjoining authorities.</p> <p>The Green Belt at west Hemel Hempstead is considered to be relatively sensitive and there are other locations such as east Hemel Hempstead which are considered to be much less sensitive, with robust long term boundaries and which make a limited contribution to the five PPG2 Green Belt purposes.</p> <p>The preliminary findings of the St. Albans Proactive Green Belt study</p>			

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												<p>as reported in the St. Albans Planning Policy Advisory Meeting Agenda of 16 September 2010 indicate that the land at North East Hemel Hempstead scores well in terms of release from the Green Belt.</p> <p>An example of a recent Inspector's view at South Gloucestershire is relevant. The Inspector put the Core Strategy Examination on hold to enable the local planning authority to undertake further work including a full Green Belt assessment. The Inspector's view was that changes to the Green Belt need to be taken in the context of an overall understanding of the future role of the Green Belt in the area and that full assessment is required so that there is no need to change boundaries during the remainder of the plan period or for a reasonable period beyond (in accordance with paragraph 2.12 of PPG2: Green Belts and the draft NPPF). The Inspector also noted that the review was required to demonstrate why those particular areas identified for removal from the Green Belt are more appropriate than others.</p> <p>Please also refer to The Crown Estate's representations regarding the assessment of alternative sites/consideration of alternatives as this is also relevant to the Green Belt review issue.</p>				
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Green Belt	CS5	Policy CS 5	Objecting	Yes	No	c) Consistent with national policy	As GUI identifies throughout their planning evidence, there is a need for considering Green Belt land release at Berkhamsted to the south of the town in order to meet the town's projected housing demand within the CS plan period in a	No particular policy recommendations are put forward in relation to draft Policy CS5. It is for DBC to determine how they address issues of Green Belt Review in the context of meeting a pressing	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future

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													<p>sustainable manner.</p> <p>PG2 acknowledges that Green Belt boundaries defined in adopted local plans should be altered only exceptionally. A pressing local housing need represents one of these exceptional circumstances.</p> <p>It is also important to note that DBC identifies Ashlyns Secondary School and the British Film Institute (BFI) as two Major Development Sites (MDSs) in the Green Belt within the Pre-Submission CS. The "Local Allocation" at Hanburys is also recognised as a preferred development option for the town within this southern location where built education and recreational development already exists. These aspects set a precedent for considering further sustainable development at this southern location of the town where the A41 forms a logical boundary for a new urban extension.</p> <p>These are considerations DBC must take on board in their review of Green Belt Policy within their draft CS Plan.</p>	housing need across the borough and Berkhamsted within the plan period.		development growth across the borough and at Berkhamsted.
611657	Messrs M&D Gardener		611650	Mr John Heginbotham	Stimpsons	Green Belt	CS5	Policy CS 5	Supporting	Yes	Yes		As Representation on behalf of Taylor Wimpey by Martin Friend	As Representation on behalf of Taylor Wimpey by Martin Friend	Yes, I wish to participate at the oral examination	Our client's land is a significant component of LA3
617777	Maggie Campbell		617775	Mr James Pitt	Gleeson Strategic Land	Green Belt	CS5	Policy CS 5	Supporting	Yes	Yes		Whilst we support the intention to protect the Green Belt as identified within policy CS5, we believe a flexibility must be incorporate to allow other sites to come forward should deliverability of any of the selected development sites fail, or if a need for further sites is recognised due to an increased housing requirement. For example		No, I do not wish to participate at the oral examination	

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													should proposal LA6 (Chesham Road, Bovingdon) not occur as anticipated, or if indeed the deliverability of previously developed land does not occur at the rates anticipated by the council there needs to be the ability within the policy to allow alternative sites to come into the strategy to ensure that the Core Strategy remains deliverable.			
619043	Hertfordshire County Council	Hertfordshire County Council	618059	Mrs Ruth Gray	Vincent & Gorbings	Green Belt	CS5	Policy CS 5	Objecting	Yes	No		<p>Kings Langley Secondary School has identified the need to improve existing educational facilities at the school as many of the buildings are 'not fit for purpose'. The County Council has also identified a possible need to expand the school to provide additional secondary school places in Kings Langley to meet the longer term needs.</p> <p>The school is identified in the Adopted Local Plan as a Major Developed Site in the Green Belt and as such development will only be allowed inside the defined infill development area (subject to specific criteria). The infill development area is tightly drawn around existing buildings and some new building has taken place outside the envelope in recent years.</p> <p>In order to facilitate improved education facilities at the school, allow</p> <p>flexibility for expansion to meet longer term educational needs, and to reflect the current support by Dacorum Borough Council in the emerging Core Strategy, it is recommended that the boundary of the infill development area be reviewed to allow sufficient room for the</p>			



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													improvements to take place without the need for a special circumstances case to be made every time development is proposed.			
620224	Mr Stephen Harris	Emery Planning Partnership				Green Belt	CS5	Policy CS 5	Objecting	No	No	c) Consistent with national policy	<p>Given the reliance on local allocations in the Green Belt, the Council should consider a review of its Green Belt and consider providing either allocated sites or safeguarded land in its Core Strategy. Tring is a good example of why the Core Strategy is not sound on this issue. This is because Tring is constrained on all sides by Green Belt. There is limited urban capacity and any development needs above that level of urban capacity requires Green Belt releases. As Tring is constrained by the Green Belt paragraphs 2.8 and 2.12 of PPG2 are of relevance. Paragraph 2.8 advises:</p> <p>"If boundaries are drawn excessively tightly around existing built-up areas it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of the Green Belt and reduce the value of local plans in making proper provision for necessary development in the future."</p> <p>Paragraph 2.12 then advises:</p> <p>"When local planning authorities prepare new or revised structure and local plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan. They should satisfy themselves that Green Belt boundaries will not need</p>		Yes, I wish to participate at the oral examination	Please see attached

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													<p>to be altered at the end of the plan period. In order to ensure protection of Green Belts within this longer timescale, this will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer-term development needs. Regional/strategic guidance should provide a strategic framework for considering this issue. In preparing and reviewing their development plans authorities should address the possible need to provide safeguarded land. They should consider the broad location of anticipated development beyond the plan period, its effects on urban areas contained by the Green Belt and on areas beyond it, and its implications for sustainable development. In non-metropolitan areas these questions should in the first instance be addressed in the structure plan, which should where necessary indicate a general area where local plans should identify safeguarded land."</p> <p>The above guidance has clearly not been taken into account by the Council, particularly around Tring. Even to meet the requirement in the Core Strategy all the urban capacity sites and the proposed allocation will have to come forward. We do not doubt that the</p> <p>proposed allocation west of Tring will not come forward although we have significant reservations on the urban capacity sites. Even if they do any further development within the plan period or beyond will require additional Green Belt releases. This will require additional land to be identified. If additional allocations are not made, the only way this can be achieved in accordance with national policy is by safeguarding</p>			

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													land. The Council in our view cannot satisfy themselves that Green Belt boundaries will not need to be altered before or at the end of the plan period, as Tring will inevitably require further development.  We therefore propose that the Waterside Way site, if it is not identified for development, is identified as safeguarded land.			
211660	Mr Garrick Stevens	Berkhamsted Town Council				Green Belt	CS 5	Policy CS 5	Supporting	Yes	Yes		Green Belt Support		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
494131	Mr Michael Emmett	CALA Homes				Green Belt	CS5	Policy CS 5	Objecting	Yes	No	a) Justified	It is unsound because it is not Justified or Effective.  This policy, and its supporting text, is considered to represent a somewhat half-hearted recognition that green belt boundary adjustments will be required. Paragraph 8.28 mentions that some small scale releases will be necessary, however it is contended that such releases are required now and that they should be explicitly proposed in the CS. It is therefore suggested that the locations already identified elsewhere in the CS (namely the local allocations in Table 9) are referred to in Policy CS5 as proposed green belt releases and key diagram is amended accordingly to illustrate the amended boundaries.	Amend green belt boundary to release all allocated sites. Rework Policy CS5 and amend key diagram accordingly.	Yes, I wish to participate at the oral examination	CALA Homes has a controlling interest in the Icknield Way Tring Local Allocation and as such has an important role to play in delivering a key element of the Core Strategy.
494847		Trustees of Drayton Beauchamp Parochial Charities	626780		Cole Flatt & Partners	Green Belt	CS5	Policy CS 5	Objecting	Yes	No		Green Belt (Policy CS5)  This Policy, and its supporting text, is considered to represent a somewhat half-hearted recognition that green belt boundary	refer to response to question 4 above	No, I do not wish to participate at the oral examination	

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													<p>adjustments will be required. Paragraph 8.28 mentions that some small scale releases will be necessary, however it is contended that such releases are required now and that they should be explicitly proposed in the CS. It is therefore suggested that the locations already identified elsewhere in the CS (namely the local allocations in Table 9) are referred to in Policy.</p> <p>Policy CS1- Distribution of Development specifically refers to Berkhamsted and Tring as Second Tier settlements capable of meeting Boroughs Housing needs. In the case of Tring, and significant Housing Numbers will require the release of Green Belt land.</p>			
498388	Bill Ashburner		398601	Mr Laurence Quail	JB Planning Associates	Green Belt	CS5	Policy CS 5	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p><b>Summary</b></p> <p>Policy CS5 is primarily a repetition of national policy, and such alterations/additions to national policy as are included are not based upon any local evidence. The majority of the policy is therefore unjustified (where it attempts to alter national policy) and contrary to national policy (because of the inappropriate repetition of national policy).</p> <p>The Policy should recognise that certain previously developed sites will come up for redevelopment during the Plan period and in the current climate housing may be required to make schemes viable.</p> <p>The current policy either needs to fully reflect current national guidance or set out justified local</p>	<p><b>Proposed Amendments</b></p> <p>If the policy is retained it at the very least needs to include reference to applications being determined on their own merits and given the necessary very special circumstances.</p>	Yes, I wish to participate at the oral examination	The application of Green Belt policy is an important element of the development strategy outlined in the draft Core Strategy, and we wish to have the opportunity to take part in the discussion at the Examination over the document's soundness as drafted, and how it might be amended.

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													<p>policy.</p> <p><b>Representation</b></p> <p><b>Soundness</b></p> <p>On all counts, the Policy is Unsound, because it repeats national guidance (contrary to national guidance), amends national guidance without justification, and the resultant confusion will render the Policy ineffective.</p>			
625652		Berkhamsted School	625654	Mr Peter Dines	Gerald Eve LLP	Green Belt	CS5	Policy CS 5	Supporting	Yes	Yes		<p>Support is expressed regarding the Council's approach to Green Belt, proposed by draft Policy CS5, as it is considered to be the correct approach to provide a suitable level of protection of the Green Belt, whilst allowing suitable sites in sustainable locations to come forward for development, in the event that sites are required for the Council to meet its challenging housing requirement over the plan period.</p> <p>Whilst concern is expressed regarding the lack of strategic sites proposed for new housing, it is considered that the framework for urban extensions provided by draft policies CS2 and CS3, in conjunction with draft Policy CS5, set an appropriate policy context for the forthcoming Site Allocations DPD to identify sites in the Green Belt that are suitable and capable of coming forward for future development.</p> <p>In accordance with Berkhamsted's status as a town second in the Borough's settlement hierarchy it is required to accommodate some 1,180 new homes by 2031. Concern is raised regarding the fact that there are only two allocations for the</p>	No change sought.	No, I do not wish to participate at the oral examination	

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													<p>town identified in the Core Strategy, which are able to deliver only an estimated 240 homes and in light of this situation, it is important that the Borough's development plan policies allow for sufficient sites to come forward for residential development during the plan period.</p> <p>Previously-developed sites such as Haslam Field, Shootersway, Berkhamsted have the potential to deliver housing to meet the Borough's needs over the plan period in sustainable locations. Following the intended re-provision of playing fields, this site will become surplus to requirement and so will have the potential to deliver new homes either in isolation, or as part of a larger urban extension together with land to the East during the plan period.</p> <p>Draft Policy CS5, together with draft policies CS2 and CS3, sets out a strategic approach to allow limited urban extensions through small-scale Green Belt boundary changes in accordance with National Planning Policy. It is also considered to be 'justified' given the uncertainty at this stage as the ability of settlements including Berkhamsted to accommodate their associated housing requirement within their existing boundaries. The policy approach is also considered effective, by being sufficiently flexible in setting the broad parameters for the Site Allocations DPD to identify sites to come forward to deliver new housing.</p>			
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners	Green Belt	CS5	Policy CS 5	Objecting	No	b) Effective	Green Belt (Policy CS5)	Green Belt (Policy CS5)	Refer to response to question 4 above	No, I do not wish to participate at the oral examination	

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													<p>adjustments will be required. Paragraph 8.28 mentions that some small scale releases will be necessary, however it is contended that such releases are required now and that they should be explicitly proposed in the CS. It is therefore suggested that the locations already identified elsewhere in the CS (namely the local allocations in Table 9) are referred to in Policy.</p> <p>Policy CS1- Distribution of Development specifically refers to Berkhamsted and Tring as Second Tier settlements capable of meeting Boroughs Housing needs. In the case of Tring, and significant Housing Numbers will require the release of Green Belt land.</p>			
627495	Mr Nigel Agg	TAYLOR WIMPEY UK LTD	210999	Mr Martin Friend	Vincent & Gorbing	Green Belt	CS 5	Policy CS 5	Supporting	Yes	Yes		<p>Taylor Wimpey support Policy CS5 Green Belt. This clarifies that although</p> <p>no general review of the Green Belt is proposed, the Local Allocations, including the land at West Hemel Hempstead which is presently within the Green Belt, will be permitted.</p> <p>In effect, the Core Strategy sanctions the removal of the land from the Green Belt, but manages it as such (footnote 3 to Policy CS3) until such time as development is permitted. It is accepted that detailed Green Belt boundaries will be established in relation to the Local Allocation in the Site Allocations DPD.</p>		Yes, I wish to participate at the oral examination	As an experienced housebuilder, Taylor Wimpey wish to appear at the examination to assist the inspector in considering the soundness of the overall development strategy, housing requirements and provision and the LA3 Local Allocation.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Green Belt	CS 5	Policy CS 5	Supporting	Yes	Yes		<p>This comment relates to Policy CS5: Green Belt. It states that the Green Belt will be protected and that there will be no general review of the Green Belt Boundary, but that the identified Local Allocations will be permitted to be released for</p>		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing

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													development  In relation to this policy, it is our client's view that it would be preferable to exclude the relevant Local Allocations from the Green Belt at this time, given their comments relative to certainty, timing and deliverability of development on these sites. However, our client recognises the Council's approach and is supportive, in overall terms, to Policy CS5.			delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
627695	Mr W Cleeve	Hogarth Properties	627696	Mr Tim Waller	JB Planning Associates	Green Belt	CS 5	Policy CS 5	Objecting	Yes	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  <b>Summary</b>  Policy CS5 is primarily a repetition of national policy, and such alterations/additions to national policy as are included are not based upon any local evidence. The majority of the policy is therefore unjustified (where it attempts to alter national policy) and contrary to national policy (because of the inappropriate repetition of national policy).  <b>Representation</b>  National policy in PPS12 makes clear that Development Plan Documents should not simply re-iterate national policy. To do so adds unnecessarily to their length and complexity, potentially creates confusion when local policy attempts to repeat national policy	Delete policy CS5, with the possible exceptions of the third and fourth clauses (relating to the general extent of the Green Belt boundary and cross reference to its application at selected small villages).  <b>Proposed Amendments</b>  As Policy 6 of the Local Plan can be seen to have been failing to provide new affordable housing in these villages, Policy CS6 must take a more flexible approach if it is truly to be able to deliver affordable housing, and other development, which will meet 'local needs'. We suggest the inclusion of the following clause into the policy:  <b>(g) residential development for sale on the open market, where this will help to deliver affordable housing or other facilities for which there is a</b>	Yes, I wish to participate at the oral examination	<b>The application of Green Belt policy is an important element of the development strategy outlined in the draft Core Strategy, and we wish to have the opportunity to take part in the discussion at the Examination over the document's soundness as drafted, and how it might be amended.</b>



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													<p>but uses different terminology, and creates conflict if national policy changes.</p> <p>The first clause of Policy CS5 is a needless statement to the effect that national policy will be applied.</p> <p>The second clause of CS5 sets out types of small scale development that will be allowed, but this is a confusing clause, because although on the one hand the opening clause of the policy says that national policy will be applied, this second clause of the policy is seeking in part to redefine elements of national policy.</p> <p>So for example, national policy allows for appropriate facilities for outdoor sport and recreation, but this does not fall within any of parts (a), (b), or (c) of the second clause. So are sports facilities allowed because the first clause of the policy says that national Green Belt policy will be strictly applied, or not allowed because they are not mentioned in parts (a)-(c) of the 2<sup>nd</sup> clause?</p> <p>In respect of part (b), national policy allows for the replacement of existing buildings, not just houses, and it does not limit this to a 'like for like basis' as Policy CP5 suggests, but on the basis that it is "not materially larger", which is not the same test. The draft NPPf contains similar provisions. So, would a replacement commercial building that is not materially larger be permitted, because of the strict application of national policy, or would it be refused, because it is not the replacement of a house on a 'like for like' basis?</p>	<p><b>proven local need.</b></p> <p>We also suggest that Policy CS6 should encourage the use of Council land and facilities to help deliver new development which will meet proven local needs, such as by providing a site for affordable housing which is to be funded by financial contributions from other development sites. We believe it would be appropriate to include a statement to this effect within the policy.</p>		

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													<p>In respect of (c), national policy also allows for the limited extension (and alteration) of buildings, but limits this to extensions that are not disproportionate to the original building. Part (c) does not refer to the original building.</p> <p>The additional sub-clauses (i) and (ii) that follow parts (a)-(c) appear to add extra criteria for the determination of applications in the Green Belt. However, part (i) in respect of impact on the character and appearance of the countryside is a generic design criteria that would apply to any development, irrespective of Green Belt policy, and is appropriately dealt with under other Core Strategy policies (e.g draft Policy CS25) and through detailed design policies. The second criterion under part (ii) is unclear as to its application, since it only applies "where relevant". So presumably, a replacement of a residential building with a residential building would not fall to be considered in respect of criterion (ii), since it would not be relevant. However, for a commercial proposal, the criterion would be relevant, but almost by definition the development would be likely to comply. We are also unclear as to what "maintenance of the countryside" involves. So it is not clear what the purpose of the second criterion actually is, or what it is seeking to achieve.</p> <p>There are therefore a number of subtle differences between Policy CP5 as drafted and national policy, which creates an inherent contradiction in the Policy, since it is not clear whether national policy is being applied, or some local variant of national policy (and if the latter, where is the justification for those</p>			

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													<p>variations?).</p> <p>The third and fourth clauses of the policy do appear to have some form of strategic purpose, with the third clause explaining that no amendments to the boundary are proposed, except as may be provided by Policies CS2 and CS3 (have exceptional circumstances to justify such revisions be shown?), whilst the fourth clause provides some context for subsequent Policy CS6.</p> <p>The fifth clause, which says that applications on Major Developed Sites will be determined in accordance with national policy, adds nothing.</p> <p>In essence, therefore, Policy CS5 is a confusion of (a) repeated elements of national guidance and (b) amendments to national guidance not supported by local evidence, which combine to create uncertainty as to whether national policy is actually being applied, or some local variation of it.</p> <p>As drafted, Policy CS6 represents a more restrictive version of Policy 6 of the current Local Plan, precluding the possibility of infill market housing being built in the selected small villages in the Green Belt, and its supporting text gives a more restrictive definition of where infill development may be located. The Inspector's report into the current Local Plan considered these issues in detail, and the Inspector's conclusions contradict the approach taken in the draft Policy CS6. The Council's evidence base does not set out the reasons as to why they have chosen to make this policy more restrictive, or their justification</p>			

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													<p>for doing so. Policy CS6 is currently too restrictive and inflexible, and is not sound because it will fail to meet 'local needs'.</p> <p>Policy CS6 has been drafted so as to preclude market housing from coming forward in the small villages within the Green Belt, where infill opportunities exist within these villages. The Policy specifies that infill housing should be 'affordable' and 'for local people', and this is echoed in paragraph 8.34. This issue was previously considered in relation to Policy 6 of the Local Plan (referred to as Policy 4 in the Local Plan Inspector's Report). The Inspector considered that representations suggesting only affordable housing should be permitted in these villages were not justified or reasonable. He concluded that the requirement for new housing to meet a 'local need' provided sufficient restriction to prevent normal market housing development from coming forwards in most circumstances, but did not preclude such development, where it might satisfy the 'local need' test.</p> <p>In terms of market housing which would be consistent with the 'local needs' test, the Inspector noted that, in addition to housing for agricultural workers or 'to provide affordable housing', market housing may for instance be required for people employed by a local business (IR, para 4.42.11). He noted that the appropriateness of market housing is 'best assessed at the time, rather than being ruled out at this stage', and it was neither necessary nor appropriate to preclude the provision of affordable housing. He noted:</p>			

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													<p>'I consider it is appropriate for Policy 4 to maintain a degree of flexibility at the local level. Although it may be difficult to establish that open market housing will meet a genuine local need, I do not believe this should be ruled out in principle.' (IR 4.42.11)</p> <p>The same reasoning is relevant with regard to the current draft policy. The Inspector's conclusions were drawn in relation to the advice in PPG2, which is the national planning policy document against which the current draft policy must be considered. PPG2 does not require all infill development to be for affordable housing, but by inference allows for market housing. PPG2 also says that policies should ensure that any infilling should not have any adverse effect on the character of the village concerned, and this point is covered by point (i) of the draft Policy.</p> <p>We have experience of the way in which the council have interpreted the policy in the determination of planning applications, and they have been clear that the 'local need' clause prohibits most market housing, while accepting that it may be permitted in exceptional circumstances which help to serve a local need, such as through helping to provide affordable housing. In fact, our experience of the interpretation of Policy 6 of the Local Plan, is that it has caused confusion and inconsistent decision making. This is principally related to the Council's interpretation of 'local need'. While this may have been intended to relate to a number of different issues at the time of the adoption of the Local Plan, it has increasingly been considered to</p>			

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													<p>relate only to the provision of affordable housing. This change in thinking is evident through the Council's proposed changes to the revised Policy CS6, which changes the previous clause concerning residential infilling to meet a proven local need to a simplified clause relating to 'affordable housing for local people.'</p> <p>However, despite this change in emphasis, the Local Plan policy has failed to deliver any significant amount of affordable housing, and therefore generally failed to meet local needs due to its inflexible interpretation. The Council's Annual Monitoring Report (AMR) for 2009/10 shows that the provision of affordable housing within the District has consistently been below the Council's target, set in the East of England Plan. The AMR 2009/10 records that 685 affordable dwellings have been completed since 2001, against a requirement for 1,125, leaving a cumulative shortfall of 440 dwellings to date. Appendix 3 of this AMR lists the affordable housing developments which have recently been completed (96 dwellings), those which are currently under construction (80 dwellings), and those which either have planning permission (278 dwellings), or which it is speculated may come forward for development (369 dwellings). Out of all of these figures, only 6 dwellings, on a small site in Chipperfield, are to come forward in one of the selected small villages in the Green Belt. This site is being brought forward by a Housing Association, as a rural exception site. It is therefore clear that the current Policy 6 does not promote affordable housing to meet local needs, as none of the houses listed</p>			

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													<p>in the AMR are coming forward under its provisions. However, despite this, the draft policy is even more restrictive with regard to market housing, which is one of the few means by which affordable housing could be delivered in these villages.</p> <p>A new policy must therefore be designed to overcome the failure of the previous policy to meet local needs, and to provide affordable housing. When looking to design a new policy, which can deliver affordable housing to meet the local needs of these villages, it is important to consider the mechanisms by which affordable housing will be delivered in the future. The Government have recently cut funding for affordable housing so dramatically that the number of new starts on affordable housing developments at a national level dropped from 35,735 between October 2010 and March 2011, down to 454 between April and September 2011<sup>1</sup>, a 99% fall. The Government's intention is for affordable housing to be delivered through their new affordable rent scheme, with housing associations funding and building housing on the basis of rents paid through the benefits system of up to 80% of the normal market rent. This system is still unproven, and its implementation is the reason for the recent hiatus in affordable house building. Housing associations are understandably concerned about the increased financial risks they will be expected to bear under the new system, and there is uncertainty over the number of houses which may be delivered by the new system. At the same time, the Government has cut its grant funding, the means by which the</p>			

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													<p>majority of affordable housing was delivered until recently, by around 65% /0, and we understand that little or no grant funding remains nationally for the period up to 2015.</p> <p>Given the cut in funding, and the uncertainty over the new system, it is likely that, if any significant amount of affordable housing is to be built in the next four years, and beyond, a significant financial contribution will still be required from market housing developments. Market housing can help to deliver affordable housing both through on-site provision in new developments, and through financial contributions to off-site developments.</p> <p>We believe it is important for Policy CS6 to have sufficiently flexible to allow infill development that will meet local needs. Where this will mean market housing which can help to fund affordable housing, the Policy must allow for this. As we have noted, the existing Local Plan policy was amended by the Inspector to allow for market housing to be provided, where this would help to meet a local need, which includes the provision of affordable housing. Given the recent difficulties experienced in delivering affordable housing nationally, and the unproven nature of the Government's new system, it is only sensible to allow flexibility within the replacement policy, to allow it to be effective, and to deliver the housing which local people need.</p> <p><b>Delivering Local Facilities</b></p> <p>We note that Policy CS6 has been drafted to allow for the delivery of 'local facilities to meet the needs of the village'. We would speculate that</p>			



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													<p>the need for such facilities may be identified through a neighbourhood plan, or through the village appraisals referred to in paragraph 8.33 of the draft Core Strategy. They might include, for instance, a new church hall or new sports facilities. However, the funding mechanisms for these facilities is unclear, and it is our experience that market housing is often required to deliver expensive new facilities of this nature.</p> <p>If a neighbourhood plan, which the recent Localism Bill has clarified would now be part of the development plan, were to specify the need for an expensive new facility, there is no indication in the draft policy or its supporting text of how this would be delivered.</p> <p><b>The Form and Location of Mill Development</b></p> <p>The supporting text for Policy CS6, at paragraph 8.34, also outlines a particularly restrictive approach to the definition on 'infill development'. We believe this definition is too restrictive and insufficiently flexible to meet the local needs of these villages in all cases, and this is an issue better left to the determination of individual planning applications.</p> <p>The Local Plan Inspector also considered this issue, and concluded that:</p> <p><b>'Turning to the location of the infill, while I appreciate the Council's desire to restrict insensitive "backland" developments, I consider limiting development to gaps in an otherwise built-up frontage is unduly restrictive. Many of the</b></p>			

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													<p>villages are characterised by a much more complex pattern of development, especially close to their core. Within this context new infill development could in some cases be accommodated on "backland" sites without detriment to the character of the village or to the openness of the Green Belt. In my opinion, clause (i), which requires development to be sympathetic to its surroundings, is a sufficient safeguard against poorly designed or visually damaging schemes. Consequently, I see no need for the additional limitation set out in clause (iii), which in my view imposes a potentially harmful rigidity on future infill schemes. I therefore recommend that the Plan be modified by the deletion of clause (iii).' (IR, 4.42.24)</p> <p>We agree with the Inspector's comments, and have seen no evidence to justify the revised approach taken in the draft Core Strategy. We suggest that the references to infill development should be removed from paragraph 8.34.</p> <p><b>Soundness</b></p> <p>As drafted, Policy CS6 and its supporting text is unsound because it is not justified. No evidence has been presented to explain the changes from Policy 6 of the Local Plan in relation to prohibiting market housing in infill developments, and the altered definition of infill development. The Inspector considering the Local Plan considered similar proposed changes to be overly restrictive, and contrary to the overall aims of the current Policy 6, as they would fail</p>			

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													<p>to meet local needs, and no evidence has been provided to show this is not still the case.</p> <p>The changes will also render Policy CS6 ineffective, as it will not generally be possible to deliver new development to meet local needs, whether this is affordable housing, pr other community facilities. The performance of Policy 6 of the Local Plan shows that it is already failing to provide affordable housing in these villages, and Policy CS6 will</p> <p>need to take a less restrictive approach to development if it is not to continue to fail to meet local needs. It should therefore permit limited market housing, where this will help to fulfil the aims of the policy by delivering development that will meet proven local needs.</p>			
6273 81	Mr Richard James		6273 79	Mr John Boyd	JB Planning Associates	Green Belt	CS 5	Policy CS 5	Objecting	Yes	No	a) Justified	<p><b>Summary</b></p> <p>Policy CS5 is primarily a repetition of national policy, and such alterations/additions to national policy as are included are not based upon any local evidence. The majority of the policy is therefore unjustified (where it attempts to alter national policy) and contrary to national policy (because of the inappropriate repetition of national policy).</p> <p><b>Representation</b></p> <p>National policy in PPS12 makes clear that Development Plan Documents should not simply re-iterate national policy. To do so adds unnecessarily to their length and complexity, potentially creates confusion when local policy attempts to repeat national policy but uses different terminology, and</p>		No, I do not wish to participate at the oral examination	

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													<p>to extensions that are not disproportionate to the original building. Part (c) does not refer to the original building.</p> <p>The additional sub-clauses (i) and (ii) that follow parts (a)-(c) appear to add extra criteria for the determination of applications in the Green Belt. However, part (i) in respect of impact on the character and appearance of the countryside is a generic design criteria that would apply to any development, irrespective of Green Belt policy, and is appropriately dealt with under other Core Strategy policies (e.g draft Policy CS25) and through detailed design policies. The second criterion under part (ii) is unclear as to its application, since it only applies -where relevant. So presumably, a replacement of a residential building with a residential building would not fall to be considered in respect of criterion (ii), since it would not be relevant. However, for a commercial proposal, the criterion would be relevant, but almost by definition the development would be likely to comply. We are also unclear as to what -maintenance of the countryside involves. So it is not clear what the purpose of the second criterion actually is, or what it is seeking to achieve.</p> <p>There are therefore a number of subtle differences between Policy CP5 as drafted and national policy, which creates an inherent contradiction in the Policy, since it is not clear whether national policy is being applied, or some local variant of national policy (and if the latter, where is the justification for those variations?).</p>			

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													<p>The third and fourth clauses of the policy do appear to have some form of strategic purpose, with the third clause explaining that no amendments to the boundary are proposed, except as may be provided by Policies CS2 and CS3 (have exceptional circumstances to justify such revisions be shown?), whilst the fourth clause provides some context for subsequent Policy CS6.</p> <p>The fifth clause, which says that applications on Major Developed Sites will be determined in accordance with national policy, adds nothing.</p> <p>In essence, therefore, Policy CS5 is a confusion of (a) repeated elements of national guidance and (b) amendments to national guidance not supported by local evidence, which combine to create uncertainty as to whether national policy is actually being applied, or some local variation of it.</p> <p><b>Soundness</b></p> <p>On all counts, the Policy is Unsound, because it repeats national guidance (contrary to national guidance), amends national guidance without justification, and the resultant confusion will render the Policy ineffective.</p> <p><b>Proposed Amendments</b></p> <p>Delete policy CS5, with the possible exceptions of the third and fourth clauses (relating to the general extent of the Green Belt boundary and cross reference to its application at selected small villages).</p>			

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6276 95	Mr W Cleeve	Hogarth Properties	6276 96	Mr Tim Waller	JB Planning Associates	Paragraph	8.34	8.34	Objecting	Yes	No	a) Justified	<p>It is unsound because it is not Justified or Effective, with national policy.</p> <p>As drafted, Policy CS6 represents a more restrictive version of Policy 6 of the current Local Plan, precluding the possibility of infill market housing being built in the selected small villages in the Green Belt, and its supporting text gives a more restrictive definition of where infill development may be located. The Inspector's report into the current Local Plan considered these issues in detail, and the Inspector's conclusions contradict the approach taken in the draft Policy CS6. The Council's evidence base does not set out the reasons as to why they have chosen to make this policy more restrictive, or their justification for doing so. Policy CS6 is currently too restrictive and inflexible, and is not sound because it will fail to meet 'local needs'.</p> <p>Policy CS6 has been drafted so as to preclude market housing from coming forward in the small villages within the Green Belt, where infill opportunities exist within these villages. The Policy specifies that infill housing should be 'affordable' and 'for local people', and this is echoed in paragraph 8.34. This issue was previously considered in relation to Policy 6 of the Local Plan (referred to as Policy 4 in the Local Plan Inspector's Report). The Inspector considered that representations suggesting only affordable housing should be permitted in these villages were not justified or reasonable. He concluded that the requirement for new housing to meet a 'local need'</p>	<p><b>Proposed Amendments</b></p> <p>As Policy 6 of the Local Plan can be seen to have been failing to provide new affordable housing in these villages, Policy CS6 must take a more flexible approach if it is truly to be able to deliver affordable housing, and other development, which will meet 'local needs'. We suggest the inclusion of the following clause into the policy:</p> <p><b>(g) residential development for sale on the open market, where this will help to deliver affordable housing or other facilities for which there is a proven local need.</b></p> <p>We also suggest that Policy CS6 should encourage the use of Council land and facilities to help deliver new development which will meet proven local needs, such as by providing a site for affordable housing which is to be funded by financial contributions from other development sites. We believe it would be appropriate to include a statement to this effect within the policy.</p>	Yes, I wish to participate at the oral examination	Policy CS6 is the key policy relating to development in the villages it names, and we are keen to ensure that the mistakes of the previous Policy 6 are not repeated, and that local needs can be met through the provisions of this policy. We therefore wish to have the opportunity to take part in the discussion at the Examination over the document's soundness as drafted, and how it might be amended.

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													<p>provided sufficient restriction to prevent normal market housing development from coming forwards in most circumstances, but did not preclude such development, where it might satisfy the 'local need' test.</p> <p>In terms of market housing which would be consistent with the 'local needs' test, the Inspector noted that, in addition to housing for agricultural workers or 'to provide affordable housing', market housing may for instance be required for people employed by a local business (IR, para 4.42.11). He noted that the appropriateness of market housing is 'best assessed at the time, rather than being ruled out at this stage', and it was neither necessary nor appropriate to preclude the provision of affordable housing. He noted:</p> <p><b>'I consider it is appropriate for Policy 4 to maintain a degree of flexibility at the local level. Although it may be difficult to establish that open market housing will meet a genuine local need, I do not believe this should be ruled out in principle.'</b> (IR 4.42.11)</p> <p>The same reasoning is relevant with regard to the current draft policy. The Inspector's conclusions were drawn in relation to the advice in PPG2, which is the national planning policy document against which the current draft policy must be considered. PPG2 does not require all infill development to be for affordable housing, but by inference allows for market housing. PPG2 also says that policies should ensure that any infilling should not</p>			



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													<p>have any adverse effect on the character of the village concerned, and this point is covered by point (i) of the draft Policy.</p> <p>We have experience of the way in which the council have interpreted the policy in the determination of planning applications, and they have been clear that the 'local need' clause prohibits most market housing, while accepting that it may be permitted in exceptional circumstances which help to serve a local need, such as through helping to provide affordable housing. In fact, our experience of the interpretation of Policy 6 of the Local Plan, is that it has caused confusion and inconsistent decision making. This is principally related to the Council's interpretation of 'local need'. While this may have been intended to relate to a number of different issues at the time of the adoption of the Local Plan, it has increasingly been considered to relate only to the provision of affordable housing. This change in thinking is evident through the Council's proposed changes to the revised Policy CS6, which changes the previous clause concerning residential infilling to meet a proven local need to a simplified clause relating to 'affordable housing for local people.'</p> <p>However, despite this change in emphasis, the Local Plan policy has failed to deliver any significant amount of affordable housing, and therefore generally failed to meet local needs due to its inflexible interpretation. The Council's Annual Monitoring Report (AMR) for 2009/10 shows that the provision of affordable housing within the District has consistently been below the Council's target, set in the East of</p>			

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													<p>England Plan. The AMR 2009/10 records that 685 affordable dwellings have been completed since 2001, against a requirement for 1,125, leaving a cumulative shortfall of 440 dwellings to date. Appendix 3 of this AMR lists the affordable housing developments which have recently been completed (96 dwellings), those which are currently under construction (80 dwellings), and those which either have planning permission (278 dwellings), or which it is speculated may come forward for development (369 dwellings). Out of all of these figures, only 6 dwellings, on a small site in Chipperfield, are to come forward in one of the selected small villages in the Green Belt. This site is being brought forward by a Housing Association, as a rural exception site. It is therefore clear that the current Policy 6 does not promote affordable housing to meet local needs, as none of the houses listed in the AMR are coming forward under its provisions. However, despite this, the draft policy is even more restrictive with regard to market housing, which is one of the few means by which affordable housing could be delivered in these villages.</p> <p>A new policy must therefore be designed to overcome the failure of the previous policy to meet local needs, and to provide affordable housing. When looking to design a new policy, which can deliver affordable housing to meet the local needs of these villages, it is important to consider the mechanisms by which affordable housing will be delivered in the future. The Government have recently cut funding for affordable housing so dramatically that the</p>			

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													<p>number of new starts on affordable housing developments at a national level dropped from 35,735 between October 2010 and March 2011, down to 454 between April and September 2011<sup>1</sup>, a 99% fall. The Government's intention is for affordable housing to be delivered through their new affordable rent scheme, with housing associations funding and building housing on the basis of rents paid through the benefits system of up to 80% of the normal market rent. This system is still unproven, and its implementation is the reason for the recent hiatus in affordable house building. Housing associations are understandably concerned about the increased financial risks they will be expected to bear under the new system, and there is uncertainty over the number of houses which may be delivered by the new system. At the same time, the Government has cut its grant funding, the means by which the majority of affordable housing was delivered until recently, by around 65%, and we understand that little or no grant funding remains nationally for the period up to 2015.</p> <p>Given the cut in funding, and the uncertainty over the new system, it is likely that, if any significant amount of affordable housing is to be built in the next four years, and beyond, a significant financial contribution will still be required from market housing developments. Market housing can help to deliver affordable housing both through on-site provision in new developments, and through financial contributions to off-site developments.</p> <p>We believe it is important for Policy CS6 to have sufficiently flexible to allow infill development that will</p>			

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													<p>meet local needs. Where this will mean market housing which can help to fund affordable housing, the Policy must allow for this. As we have noted, the existing Local Plan policy was amended by the Inspector to allow for market housing to be provided, where this would help to meet a local need, which includes the provision of affordable housing. Given the recent difficulties experienced in delivering affordable housing nationally, and the unproven nature of the Government's new system, it is only sensible to allow flexibility within the replacement policy, to allow it to be effective, and to deliver the housing which local people need.</p> <p><b>Delivering Local Facilities</b></p> <p>We note that Policy CS6 has been drafted to allow for the delivery of 'local facilities to meet the needs of the village'. We would speculate that the need for such facilities may be identified through a neighbourhood plan, or through the village appraisals referred to in paragraph 8.33 of the draft Core Strategy. They might include, for instance, a new church hall or new sports facilities. However, the funding mechanisms for these facilities is unclear, and it is our experience that market housing is often required to deliver expensive new facilities of this nature.</p> <p>If a neighbourhood plan, which the recent Localism Bill has clarified would now be part of the development plan, were to specify the need for an expensive new facility, there is no indication in the draft policy or its supporting text of</p>			

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													<p>how this would be delivered.</p> <p><b>The Form and Location of Mill Development</b></p> <p>The supporting text for Policy CS6, at paragraph 8.34, also outlines a particularly restrictive approach to the definition on 'infill development'. We believe this definition is too restrictive and insufficiently flexible to meet the local needs of these villages in all cases, and this is an issue better left to the determination of individual planning applications.</p> <p>The Local Plan Inspector also considered this issue, and concluded that:</p> <p><b>'Turning to the location of the infill, while I appreciate the Council's desire to restrict insensitive "backland" developments, I consider limiting development to gaps in an otherwise built-up frontage is unduly restrictive. Many of the villages are characterised by a much more complex pattern of development, especially close to their core. Within this context new infill development could in some cases be accommodated on "backland" sites without detriment to the character of the village or to the openness of the Green Belt. In my opinion, clause (i), which requires development to be sympathetic to its surroundings, is a sufficient safeguard against poorly designed or visually damaging schemes. Consequently, I see no need for the additional limitation set out in clause (iii), which in my view imposes a potentially harmful rigidity on future infill schemes. I therefore recommend</b></p>			

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													<p><b>that the Plan be modified by the deletion of clause (iii).'</b> (IR, 4.42.24)</p> <p>We agree with the Inspector's comments, and have seen no evidence to justify the revised approach taken in the draft Core Strategy. We suggest that the references to infill development should be removed from paragraph 8.34.</p> <p><b>Soundness</b></p> <p>As drafted, Policy CS6 and its supporting text is unsound because it is not justified. No evidence has been presented to explain the changes from Policy 6 of the Local Plan in relation to prohibiting market housing in infill developments, and the altered definition of infill development. The Inspector considering the Local Plan considered similar proposed changes to be overly restrictive, and contrary to the overall aims of the current Policy 6, as they would fail to meet local needs, and no evidence has been provided to show this is not still the case.</p> <p>The changes will also render Policy CS6 ineffective, as it will not generally be possible to deliver new development to meet local needs, whether this is affordable housing, pr other community facilities. The performance of Policy 6 of the Local Plan shows that it is already failing to provide affordable housing in these villages, and Policy CS6 will</p> <p>need to take a less restrictive approach to development if it is not to continue to fail to meet local</p>			

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													needs. It should therefore permit limited market housing, where this will help to fulfil the aims of the policy by delivering development that will meet proven local needs.			
211055	Mr Matthew Wood	Hertfordshire County Council				Selected Small Villages in the Green Belt	CS6	Policy CS 6	Supporting	Yes	Yes		The acknowledgment of the potential requirement for 'local facilities to meet the needs of the village' /'community facilities' set out in each policy, provides the flexibility that would be needed in the event that any school related development proves to be required over the plan period to 2031.		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
211503	Mr	Chilterns Conservatio				Selected Small Villages in the	CS6	Policy CS 6	Supporting	Yes	Yes		A Conservation Board is a statutory independent corporate body set up		No, I do not wish to	

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	Colin White	n Board				Green Belt							<p>by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a</p>		participate at the oral examination	



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												<p>relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The Policy is supported as drafted.</p>				
211434	Ms Joanne Deacon	Chipperfield Parish Council				Selected Small Villages in the Green Belt	CS 6	Policy CS 6	Objecting	Yes	No	b) Effective	Point (c) in policy CS6 permits the conversion of houses into flats. There are a number of large properties in Chipperfield. If they were converted into flats the increase in the number of residents and would put undue pressure on infrastructure and services. This would be counter to the main aim of the policy.		No, I do not wish to participate at the oral examination	
217807	Mrs Claire Crouchley	Wigginton Parish Council				Selected Small Villages in the Green Belt	CS6	Policy CS 6	Objecting	Yes	No	b) Effective	Wigginton Parish Council believes that the soundness and effectiveness would be strengthened by the addition at the end of condition ii) of policy CS6 "especially within areas defined as			

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													being AONB."			
625412		Ivan Carter	619659	Mr David Lane	DLA Town Planning Ltd	Selected Small Villages in the Green Belt	CS6	Policy CS 6	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified and is not consistent with national policy.</p> <p>The objection (CS6) is to item (b) "limited infilling with affordable housing for local people."</p> <p>The policy is supported in so far that the reference to "limited infilling" is not defined numerically, However the requirement for housing solely for local needs is not reasonable, will not result in mixed communities and will not enable development to take place. An element of market housing should be allowed to enable affordable housing to be provided.</p>		Yes, I wish to participate at the oral examination	To fully explore the issues raised in my report.
627695	Mr W Cleeve	Hogarth Properties	627696	Mr Tim Waller	JB Planning Associates	Selected Small Villages in the Green Belt	CS 6	Policy CS 6	Objecting	Yes	No	a) Justified	<p>It is unsound because it is not Justified or Effective, with national policy.</p> <p>As drafted, Policy CS6 represents a more restrictive version of Policy 6 of the current Local Plan, precluding the possibility of infill market housing being built in the selected small villages in the Green Belt, and its supporting text gives a more restrictive definition of where infill development may be located. The Inspector's report into the current Local Plan considered these issues in detail, and the Inspector's conclusions contradict the approach taken in the draft Policy CS6. The Council's evidence base does not set out the reasons as to why they have chosen to make this policy more restrictive, or their justification for doing so. Policy CS6 is currently</p>	<p><b>Proposed Amendments</b></p> <p>As Policy 6 of the Local Plan can be seen to have been failing to provide new affordable housing in these villages, Policy CS6 must take a more flexible approach if it is truly to be able to deliver affordable housing, and other development, which will meet 'local needs'. We suggest the inclusion of the following clause into the policy:</p> <p><b>(g) residential development for sale on the open market, where this will help to deliver affordable housing or other facilities for which there is a proven local need.</b></p> <p>We also suggest that Policy CS6 should encourage the use of</p>	Yes, I wish to participate at the oral examination	Policy CS6 is the key policy relating to development in the villages it names, and we are keen to ensure that the mistakes of the previous Policy 6 are not repeated, and that local needs can be met through the provisions of this policy. We therefore wish to have the opportunity to take part in the discussion at the Examination over the document's soundness as drafted, and how

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													<p>too restrictive and inflexible, and is not sound because it will fail to meet 'local needs'.</p> <p>Policy CS6 has been drafted so as to preclude market housing from coming forward in the small villages within the Green Belt, where infill opportunities exist within these villages. The Policy specifies that infill housing should be 'affordable' and 'for local people', and this is echoed in paragraph 8.34. This issue was previously considered in relation to Policy 6 of the Local Plan (referred to as Policy 4 in the Local Plan Inspector's Report). The Inspector considered that representations suggesting only affordable housing should be permitted in these villages were not justified or reasonable. He concluded that the requirement for new housing to meet a 'local need' provided sufficient restriction to prevent normal market housing development from coming forwards in most circumstances, but did not preclude such development, where it might satisfy the 'local need' test.</p> <p>In terms of market housing which would be consistent with the 'local needs' test, the Inspector noted that, in addition to housing for agricultural workers or 'to provide affordable housing', market housing may for instance be required for people employed by a local business (IR, para 4.42.11). He noted that the appropriateness of market housing is 'best assessed at the time, rather than being ruled out at this stage', and it was neither necessary nor appropriate to preclude the</p>	<p>Council land and facilities to help deliver new development which will meet proven local needs, such as by providing a site for affordable housing which is to be funded by financial contributions from other development sites. We believe it would be appropriate to include a statement to this effect within the policy.</p>		<p>it might be amended.</p>

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													<p>provision of affordable housing. He noted:</p> <p><b>'I consider it is appropriate for Policy 4 to maintain a degree of flexibility at the local level. Although it may be difficult to establish that open market housing will meet a genuine local need, I do not believe this should be ruled out in principle.'</b> (IR 4.42.11)</p> <p>The same reasoning is relevant with regard to the current draft policy. The Inspector's conclusions were drawn in relation to the advice in PPG2, which is the national planning policy document against which the current draft policy must be considered. PPG2 does not require all infill development to be for affordable housing, but by inference allows for market housing. PPG2 also says that policies should ensure that any infilling should not have any adverse effect on the character of the village concerned, and this point is covered by point (i) of the draft Policy.</p> <p>We have experience of the way in which the council have interpreted the policy in the determination of planning applications, and they have been clear that the 'local need' clause prohibits most market housing, while accepting that it may be permitted in exceptional circumstances which help to serve a local need, such as through helping to provide affordable housing. In fact, our experience of the interpretation of Policy 6 of the Local Plan, is that it has caused confusion and inconsistent decision making. This is principally related to the Council's interpretation of 'local need'. While this may have been</p>			

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													<p>intended to relate to a number of different issues at the time of the adoption of the Local Plan, it has increasingly been considered to relate only to the provision of affordable housing. This change in thinking is evident through the Council's proposed changes to the revised Policy CS6, which changes the previous clause concerning residential infilling to meet a proven local need to a simplified clause relating to 'affordable housing for local people.'</p> <p>However, despite this change in emphasis, the Local Plan policy has failed to deliver any significant amount of affordable housing, and therefore generally failed to meet local needs due to its inflexible interpretation. The Council's Annual Monitoring Report (AMR) for 2009/10 shows that the provision of affordable housing within the District has consistently been below the Council's target, set in the East of England Plan. The AMR 2009/10 records that 685 affordable dwellings have been completed since 2001, against a requirement for 1,125, leaving a cumulative shortfall of 440 dwellings to date. Appendix 3 of this AMR lists the affordable housing developments which have recently been completed (96 dwellings), those which are currently under construction (80 dwellings), and those which either have planning permission (278 dwellings), or which it is speculated may come forward for development (369 dwellings). Out of all of these figures, only 6 dwellings, on a small site in Chipperfield, are to come forward in one of the selected small villages in the Green Belt. This site is being brought forward by a Housing Association, as a rural exception</p>			

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													<p>site. It is therefore clear that the current Policy 6 does not promote affordable housing to meet local needs, as none of the houses listed in the AMR are coming forward under its provisions. However, despite this, the draft policy is even more restrictive with regard to market housing, which is one of the few means by which affordable housing could be delivered in these villages.</p> <p>A new policy must therefore be designed to overcome the failure of the previous policy to meet local needs, and to provide affordable housing. When looking to design a new policy, which can deliver affordable housing to meet the local needs of these villages, it is important to consider the mechanisms by which affordable housing will be delivered in the future. The Government have recently cut funding for affordable housing so dramatically that the number of new starts on affordable housing developments at a national level dropped from 35,735 between October 2010 and March 2011, down to 454 between April and September 2011<sup>1</sup>, a 99%/0 fall. The Government's intention is for affordable housing to be delivered through their new affordable rent scheme, with housing associations funding and building housing on the basis of rents paid through the benefits system of up to 80% of the normal market rent. This system is still unproven, and its implementation is the reason for the recent hiatus in affordable house building. Housing associations are understandably concerned about the increased financial risks they will be expected to bear under the new system, and there is uncertainty over the number of houses which</p>			

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													<p>may be delivered by the new system. At the same time, the Government has cut its grant funding, the means by which the majority of affordable housing was delivered until recently, by around 65% /0, and we understand that little or no grant funding remains nationally for the period up to 2015.</p> <p>Given the cut in funding, and the uncertainty over the new system, it is likely that, if any significant amount of affordable housing is to be built in the next four years, and beyond, a significant financial contribution will still be required from market housing developments. Market housing can help to deliver affordable housing both through on-site provision in new developments, and through financial contributions to off-site developments.</p> <p>We believe it is important for Policy CS6 to have sufficiently flexible to allow infill development that will meet local needs. Where this will mean market housing which can help to fund affordable housing, the Policy must allow for this. As we have noted, the existing Local Plan policy was amended by the Inspector to allow for market housing to be provided, where this would help to meet a local need, which includes the provision of affordable housing. Given the recent difficulties experienced in delivering affordable housing nationally, and the unproven nature of the Government's new system, it is only sensible to allow flexibility within the replacement policy, to allow it to be effective, and to deliver the housing which local people need.</p> <p><b>Delivering Local Facilities</b></p>			

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													<p>We note that Policy CS6 has been drafted to allow for the delivery of 'local facilities to meet the needs of the village'. We would speculate that the need for such facilities may be identified through a neighbourhood plan, or through the village appraisals referred to in paragraph 8.33 of the draft Core Strategy. They might include, for instance, a new church hall or new sports facilities. However, the funding mechanisms for these facilities is unclear, and it is our experience that market housing is often required to deliver expensive new facilities of this nature.</p> <p>If a neighbourhood plan, which the recent Localism Bill has clarified would now be part of the development plan, were to specify the need for an expensive new facility, there is no indication in the draft policy or its supporting text of how this would be delivered.</p> <p><b>The Form and Location of Mill Development</b></p> <p>The supporting text for Policy CS6, at paragraph 8.34, also outlines a particularly restrictive approach to the definition on 'infill development'. We believe this definition is too restrictive and insufficiently flexible to meet the local needs of these villages in all cases, and this is an issue better left to the determination of individual planning applications.</p> <p>The Local Plan Inspector also considered this issue, and concluded that:</p> <p><b>'Turning to the location of the infill, while I appreciate the</b></p>			



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													<p>Council's desire to restrict insensitive "backland" developments, I consider limiting development to gaps in an otherwise built-up frontage is unduly restrictive. Many of the villages are characterised by a much more complex pattern of development, especially close to their core. Within this context new infill development could in some cases be accommodated on "backland" sites without detriment to the character of the village or to the openness of the Green Belt. In my opinion, clause (i), which requires development to be sympathetic to its surroundings, is a sufficient safeguard against poorly designed or visually damaging schemes. Consequently, I see no need for the additional limitation set out in clause (iii), which in my view imposes a potentially harmful rigidity on future infill schemes. I therefore recommend that the Plan be modified by the deletion of clause (iii).' (IR, 4.42.24)</p> <p>We agree with the Inspector's comments, and have seen no evidence to justify the revised approach taken in the draft Core Strategy. We suggest that the references to infill development should be removed from paragraph 8.34.</p> <p><b>Soundness</b></p> <p>As drafted, Policy CS6 and its supporting text is unsound because it is not justified. No evidence has been presented to explain the changes from Policy 6 of the Local Plan in relation to prohibiting market housing in infill developments, and the altered definition of infill</p>			

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													<p>development. The Inspector considering the Local Plan considered similar proposed changes to be overly restrictive, and contrary to the overall aims of the current Policy 6, as they would fail to meet local needs, and no evidence has been provided to show this is not still the case.</p> <p>The changes will also render Policy CS6 ineffective, as it will not generally be possible to deliver new development to meet local needs, whether this is affordable housing, or other community facilities. The performance of Policy 6 of the Local Plan shows that it is already failing to provide affordable housing in these villages, and Policy CS6 will</p> <p>need to take a less restrictive approach to development if it is not to continue to fail to meet local needs. It should therefore permit limited market housing, where this will help to fulfil the aims of the policy by delivering development that will meet proven local needs.</p>			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Rural Area	Policy CS7: Rural Areas	Policy CS 7	Supporting	Yes	Yes		The Trust welcome the policy provision for social, community and leisure uses, in areas outside the Metropolitan Green Belt.			
211055	Mr Matthew Wood	Hertfordshire County Council				Rural Area	CS7	Policy CS 7	Supporting	Yes	Yes		The acknowledgment of the potential requirement for 'local facilities to meet the needs of the village' /'community facilities' set out in each policy, provides the flexibility that would be needed in the event that any school related development proves to be required over the plan period to 2031.	Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the	

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																Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
498429	Steve Baker	CPRE - The Hertfordshire Society				Rural Area	CS7	Policy CS 7	Objecting	Yes	No	b) Effective	The caveats set out at the end of Policy CS6 are equally applicable to development in the Rural Area and should be included at the end of Policy CS7, with the final word 'village' replaced by 'countryside'.	As set out above.	No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Rural Area	CS7	Policy CS 7	Objecting	Yes	No	c) Consistent with national policy	A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.  Section 87 of the CRoW Act sets out the purposes of a conservation board as:  a) the purpose of conserving and	Add a cross reference to Policy CS24 (the Chilterns AONB).	No, I do not wish to participate at the oral examination	

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													<p>enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on</p>			

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													<p>board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>This policy is concerned with the rural area (which includes Aldbury as part of the AONB). Though the policy is generally supported the Board considers that it would be useful to also cross refer to Policy CS24 (the Chilterns AONB).</p>			
498388	Bill Ashburner		398601	Mr Laurence Quail	JB Planning Associates	Rural Area	CS7	Policy CS 7	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>There is sometimes a need for new housing in the rural area, where this can help to meet the needs of local communities or when existing sites cease to be viable and then become vacant.</p> <p>Similarly, market housing may be the only available means by which a vacant site can be redeveloped. Redeveloping previously developed sites in the rural areas often enhances the local landscape and rural area.</p> <p>Policy CS7 should therefore be amended to allow for appropriate</p>	<p><b>Proposed Amendments</b></p> <p>Part (g) of Policy CS7 should be amended to relate to all rural businesses.</p> <p>An additional clause should be included in the policy to allow for limited market housing which will help to meet proven local needs, for instance through funding affordable housing or new community facilities. Furthermore in certain circumstance, particularly when redeveloping Previously Developed Land it may be necessary for new residential development to come forward. We note that the scale and form of any such development would be controlled by the Core Strategy's</p>	Yes, I wish to participate at the oral examination	The vitality of rural areas is an important aspect of the Core Strategy's policies, and we are concerned that the proposed policies will not provide the type of development which these areas require to ensure their future vitality. We therefore wish to have the opportunity to take part in the discussion at the Examination over the document's soundness as

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													flexibility when vacant sites cannot be developed for an alternative uses.  <b>Soundness</b>  As drafted, Policy CS7 is insufficiently flexible, as it fails to allow for new residential uses on sites which need redeveloping in rural areas and the Green Belt. Viability is an essential part of the development process and often redeveloping costly brownfield sites requires some form of housing to pay for the necessary works. It will therefore be effective to re- word the policy so it will help to support failing businesses to support the 'healthy local economy' and 'employment opportunities' in all parts of the Borough, which are mentioned in the Core Strategy's Vision, as it relates to rural areas.  The preclusion of housing is also contrary to national planning policy in PPS7.	other policies.		drafted, and how it might be amended.
6276 95	Mr W Cleeve	Hogarth Properties	6276 96	Mr Tim Waller	JB Planning Associates	Rural Area	CS 7	Policy CS 7	Objecting	Yes	No	b) Effective	It is unsound because it is not, Effective and Consistent with national policy.  For the reasons set out in our accompanying representation on Policy CS6, there is sometimes a need for new market housing in the rural area, where this can help to meet the needs of local communities. For instance, paragraph 10 of PPS7 allows for new dwellings in rural areas, where they will help to meet the needs of local businesses. Similarly, market housing may be the only available means by which essential development which is required to meet local needs, such as affordable housing or new	Part (g) of Policy CS7 should be amended to relate to all rural businesses.  An additional clause should be included in the policy to allow for limited market housing which will help to meet proven local needs, for instance through funding affordable housing or new community facilities. We note that the scale and form of any such development would be controlled by the Core Strategy's other policies.	Yes, I wish to participate at the oral examination	The vitality of rural areas is an important aspect of the Core Strategy's policies, and we are concerned that the proposed policies will not provide the type of development which these areas require to ensure their future vitality. We therefore wish to have the opportunity to take part in the discussion at the Examination over the document's

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													<p>community facilities, might be delivered.</p> <p>Policy CS7 should therefore be amended to allow new market housing, where these or other circumstances exist to justify that development in relation to proven local needs. Point (g) of the policy hints as this type of approach, but it is insufficiently flexible, being related only to farm diversification, and not other rural businesses, or community needs.</p> <p><b>Soundness</b></p> <p>As drafted, Policy CS7 is insufficiently flexible, as it fails to allow for new residential development which may help to meet a proven local need, either by providing housing for rural workers, or b providing funding for affordable housing or other community projects. It will therefore not be effective in meeting local needs, and will fail to support the 'healthy local economy' and 'employment opportunities' in all parts of the Borough, which are mentioned in the Core Strategy's Vision, as it relates to rural areas.</p> <p>The preclusion of housing to meet rural needs is also contrary to national planning policy in PPS7.</p>			soundness as drafted, and how it might be amended.
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	9.1	9.1	Supporting	Yes	Yes		<p>P67 Para 9.1 &amp; 9.2 Support</p> <p>Measures to reduce the need to own one's car are to be encouraged. This could include fostering 'car clubs' and allocating specific locations where such vehicles can be accessed and returned.</p>		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.

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211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	9.2	9.2	Supporting	Yes	Yes		P67 Para 9.1 & 9.2 Support  Measures to reduce the need to own one's car are to be encouraged. This could include fostering 'car clubs' and allocating specific locations where such vehicles can be accessed and returned.		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Paragraph	9.3	9.3	Objecting	No	b) Effective		We support these objectives, but this is not sufficiently <b>effective</b> , since it omits policies on commonly occurring problems.  The principle of giving preference to pedestrians is welcome. However the above headings should be supplemented by further bullet points relating to combatting the following problems:  Widespread pavement abuse through parking and protracted building maintenance.  Working vehicles used for journey-to-work.  Multiple household car ownership reliant on unregulated free-for-all on-street parking.  Control of new car parking spaces should phased in around the other measures, in order to minimise the consequence of increasing roadway, verge and pavement	The "approach" should be supplemented by further bullet points relating to combatting the following problems:  Widespread pavement abuse through parking and protracted building maintenance.  Working vehicles used for journey-to-work.  Multiple household car ownership reliant on unregulated free-for-all on-street parking.  It should be stated that control of new car parking spaces will be phased in around the other measures, in order to minimise the consequence of increasing roadway, verge and pavement parking.	No, I do not wish to participate at the oral examination	



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													parking.			
619677		Blackjack Investments Ltd	398614	Mr Mark Flood	Insight Town Planning	Paragraph	9.6	9.6	Supporting	Yes	Yes		<p>This paragraph emphasises that the Council will promote realistic opportunity for sustainable transport choices. Our client supports this statement, not least because the land east of Tring offers an unparalleled opportunity for sustainable transport choice for new residents at Tring. It lies immediately adjacent to a dedicated footpath and cycleway and is so close to the railway station that it offers the very real opportunity to access passenger transport without use of the private car. At the same time it is in recognised walking and cycling distances of services and facilities.</p> <p>Given the clear statement by the Council within paragraph 9.6, it is not clear to our client why land east of Tring has been set aside as a sound option for urban extension.</p>		Yes, I wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	9.11	9.11	Objecting	Yes	No	b) Effective	<p>There is insufficient detail and BRAG would point out that traffic and parking is a major problem for existing residents and businesses in Berkhamsted without any further development. What is needed is a comprehensive transportation plan, catering for all sectors of the community and all modes of transport. It is unclear whether the Berkhamsted Urban Transport Plan would fill the bill but in any case, it is not scheduled to start until 2012 which does not synchronise with the development of the Strategic Housing Site.</p>		Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Sustainable Transport	CS 8	Policy CS 8	Objecting		No	b) Effective	<p>This is not sufficiently explicit to be <b>effective</b>. We welcome this prioritisation of transport modes. However the plan must contain a pledge not to cut existing bus services. There is also a strong case for a large increase in</p>	The plan must contain a pledge not to cut existing bus services, and take into account that there is also a strong case for a large increase in services, especially in villages, that bus services need to operate late in the evening over all	No, I do not wish to participate at the oral examination	

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													services, especially in villages. Bus services need to operate late in the evening over all parts of Dacorum, and there must be good bus services on Sundays. Bus services need to be cheap, frequent and safe. There should also be a rapid transition to cleaner fuels to be used in the operation of the buses eg Electric , Hybrid and L.P.G. See also our response to 9.3.	parts of Dacorum , that there must be good bus services on Sundays and that Bus services need to be cheap, frequent and safe.  There should also be a commitment to a rapid transition to cleaner fuels to be used in the operation of the buses eg Electric , Hybrid and L.P.G.		
491185	Sheila Doyle	Friends of the Earth				Sustainable Transport	CS8	Policy CS 8	Objecting	Yes	Yes		There must be no cuts to local bus services including village route. The route/service should be safe and secure . There should be rapid transition to cleaner fuels eg electric, hybrid and L.P.G		Yes, I wish to participate at the oral examination	personal representation
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Sustainable Transport	CS8	Policy CS 8	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Effective.  Draft Policy CS8 is not considered to be effective as it is not sufficiently flexible. The policy states that development proposals will contribute to the implementation of the strategies and priorities set out in the Local Transport Plan and local Urban Transport Plans. However, settlement-specific local Urban Transport Plans have not yet been published.	For the reasons set out above, the following changes (indicated in bold and italics) are considered necessary in order to make the Core Strategy Sound:  <u>Policy CS8: Sustainable Transport</u>  All new development will contribute to a well connected and accessible transport system whose principles are to:  (a) give priority to the needs of other road and passenger transport users over the private car in the following order:  pedestrians cyclists passenger transport (buses, trains and taxis)  powered two wheeled vehicles other motor vehicles;  (b) ensure good access for people with disabilities;  (c) ensure passenger transport is integrated with movement on roads, footways and cycleways;	Yes, I wish to participate at the oral examination	It is necessary as the above relates to important changes to the Core Strategy Plan in relation to future development growth across the borough and at Berkhamsted.

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														(d) create safer and continuous footpath and cycle networks, particularly in the towns;  (e) maintain and extend the rural rights of way network;  (f) improve road safety and air quality;  (g) strengthen links to and between key facilities (bus and railway stations, hospitals, main employers and town centres); and  (h) provide sufficient, safe and convenient parking based on car parking standards: the application of those standards will take account of the accessibility of the location, promoting economic development and regeneration, supporting shopping areas, safeguarding residential amenity and ensuring highway safety.  Development proposals <b>should</b> also contribute to the implementation of the strategies and priorities set out in the Local Transport Plan and local Urban Transport Plans <b>where possible or otherwise demonstrate on their own merits improvements and enhancement to the local and wider transport network through increased public transport usage</b> .		
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd	Sustainable Transport	CS8	Policy CS 8	Objecting	Yes	No	b) Effective	Whilst we support the broad approach towards promoting sustainable transport choices/modes (as set out in Policy CS8), in our view, greater emphasis should also be placed upon reducing car parking levels within new development to discourage car use/ownership. At present, the Council's maximum car parking standards require a greater	Policy CS8 should also seek to reduce car parking levels within new development (alongside the promotion of non-car transport modes), to reduce car ownership/useage.	Yes, I wish to participate at the oral examination	Our client (Zog Brownfield Ventures Ltd) is a significant land holder within the Borough and is currently pursuing the redevelopment of the Hicks Road Industrial Estate

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													<p>level of car parking within new development when compared to current car/vehicle ownership levels within the Borough - thus, meaning that new development will often be overproviding car parking spaces (which does little to discourage car ownership/useage).</p> <p>We urge the Council to adopt a comprehensive strategy towards promoting sustainable transport - and consider options for reducing car parking availability (within new development) alongside the promotion of non-car modes of transport.</p>			(identified as Strategic Site SS2 in the Pre-Submission Core Strategy).
619677		Blackjack Investments Ltd	398614	Mr Mark Flood	Insight Town Planning	Sustainable Transport	CS8	Policy CS 8	Supporting	Yes	Yes		<p>Following on from paragraph 9.6, our client supports Policy CS8 and its statement that all new development will contribute to a well connected and accessible transport system. Whilst the policy is principally directed at achieving the aims of the Local Transport Plan, presumably via s106 obligations, our client's land is so well placed that it inherently contributes to the aims and objectives of the policy.</p>		Yes, I wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Sustainable Transport	CS 8	Policy CS 8	Supporting	Yes	Yes		<p>A suitable addition to the policy is needed. Policy CS8 [Sustainable Transport] Support</p> <p>Include new items:</p> <p>Recharging points for electric vehicles.</p> <p>Allocate spaces for 'car club' vehicles.</p>		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Sustainable Transport	CS 8	Policy CS 8	Supporting	Yes	Yes		<p>This comment relates to Policy CS8: Sustainable Transport.</p> <p>Our client supports the principles of the policy and agrees that all development should deliver a transport contribution of a suitable</p>		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing

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													scale and/or provide for the development of required transport infrastructure, as necessary, to offset the impact of the development.			delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
633333	Mr Paul Harris	Dacorum Green Party				Sustainable Transport	CS8	Policy CS 8	Supporting	Yes	Yes			There must be no cuts in existing bus services and there is a strong case for a large increase in services, especially in villages. Bus services need to operate late in the evening over all parts of Dacorum and there must be good bus services on Sundays. Bus services need to be frequent and safe. There should also be a rigid transition to cleaner fuels to be used in the operation of buses e.g. electric, hybrid, LPG.	Yes, I wish to participate at the oral examination	I like to make a personal appearance.
211503	Mr Colin White	Chilterns Conservation Board				Management of Roads	CS9	Policy CS 9	Supporting	Yes	Yes		A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.  Section 87 of the CRoW Act sets out the purposes of a conservation board as:  a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty,	No, I do not wish to participate at the oral examination		

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												<p>and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White,</p>				

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													<p>Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>This policy deals with the management of roads and is supported as drafted. The reference that is made to supporting the Environmental Guidelines for the Management of Highways in the Chilterns' is welcomed.</p>			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Management of Roads	CS9	Policy CS 9	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>Draft Policy CS9 is not considered justified or effective because it identifies that only "small-scale" improvement will be undertaken to tackle "local" problems. "Small-scale" is not defined and the reasoning for this limitation is not clear. Local new road improvements could be required to address strategic, settlement-specific issues which might not necessarily be considered "small-scale." The policy also fails to recognise the role new development can have to facilitate new transportation (road related and otherwise) improvements.</p> <p>The north eastern relief road around Hemel Hempstead is also</p>	<p><b><u>Policy CS9: Management of Roads</u></b></p> <p>All new development will be directed to the appropriate category of road in the road hierarchy based on its scale, traffic generation, safety impact, and environmental effect.</p> <p>The traffic generated from new development must be compatible with the location, design and capacity of the current and future operation of the road hierarchy, taking into account any planned improvements and cumulative effects of incremental developments.</p> <p>Improvements to the network and all traffic management measures will be designed to channel long</p>		

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													<p>recommended for deletion from draft Policy on the basis that there is no credible evidence put forward by DBC which explains its delivery through stakeholder commitment and funding. This might affect the delivery of West Hemel as a Local Allocation which must be considered and explored further by DBC.</p>	<p>distance through traffic onto the motorway and primary roads (i.e. M1, M25, A5 and A41).</p> <p>In Hemel Hempstead road improvements will focus on relieving congestion in and around the Maylands Business Park, and improving the capacity and safety of the Plough Roundabout. Elsewhere, <b>new and improved transportation infrastructure</b> will be undertaken to tackle local environmental and safety problems.</p> <p><b>The role new development has in facilitating the delivery of new road infrastructure and/ or improvements to the existing local and wider network should be favoured in support of those development proposals.</b></p> <p>Other new road capacity will only be justified for local environmental, air quality (including any declared Air Quality Management Areas), safety reasons, or for accommodating local access requirements.</p> <p>Local road space will be shared and designed to allow the safe movement of all users.</p> <p>In villages and the countryside, special regard will be paid to the effect of new development and traffic on the safety and environmental character of country lanes.</p>		
502874	Mr Chris Bearton	Hertfordshire County Council				Management of Roads	CS9	Policy CS 9	Objecting	No	No		In particular, clarification is sought on the definition of small scale improvements (Policy CS9) in relation to primary road corridors serving the Town Centre, Maylands Business Park in Hemel			



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													Hempstead, A4251 London Road corridor in Apsley and the A4251 corridor in Berkhamsted.			
623313	Mr John Clark	CBRE Global Investors	623314	Mr Jon Stoddart	CBRE Ltd	Management of Roads	CS9	Policy CS 9	Supporting	Yes	Yes		CBRE supports the need for flexibility within the affordable housing policy.			
223914	Mrs Nichola Mills					Paragraph	10.3	10.3	Supporting	Yes	Yes		Yes - it is important that any development must be of high quality to improve the current quality of living within in Hemel Hempstead. We need to learn from the mistakes of past building and create a much nicer area to live, whilst maintaining historic character of the borough, and by improving any areas marred by neglect or insensitive development in the past.		No, I do not wish to participate at the oral examination	
610088	Mr Martin Hicks	HBRC				Paragraph	10.4	10.4	Objecting		No	b) Effective	This should also reflect the impact of artificial lighting on local environments and include:  impacts of artificial lighting on natural environments and the reduction of light pollution where appropriate.  This is also a key energy issue as well.	Add:  impacts of artificial lighting on natural environments and the reduction of light pollution where appropriate.	No, I do not wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 10.5	10.5	Supporting	Yes	Yes		P 73 Para 10.5 Support  Residential Character Appraisals over Hemel Hempstead, Berkhamsted and Tring were adopted in 2004.  These have served to preserve the character of their settlements: any update of the Urban Design Assessments and RCA Appraisals should continue to respect the existing character and densities. Any attempt to impose higher		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.

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													densities that undermine local character should be avoided.			
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	10.9	10.9	Supporting	Yes	Yes		<p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p>		No, I do not wish to participate at the oral examination	

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													<p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The Board supports and welcomes the prominence given to the Chilterns Buildings Design Guide and supplementary building materials technical notes.</p>			
211072	Ms Katherine Fletcher	English Heritage				Quality of Settlement Design	CS10	Policy CS 10	Objecting	Yes	No		Add '(h) protect the historic street pattern and legibility of the settlement'.			
211503	Mr Colin	Chilterns Conservation Board				Quality of Settlement Design	CS10	Policy CS 10	Supporting	Yes	Yes		A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the		No, I do not wish to participate	

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	White												<p>provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard</p>		at the oral examination	

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													<p>to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The policy is supported as drafted.</p>			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Quality of Settlement Design	CS10	Policy CS 10	Objecting	Yes	No	b) Effective	<p>We welcome the acknowledgment that GI resources should be "protected, enhanced and extended" (paragraph 16.13) and the expectation in Policy CS10 g) that development should "protect and enhance wildlife corridors". However, we suggest that it would be more effective and practical in terms of positive outcomes for wildlife and ecological connectivity in the Borough to state "protect and enhance wildlife corridors, stepping stones and other ecological linkages".</p>	No, I do not wish to participate at the oral examination		

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494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Quality of Settlement Design	Cs 10	Policy CS 10	Supporting	Yes	Yes		<p>This comment relates to Policy CS10: Quality of Settlement Design.</p> <p>The principles of the policy are generally supported. However, it is noted that criterion (a) states that development should <i>'respect defined countryside borders and the landscape character surrounding the town or village'</i>.</p> <p>Whilst our client would agree with this as a general principle, in certain locations (that is, Local Allocations), the existing countryside borders will need to be altered to accommodate development. This point should be clarified within the policy text.</p>	Having regard to this, it is suggested that the wording of the policy is amended to include a caveat which states that where identified (such as the Local Allocations) defined countryside borders will be sensitively amended, and that this will be defined in the Site Allocation DPD.	Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
515465	Mr Alan Kemp	Berkhamsted Town Council				Quality of Settlement Design	CS10	Policy CS 10	Supporting	Yes	Yes		<p>BTC regards these policies as a helpful consolidation and elaboration of many current policies relating to design and character.</p> <p>Spaces between buildings are as important as density in the context of the character of an area.</p> <p>Berkhamsted Town Council strongly believes that the Character Area Assessments should remain as a source of planning guidance as they have served the development management decisions of the town well. If an Urban Design Assessment is used alone or in priority to the Character Area Assessments this would lead to significantly higher densities in the suburban areas of the town than has been allowed under current</p>	<p>Replace "Respect the typical density intended" with "Conform to the typical density and graining".</p> <p>In the final sentence include, after Urban Design, "and Character Area Assessments".</p>	Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.

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													<p>policies and Supplementary Planning Guidance. The Character Area Assessments should be retained as a source of planning policy in the new LDF and their efficacy should not be diluted in the context of the new Urban Design Assessments.</p> <p><b>Representation:</b></p> <p><b>1. Pages 77-78, Policies CS10, CS11 except bullet point (a), and CS12, Support</b></p> <p>4. BTC regards these policies as a helpful consolidation and elaboration of many current policies relating to design and character.</p>			
211072	Ms Katherine Fletcher	English Heritage				Quality of Neighbourhood Design	CS11	Policy CS 11	Objecting	Yes	No		Add: '(g) make a positive contribution to the character and local distinctiveness of the historic environment. The consideration of design should include scale, height, massing, alignment, materials and use'. (PPS5, policy HE7.5).			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Quality of Neighbourhood Design	CS11	Policy CS 11	Supporting	Yes	Yes					
211503	Mr Colin White	Chilterns Conservation Board				Quality of Neighbourhood Design	CS11	Policy CS 11	Supporting	Yes	Yes		<p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p>		No, I do not wish to participate at the oral examination	

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												<p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for</p>				



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													<p>approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The policy is supported as drafted.</p>			
515465	Mr Alan Kemp	Berkhamsted Town Council				Quality of Neighbourhood Design	CS11	Policy CS 11	Objecting	Yes	No	b) Effective	<p>Spaces between buildings are as important as density in the context of the character of an area.</p> <p>Berkhamsted Town Council strongly believes that the Character Area Assessments should remain as a source of planning guidance as they have served the development management decisions of the town well. If an Urban Design Assessment is used alone or in priority to the Character Area Assessments this would lead to significantly higher densities in the suburban areas of the town than has been allowed under current policies and Supplementary Planning Guidance. The Character Area Assessments should be retained as a source of planning policy in the new LDF and their efficacy should not be diluted in the context of the new Urban Design Assessments.</p> <p><b>Representation:</b></p> <p><b>1. Pages 77-78, Policies CS10, CS11 except bullet point (a), and</b></p>	<p>Replace "Respect the typical density intended" with "Conform to the typical density and graining".</p> <p>In the final sentence include, after Urban Design, "and Character Area Assessments".</p>	Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.

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													<p><b>CS12, Support</b></p> <p>4. BTC regards these policies as a helpful consolidation and elaboration of many current policies relating to design and character.</p> <p><b>Representation:</b></p> <p><b>2. Page 77, Policy CS11, bullet point (a), Object</b></p> <p>3. Sound No</p> <p>4. Effective No</p> <p>5. Spaces between buildings are as important as density in the context of the character of an area.</p> <p>6. Replace "Respect the typical density intended" with "Conform to the typical density and graining".</p> <p><b>Representation:</b></p> <p><b>1. Page 77, Policy CS11, final paragraph. Object</b></p> <p>2. Sound No</p> <p>3. Effective No</p> <p>4. Berkhamsted Town Council strongly believes that the Character Area Assessments should remain as a source of planning guidance as they have served the development management decisions of the town well. If an Urban Design Assessment is used alone or in priority to the Character Area Assessments this would lead to significantly higher densities in the suburban areas of the town than has been allowed under current policies and Supplementary</p>			

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													<p>Planning Guidance. The Character Area Assessments should be retained as a source of planning policy in the new LDF and their efficacy should not be diluted in the context of the new Urban Design Assessments.</p> <p>5. In the final sentence include, after Urban Design, "and Character Area Assessments".</p>			
610088	Mr Martin Hicks	HBRC				Quality of Site Design	Policy CS 12	Policy CS 12	Objecting	No	b) Effective		Policy CS12 should also mention 'have due regard for any ecological issues that may be affected by proposals'.	Add: 'have due regard for any ecological issues that may be affected by proposals'	No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Quality of Site Design	CS12	Policy CS 12	Objecting	Yes	No	b) Effective	<p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes</p>	<p>Make reference to the Chilterns Buildings Design Guide and supplementary technical notes on Chilterns building materials in the delivery section on page 80.</p> <p>Reword (e) so that it states that development should plant suitable trees and shrubs to help assimilate a development more comfortably into its setting and to improve the appearance of settlement edges'.</p>	No, I do not wish to participate at the oral examination	

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													<p>mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve</p>			

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													and enhance its natural beauty.  This policy is concerned with the quality of site design and is generally supported. However, sub paragraph (e) suggests that planting would be sought to hide development ('plant trees and shrubs to softly screen development'). The Board objects to this statement and considers that it could usefully be reworded at the same time as making reference to the Chilterns Buildings Design Guide and supplementary technical notes on Chilterns building materials in the delivery section on page 80. The Board therefore considers that the text could be reworded to state that development should 'plant suitable trees and shrubs to help assimilate a development more comfortably into its setting and to improve the appearance of settlement edges'.			
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Quality of Site Design	CS 12	Policy CS 12	Supporting	Yes	Yes		This comment relates to Policy CS12: Quality of Site Design.  Our client supports the principles of the policy which is considered to set out appropriate site design requirements to ensure high quality of development is delivered over the plan period.  All of the site design requirements identified can be satisfied in relation to the proposed Local Allocation at West Hemel Hempstead.		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant

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																discussions at the Examination in Public.
515465	Mr Alan Kemp	Berkhamsted Town Council				Quality of Site Design	CS12	Policy CS 12	Supporting	Yes	Yes		<p>BTC regards these policies as a helpful consolidation and elaboration of many current policies relating to design and character.</p> <p><b>Representation:</b></p> <p><b>1. Pages 77-78, Policies CS10, CS11 except bullet point (a), and CS12, Support</b></p> <p>4. BTC regards these policies as a helpful consolidation and elaboration of many current policies relating to design and character.</p>		Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.
515465	Mr Alan Kemp	Berkhamsted Town Council				Paragraph	10.20	10.20	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>Berkhamsted Town Council strongly believes that the Character Area Assessments should remain as a source of planning guidance as they have served the development management decisions of the town well. If an Urban Design Assessment is used alone or in priority to the Character Area Assessments this would lead to significantly higher densities in the suburban areas of the town than has been allowed under current policies and Supplementary Planning Guidance. The Character Area Assessments should be retained as a source of planning policy in the new LDF in addition to the new Urban Design Guidelines and their efficacy should not be diluted in the context of the new Urban Design Assessments. The Character Area Assessments should be retained as a source of planning policy in the new LDF, in</p>		Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.

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													addition to the Urban Design SPD.  1. Replace "The Urban Design SPD which will update and supersede the Residential Character Appraisals" with "The Urban Design SPD which will update, complement and reinforce the Residential Character Area Assessments".			
610088	Mr Martin Hicks	HBRC				Quality of the Public Realm	Policy CS 13	Policy CS 13	Objecting	No	b) Effective		Policy CS13 should also include brown / green roofs in (f). (These may not always be visible but will, where possible, have a beneficial impact on the microclimate, water and ecological environments.	Add (f):  brown / green roofs		
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Quality of the Public Realm	CS12	Policy CS 13	Objecting	Yes	No	b) Effective	Potentially related to the above issue, we have some concerns about the policies and text discussing woodland and tree planting, which need more clarity. Woodland and tree planting can be effective as mitigation (Policy CS12 d) and e), CS13 f) , but we need to ensure that this is planting of appropriate species, in appropriate locations, suited to the environmental/ecological context, and that it will not have detrimental impacts on other habitats or species and will benefit ecological connectivity. This should be carried across to paragraphs 16.22 and 18.22, which both specify woodland or tree planting, but in different terms and for different aims. It would be better to consistently discuss appropriate woodland creation and tree planting as a means to deliver multiple benefits for nature and communities (eg. carbon sequestration, biodiversity enhancement and improved ecological connectivity, urban cooling, air quality, etc). In particular, the broader benefits and 'appropriateness' of planting must be referred to in the relevant Policies CS12 and CS13, to help ensure no perverse impacts from inappropriate woodland creation. We recommend:  CS12 d) " retain important trees or, if their loss is justified, replace them with a suitable number of a suitable species, in suitable locations to benefit ecological connectivity"; CS12 e) "plant trees and shrubs of an appropriate species in appropriate locations, to softly screen development and settlement edges and benefit biodiversity and ecological connectivity";	No, I do not wish to participate at the oral examination		

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													<p>ensure no perverse impacts from inappropriate woodland creation. We recommend:</p> <p>CS12 d) " retain important trees or, if their loss is justified, replace them with a suitable number of a suitable species, in suitable locations to benefit ecological connectivity";</p> <p>CS12 e) "plant trees and shrubs of an appropriate species in appropriate locations, to softly screen development and settlement edges and benefit biodiversity and ecological connectivity";</p> <p>CS13 f) "incorporation suitable trees, living walls and soft landscaping to increase wildlife value and benefit ecological connectivity".</p>	<p>CS13 f) "incorporation suitable trees, living walls and soft landscaping to increase wildlife value and benefit ecological connectivity".</p>		
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Quality of the Public Realm	CS13	Policy CS 13	Objecting	Yes	No	b) Effective	<p>Potentially related to the above issue, we have some concerns about the policies and text discussing woodland and tree planting, which need more clarity. Woodland and tree planting can be effective as mitigation (Policy CS12 d) and e), CS13 f) , but we need to ensure that this is planting of appropriate species, in appropriate locations, suited to the environmental/ecological context, and that it will not have detrimental impacts on other habitats or species and will benefit ecological connectivity. This should be carried across to paragraphs 16.22 and 18.22, which both specify woodland or tree planting, but in different terms and for different aims. It would be better to consistently discuss appropriate woodland creation and tree planting as a</p>	<p>It would be better to consistently discuss appropriate woodland creation and tree planting as a means to deliver multiple benefits for nature and communities (eg. carbon sequestration, biodiversity enhancement and improved ecological connectivity, urban cooling, air quality, etc). In particular, the broader benefits and 'appropriateness' of planting must be referred to in the relevant Policies CS12 and CS13, to help ensure no perverse impacts from inappropriate woodland creation. We recommend:</p> <p>CS12 d) " retain important trees or, if their loss is justified, replace them with a suitable number of a suitable species, in</p>	<p>No, I do not wish to participate at the oral examination</p>	



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													means to deliver multiple benefits for nature and communities (eg. carbon sequestration, biodiversity enhancement and improved ecological connectivity, urban cooling, air quality, etc). In particular, the broader benefits and 'appropriateness' of planting must be referred to in the relevant Policies CS12 and CS13, to help ensure no perverse impacts from inappropriate woodland creation. We recommend:  CS12 d) " retain important trees or, if their loss is justified, replace them with a suitable number of a suitable species, in suitable locations to benefit ecological connectivity"; CS12 e) "plant trees and shrubs of an appropriate species in appropriate locations, to softly screen development and settlement edges and benefit biodiversity and ecological connectivity"; CS13 f) "incorporation suitable trees, living walls and soft landscaping to increase wildlife value and benefit ecological connectivity".			
211660	Mr Garrick Stevens	Berkhamsted Town Council				Quality of the Public Realm	CS 13	Policy CS 13	Supporting	Yes	Yes		Policy CS13 Support		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
626821	Mr Neville	Paper Trail Trust	626819	Mr Chris	Maze Planning Ltd	Creating jobs and full employment	Section 11 Monitoring/Delivery	11	Objecting	No	No	a) Justified	<b>Monitoring/Delivery</b>  It is unsound because it is not Justified, Effective, Consistent with		No, I do not wish to participate at the oral	

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	Spiers			Watts									national policy.  Finally, the section dealing with delivery mechanisms seems very lightweight. No reference is made to potential funding from the Council, third parties, or government and in addition some reference needs to be made here to how the Council might use Section 106 contributions, or a future Community Infrastructure Levy (CIL) in a pro-active and flexible way to encourage new business initiatives and developments and so that they are not deterred from investing here.		examination	
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd	Creating jobs and full employment	Section 11	11	Objecting	No	No	a) Justified	<b>Strategic Objectives</b>  It is unsound because it is not Justified, Effective, Consistent with national policy.  It is considered that the strategic objectives set out on page 83 should also include encouraging sustainable tourism and employment generation through heritage initiatives and projects. This is underplayed in this part of the Core Strategy.		No, I do not wish to participate at the oral examination	
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd		Table 4	Table 4	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  Table 4 on page 84 should therefore be added to with reference to the role of sustainable tourism and heritage projects in the Dacorum column.		No, I do not wish to participate at the oral examination	
6073 46	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Paragraph	11.11	11.11	Objecting	No	No	b) Effective	This is not sufficiently <b>effective</b> .  While supporting this, we suggest in addition "The planning system will give preferential treatment to repair and servicing enterprises, whose general effect is to prolong the life of consumer durables and hence to	We suggest in addition "The planning system will give preferential treatment to repair and servicing enterprises, whose general effect is to prolong the life of consumer durables and hence to avoid wasting their embodied energy." (See	No, I do not wish to participate at the oral examination	

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													avoid wasting their embodied energy." (See <a href="http://www.inference.phy.cam.ac.uk/mackay/">http://www.inference.phy.cam.ac.uk/mackay/</a> for an explanation of the term "embodied energy".)	<a href="http://www.inference.phy.cam.ac.uk/mackay/">http://www.inference.phy.cam.ac.uk/mackay/</a> for an explanation of the term "embodied energy".)		
366491	Mr Brian Worrell					Paragraph	11.15, 11.16, 11.17 (Supporting Tourism)	11.15	Objecting	Yes	No	b) Effective	Please see my comments on Section 8. An opportunity is being missed to spell out a really creative vision of the role of tourism, particularly as it can be a significant driver for inward investment. But a lot more joined up thinking is required to pull all the strands together into one coherent tourism policy. As I understand it, there is not a Tourism Portfolio Holder, such is the focus on what tourism can bring.			
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Paragraph	11.15-11.17	11.15	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  Reference is made to tourism in paragraphs 11.15-11.17 but it is not comprehensive enough and should be expanded to add a reference to the importance of the town's industrial paper making heritage. The Trust has previously been concerned that no reference was made in the previous versions of the Core Strategy to the paper making industrial heritage of the Borough, and that it was the birthplace of paper making in the UK. The role of organisations such as the Paper Trail Trust should also be highlighted.		No, I do not wish to participate at the oral examination	
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Paragraph	11.16	11.16	Objecting	Yes	No	b) Effective	The phrasing of this paragraph is really weak. We've seen the contraction of bus services to destinations such as Ashridge and Whipsnade, and this will continue unless planning the Core Strategy is given more weight in this regard. Also, issues which relate closely to planning are also not being addressed, such as bus stops near	Many visitor destinations are currently accessed by car. The promotion of sustainable tourism aims to reduce this dependence by creating new opportunities for tourism in locations with good access to public transport; and by actively seeking to reduce car traffic to existing destinations through implementation of green	No, I do not wish to participate at the oral examination	

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													new developments (such as New Lodge in Berhamsted) or in the provision of cycle lanes with S106 money.	travel plans, use of S106 money to improve infrastructure, and through demand control measures such as parking charges in sensitive areas. In all cases the core strategy will strongly seek to protect and to enhance the natural environment.		
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Economic Development	CS 14	Policy 14	Objecting	No	b) Effective	This is not sufficiently <b>effective</b> . We need a sustainable economy that supports renewable technology and local production for local use. Employment should be well paid, with full workers' rights and recognition of trade unions. Every encouragement and support should be given for setting up co-operatives. There should be a mixture of manufacturing, farming, allotments and services. See our responses to 6.2 (local food) and 11.11 (Service and Repair industries)	Include commitments to promote a sustainable economy that supports renewable technology and local production for local use, that employment will be well paid, with full workers' rights and recognition of trade unions and that every encouragement and support will be given for setting up co-operatives and a mixture of manufacturing, farming, allotments and services.	No, I do not wish to participate at the oral examination		
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Economic Development	CS14	Policy 14	Supporting	Yes	Yes					
610882		Stanhope Plc and Aviva	610880	Mr Philip Allard	Planning Perspectives	Economic Development	Policy CS14: Economic Development	Policy 14	Objecting	Yes	No	b) Effective	Whilst the role of Hemel Hempstead as the main focus for new economic development initiatives is welcomed, the Core Strategy must recognise that the land use allocations in Hemel Hempstead have not changed over the past 15 years (previous plan period). The land use allocations in the Dacorum Local Plan have not been flexible in allowing different types employment generating development to come forward.  It is a concern that the indicator for Policy CS14 will be the net change in B1(a), B2 and B8 floorspace. It is not considered that B Use Classes alone can provide the economic development and jobs needed in	A flexible approach to economic development will need to be taken where there is no demand for office floorspace. The delivery of policy CS14 will also require engagement with landowners and developers to ascertain what is possible. This should be identified on pages 87-88.	Yes, I wish to participate at the oral examination	This policy has a direct impact on the Peoplebuilding site, an important and major site within the Borough.

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													<p>Hemel Hempstead. In particular, there is an over supply of office accommodation and lack of demand which means that sites restricted to Class B1(a) floorspace will not be developed in the foreseeable future.</p> <p>As specified in our representations for Policy CS34, strategic policies need to be sufficiently flexible to allow alternative employment uses such as C1 (hotels), A1 (foodstores), C2 (care facilities), D1 (residential institutions), B8 (storage or distribution) and sui generis uses such as car showrooms to come forward to plug the gap and generate new jobs. Clearly, the design of any alternative employment uses would need to be carefully considered to enhance the visual image of Hemel Hempstead upon arrival; either through building design alone or complemented by high quality landscaping.</p> <p>Permission already exists for B1 (a) offices on the Peoplebuilding site and there has been insufficient demand for offices on this site over the past 9 years to speculatively build additional buildings. Therefore, the majority of the consented buildings have not been built out. Without allowing the generation of jobs through flexibility in employment use classes, sites (such as Peoplebuilding) in the Maylands Gateway area will remain vacant and undeveloped for the foreseeable future. Given that these sites form the Gateway to Hemel Hempstead it is essential that development comes forward to assist in attracting inward investment.</p>			
611549	Ms J	Three Rivers District				Economic Development	CS14	Policy 14	Supporting	Yes	Yes		Employment growth and regeneration of the Maylands Business Park are supported, and it			

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	Bowyer	Council											is noted that they may contribute to meeting employment needs of surrounding areas.			
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	Economic Development	CS14	Policy 14	Supporting	Yes	Yes		<p>USS notes the changes in employment floorspace as a result of the removal of the East of England Regional Spatial Strategy figures. The Pre-submission Core Strategy draft now refers to the 'Dacorum Employment Land Update, 2011' completed by Roger Tym &amp; Partners, which contains revised figures for employment floorspace and jobs in the Borough. Specifically, USS notes that the revised forecast of 10,000 employment opportunities (2006-2031) will primarily be office-based due to the decline in industrial and warehousing activity in the borough.</p> <p>USS continues to support Policy CS14 which will be used to support the regeneration of the Maylands Business Park and Hemel Hempstead town centre.</p>			
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Economic Development	CS 14	Policy 14	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective, Consistent with national policy.</p> <p><b>CS14</b></p> <p>The Trust is the freehold owner of vacant land which comprises part of the former John Dickinson Mill, and Apsley Mill Cottage, at Apsley. The site was made available to the Trust by the developers of the John Dickinson Mills pursuant to the terms of a planning agreement, and the Trust also has the benefit of shared car parking and access rights across land which has since been developed as car parking and access in connection with the redevelopment of the site for</p>	No, I do not wish to participate at the oral examination		

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													<p>residential development, offices, a public house and an hotel.</p> <p>The vacant land in question forms part of a Proposals Site numbered TWA7 in the Local Plan, and linked directly to Policy 31 in the Local Plan. The Local Plan and TWA7 in particular envisage that the land within TWA7 would be developed for a visitor centre and museum related to the paper industry, with further redevelopments for a mix of uses, including offices, hotel, restaurant, and other visitor facilities. Some residential units were also seen as being acceptable, and indeed a mix of uses including a high density residential scheme has already been permitted and developed here within TWA7.</p> <p>However since the time of the previous representations made by the Trust, events have significantly shifted, not only nationally, but locally. Planning permission has now been granted for a visitor centre and museum at Frogmore Mill, and that facility has now been successfully developed at Frogmore Mill. It remains the objective of the Trust to achieve a major step change in visitors attracted to use the Paper Trail, and to ensure that the new Visitor Centre and Museum are major developing heritage attractions in the Borough. Indeed, further future phases of related development work are planned.</p> <p>In addition, the Council has commissioned various Employment Land studies since 2007, which have in some cases come to the view that there is a substantial oversupply of proposed employment floor space in the period leading up</p>			

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													<p>to 2026, (the Core Strategy period) an excess of 28%, as well as confirming a lack of market demand for offices, in particular. This is likely to continue to be the long term position given the plentiful supply of vacant offices in the Borough, and Hemel Hempstead in particular.</p> <p>One of those studies, the London Arc Employment Land Study, undertaken in 2009 also concluded that any new offices in the Borough should be located away from current concentrations in Hemel Hempstead and Maylands for example. These later studies are much more relevant and up to date than the earlier 2005 South West Herts Employment Land Study.</p> <p>In order to ensure that the Trust can properly finance and manage its heritage and other employment generating facilities here permanently in the long term, it must secure a viable planning permission for the redevelopment of the vacant land it holds.</p> <p>It has undertaken early pre-application consultations with the Council over two years ago, but funding to continue this consultation process could not be secured until more recently. The Trust is now in a position to prepare such a planning application, in outline, for a mix of uses which would include a significant residential component in order to be viable.</p> <p>However at the same time the Trustees consider that as a long standing key partner with the Council on a number of levels, the Trust should assist the local planning authority with its plan making, so that an up to date Core</p>			



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													<p>Strategy can be adopted in due course.</p> <p>The Trustees believe that it is in the interests of the Trust and the Council as well, that the Core Strategy, and any subsequent updated Site Allocations DPD, and Development Management Policies DPD should ensure that the plans being prepared by the Trust for its vacant site could be approved, and be seen to be in compliance with the Core Strategy DPD, even if at present they would appear, in the Council's view, to be in conflict with the adopted Local Plan, and TWA7 proposals in particular because of the inclusion of further residential development.</p> <p>It should be noted however that the local Plan was adopted in 2004 and is intended to guide development up to 2011 only. It has in many respects already become out of date in relation to economic circumstances in the Borough.</p> <p>The remainder of these representations deal in turn with the constituent parts of the Core Strategy in its Pre-Submission form, and the Trustees would comment as follows on each section as affects the long term priorities and objectives of the Trust:</p> <p>Policy CS14 has adopted a target of 10,000 new office jobs to be achieved by 2026. However, I feel that this is unrealistic and likely not to be met given the current vacancy levels of offices in the Borough and surrounding local authority areas, and evident lack of demand. The Roger Tym &amp; Partners Study in 2011 also only forecasts 7,000 new office jobs likely to be created in the</p>			

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													<p>Borough up to 2031.</p> <p>However as long as the target is monitored for delivery, and that sites which are unlikely to be taken up for new office developments are not artificially kept vacant through resistance to other alternative uses by the Council, then it is considered that this figure, as a target, could be retained.</p> <p><b>Monitoring/Delivery</b></p> <p>Finally, the section dealing with delivery mechanisms seems very lightweight. No reference is made to potential funding from the Council, third parties, or government and in addition some reference needs to be made here to how the Council might use Section 106 contributions, or a future Community Infrastructure Levy (CIL) in a pro-active and flexible way to encourage new business initiatives and developments and so that they are not deterred from investing here.</p>			
4943 10	Mr Elliot Jones	Barratt Strategic	4942 84	Mr Elliot Jones	Rapleys LLP	Economic Development	CS 14	Policy 14	Supporting	Yes	Yes		<p>This comment relates to Policy CS14: Economic Development</p> <p>Our client supports the level of employment development identified in the Core Strategy and the proposal to locate the majority of this development at Hemel Hempstead. This is considered to be a sound approach that will deliver the most sustainable pattern of living for the Borough.</p> <p>However, in parallel, there needs to be an appropriate level of housing development to ensure balanced and sustainable growth. The increased workforce should be able to access living accommodation which is convenient and highly</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore</p>

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													accessible. Hence, the importance of delivering the Local Allocations within an appropriate timeframe.			welcome the opportunity to participate in all relevant discussions at the Examination in Public.
633333	Mr Paul Harris	Dacorum Green Party				Economic Development	CS14	Policy 14	Objecting	Yes	Yes		It must be a sustainable economy that supports renewable technology, with local production for local use. Employment should be well paid with full worker rights and recognition of trade unions. Every encouragement and support should be given for setting up co-operatives. There should be a mixture of manufacturing, farming, allotments and services.	Diversity of occupation is very welcome, but with new technology you can only create a situation of nil unemployment with reduction in working hours. This will lead to more leisure time and the opportunity for people to become more active, a greater quality of life for all.	Yes, I wish to participate at the oral examination	I like to make a personal appearance.
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd	Paragraph	Paragraph 12.1	12.1	Objecting	Yes	No	b) Effective	<p>We note the reference in Paragraph 12.1 to the former Hicks Road Industrial Estate continuing to be identified as a GEA (albeit, remodelled to reflect the current Masterplan aspirations).</p> <p>However, whilst the Masterplan proposals (and indeed the current planning application) seek to retain some employment uses (largely within Sharose Court) as part of the mixed-use redevelopment of the Hicks Road site, it is unlikely that the site will continue to function as a GEA. Indeed, the Hicks Road Industrial Estate has already experienced a lengthy period of decline, with the majority of buildings currently vacant and/or in a poor state of repair.</p> <p>The current proposals will provide modern employment space - and will provide local employment opportunities (potentially generating a greater number of jobs than currently on-site) - but the future development is unlikely to be perform the role of a GEA in the</p>	Remove reference to the Hicks Road site being identified as a GEA - and rather allow the future redevelopment of the site be guided by the Hicks Road Masterplan and Site Specific Policy set out in Strategic Site Allocation SS2.	Yes, I wish to participate at the oral examination	Our client (Zog Brownfield Ventures Ltd) is a significant land holder within the Borough and is currently pursuing the redevelopment of the Hicks Road Industrial Estate (identified as Strategic Site SS2 in the Pre-Submission Core Strategy).

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													long-term (particularly when compared to the functioning of the other GEA's in the Borough).			
610882		Stanhope Plc and Aviva	610880	Mr Philip Allard	Planning Perspectives	Offices, Research, Industry, Storage and Distribution	Policy CS15: Offices, Research, Industry, Storage and Distributio	Policy CS 15	Objecting	Yes	No	b) Effective	It is identified in paragraph 12.3 that General Employment Areas (GEAs) are sometimes the most appropriate location for non B-class uses such as car showrooms, hotels and bulky goods retail uses. However, only allowing these uses as an exception to policy will mean that designated office areas in Maylands will remain undeveloped given the level of demand from office occupiers and the over supply of office accommodation. In order to ensure that the Gateway sites come forward greater flexibility is essential.	Policy CS15 should be reworded to state that: " <i>New office uses and other employment generating uses (where necessary) will be allowed in core office locations and Hemel Hempstead town centre subject to high standards of design</i> ". This rewording is required if the objective of transforming Maylands Gateway to create a prominent employment location is to be realised within the proposed plan period.	Yes, I wish to participate at the oral examination	This policy will have a direct impact on the Peoplebuilding site, an important and major site within the Borough.
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Offices, Research, Industry, Storage and Distribution	CS15	Policy CS 15	Supporting	Yes	Yes					
502874	Mr Chris Bearton	Hertfordshire County Council				Offices, Research, Industry, Storage and Distribution	CS15	Policy CS 15	Objecting	No	No		Regarding the protection of general employment areas for B-class uses as in Policy CS15, it should be acknowledged that this could include waste management facilities which are deemed to be compatible in particular in areas of B2 and B8. This approach would reflect that set out in the Waste Core Strategy and Development Management Policies and being pursued through the Hertfordshire Waste Site Allocations DPD. As such, waste management facilities would not be restricted within such locations as they would be considered to be a specific permissible use.			
503254		Royal Mail	625562	Ms Lisa Bowden	BNP Paribas Real Estate	Offices, Research, Industry, Storage and Distribution	CS15	Policy CS 15	Objecting	Yes	No		This Policy identifies the areas to provide Class B uses and states that at least 131,000 sq.m of net additional office floorspace with be provided in the plan period. Further, the policy states that there will be no	This request accords with the following, including:  PPS4, which details that LPAs should plan positively and proactively		

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													<p>net loss of industry, storage and distribution floorspace over the plan period.</p> <p>Royal Mail supports the protection of B Class uses. However, we consider that the Policy as currently worded does not provide the opportunity for sites that are no longer suitable for employment use and / or surplus to requirement to come forward for development for alternative uses. We are of the opinion that the approach adopted by the Council may be ineffective and therefore (arguably) inconsistent with national policy given that in its current</p> <p>format it could prevent development from coming forward.</p> <p>We therefore request that flexibility is built into the Policy to enable employment sites that are no longer suitable for such use and / or surplus to requirement to come forward for alternative uses / redevelopment subject to tests of feasibility and viability. We consider this policy approach to be consistent with national policy.</p>	<p>to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies which are able to respond to economic change and notes the need for co-ordination with infrastructure;</p> <p>Policy EC.2 (d) of PPS4, which states that LPAs should "seek to make the most efficient and effective use of land, prioritising previously developed land which is suitable for re-use"; and</p> <p>Policy EC.2 (h) of PPS4, which states that "at the local level, where necessary to safeguard land from other uses ... a range of sites [should be identified] to facilitate a broad range of economic development, including mixed use. Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period".</p> <p>Para 10 of Planning Policy Statement 3: Housing (PPS 3), which states that the planning system should deliver "a flexible, responsive supply of land - managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate".</p>		

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														and Para 44 of PPS 3 identifies that "in developing their previously-developed land strategies, Local Planning Authorities should consider a range of incentives or interventions that could help to ensure that previously-developed land is developed in line with the trajectory/ies. This should include...considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development."		
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	Offices, Research, Industry, Storage and Distribution	CS15	Policy CS 15	Supporting	Yes	Yes		Whilst USS acknowledges the reduction in industrial and warehousing based employment, USS remains supportive of policies that seek to retain existing commercial units. USS supports this approach in principle, however continues to urge the Council to maintain flexibility in policy when considering alternative uses at employment sites.			
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Offices, Research, Industry, Storage and Distribution	CS 15	Policy CS 15	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  It should be noted that PPS4 requires a much more flexible approach to economic development, and that sites which are not capable of early take up for uses within the Business Use Class should be allowed to be developed for much more viable mixed uses, even if these include a small proportion of B1 Offices. The only reference found in this version of the Core	No, I do not wish to participate at the oral examination		

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													<p>Strategy to PPS4 and national planning guidance therein, is at the start of this Chapter as a reference for the definition of sustainable growth. This is a major omission. There is no reference anywhere either as to how the Council is responding to the requirements of 'Planning for Growth', March 2011.</p> <p>On the above basis, it is considered that policy CS15 should also include a reference to mixed uses being encouraged in GEA's, especially where residential development could make a scheme viable and deliverable, and which could be designed to have appropriate car parking and amenity space provided, and which did not undermine the businesses to which it would relate spatially, whereas if only offices or other employment uses were proposed, they would not be viable financially.</p> <p><b>Monitoring/Delivery</b></p> <p>Finally, the section dealing with delivery mechanisms seems very lightweight. No reference is made to potential funding from the Council, third parties, or government and in addition some reference needs to be made here to how the Council might use Section 106 contributions, or a future Community Infrastructure Levy (CIL) in a pro-active and flexible way to encourage new business initiatives and developments and so that they are not deterred from investing here.</p>			
333991	Mrs Christa Masters	STANDARD LIFE INVESTMENTS LTD C/O MONTAGU EVANS LLP	333985	MRS CHRISTA MASTERS	STANDARD LIFE INVESTMENTS LTD C/O MONTAGU EVANS LLP	Paragraph	13.2	13.2	Supporting	Yes	Yes		The reference to the role of Hemel Hempstead town centre in the Borough as a whole is supported.			

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610564	Mr Jay Doshi					Paragraph	13.3	13.3	Objecting	Yes	No			Local centres with neighbourhood shopping function which provide range of mainly small size (YET VERY ESSENTIAL) shops, services and facilities of a local nature serving a small catchment MUST BE ACTIVELY SUPPORTED AND ENCOURAGED AND WITHOUT LOSING ITS CURRENT NATURE AND IDENTITY. THIS WOULD ALLOW ADEQUATE ACCESS TO ESSENTIAL SERVICES LIKE OBTAINING PRESCRIPTIONS AND MEDICAL ADVICE FROM A PHARMACY TO LOCAL RESIDENTS	Yes, I wish to participate at the oral examination	As a pharmacist and a local business man I would be able provide reasons why local shops are so vital to community's welfare and why/how they can be supported.
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills		Table 5	Table 5	Objecting	Yes	No	a) Justified	It is not sound as it is not Justified, Effective or Consistent with national policy.  Development proposals at land to the south of Berkhamsted include a shopping parade which accords with the retail role identified in paragraph 13.1 of the draft CS in terms of providing services and facilities to serve local communities. The Concept Plan identifies a local neighbourhood centre consisting of a mix of A1-A5 land uses to include up to three or four small convenience shops to serve the new local residents and existing residents to the south of the town.  In order to make the Core Strategy justified, effective and consistent with national policy (namely PPS4), draft Table 5 should additionally include South Berkhamsted as a "Local Centre with a neighbourhood shopping function". This by definition and function is retail provision which simply caters for local needs of a very local nature either in the form of a local neighbourhood centre or a local parade to serve the new	The last row of Table 5 should also include South Berkhamsted as a location.	Yes, I wish to participate at the oral examination	It is necessary as the above relates to changes to the Core Strategy Plan in relation to future development growth across the borough.



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													development itself. The sequential approach will not therefore be used to assess applications for new retail development as part of development proposals at Land South of Berkhamsted.			
211660	Mr Garrick Stevens	Berkhamsted Town Council					Table 5	Table 5	Supporting	Yes	Yes		P93 Para 13.4 Table 5 Retail Hierarchy Support.		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
398369	Mr Charles Staveley	Capital & Regional Plc	619906	Mr Jonathan Best	Blue Sky Planning		Table 5	Table 5	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>The current Local Plan identifies Jarman Fields as a Local Centre with a district shopping function. The draft Core Strategy proposes re-designating Jarman Fields as an out of centre location. Capital &amp; Regional objects to this change and proposes that the Local Plan designation is retained. Following the Local Plan Inspector's consideration of this matter there has been no material change in the definition of District centre which justifies re-designating it. Furthermore, the role of the centre has been enhanced, has permission to enhance further and there is firm landowner interest in the significant improvement and diversification of Leisure World within the centre. In other words, Jarman Fields better serves the public now than when the inspector considered it in 2002 and further improvements are approved and proposed.</p> <p>The Council does not appear to have undertaken any assessment of the alternative planning strategies, such as retaining the existing</p>	Jarman Fields should be deleted from Table 6, and identified in Table 5 as a local centre with a district shopping function.	Yes, I wish to participate at the oral examination	It is not sound because it is not Justified or Consistent with national policy.

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													designation of Jarman Fields.  Accordingly, Capital & Regional considers that the proposed change to the designation of Jarman Fields to be unjustified and inconsistent with National Policy.			
621338		Total Pension Trustee	619906	Mr Jonathan Best	Blue Sky Planning		Table 5	Table 5	Supporting	Yes	Yes		Total Pension Trustees owns land at the Heart of Maylands and has held discussions with Officers regarding the potential future uses of it.  Total Pension Trustees supports the Council's objectives of delivering a Local Centre at the Heart of Maylands. It considers that such a centre will provide shopping and other facilities for the existing workforce of Maylands, visitors to it as well as people living in the local area.  Notwithstanding its support for the proposed local centre, Total Pension Trustees recognises that development of new local is often difficult to achieve and there considers that the Council, through the East Hemel Hempstead Area Action Plan, will need to provide a flexible approach to its planning requirements for the area in order to facilitate the delivery of the new Local Centre.		Yes, I wish to participate at the oral examination	
630428	CSC Harlequin LTD		630424	Miss Hannah Fortune	Nathaniel Lichfield and Partners Ltd.	Paragraph	paragraph 13.5	13.5	Objecting	Yes	No	b) Effective	It is unsound because it is not Effective, Consistent with national policy. PPS4 sets out that retail uses should be directed to the Primary Shopping Area of defined centres In the first Instance. To accord with national policy, and to therefore be "sound", this text should confirm that within the town centres the main shopping frontage equates to the Primary Shopping	A sentence should be added to read:  "The Main Shopping Frontages of the town centre equate to the Primary Shopping Area as defined by PPS4".	No, I do not wish to participate at the oral examination	

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													Area as defined by PPS4.			
499516	Sainsbury's	Sainsbury's	398364	Mr Sean McGrath	Indigo Planning	Paragraph	13.7	13.7	Objecting	Yes	No		<p>The Council identify a number of well used out-of-centre retail locations in Hemel Hempstead and state that significant new retail development or changes to the type of goods that are currently sold will not be allowed at these locations.</p> <p>The function of the Core Strategy is not to prevent development. The Core Strategy should acknowledge that any proposals for new retail development must comply with the tests of PPS4. Therefore, it is unreasonable for the Council to state that new retail development will not be allowed in out of centre locations.</p>			
211660	Mr Garrick Stevens	Berkhamsted Town Council					Table 6	Table 6	Objecting	Yes	No		<p>Consideration should be given to measures that will provide for sustainable out-of-centre retail and leisure locations in the non-Hemel Hempstead areas to reduce reliance on vehicles to access distant premises.</p> <p>P95 Out of centre retail. Objection.</p>		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and housing allocations are discussed.
398369	Mr Charles Staveley	Capital & Regional Plc	619906	Mr Jonathan Best	Blue Sky Planning		Table 6	Table 6	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>The current Local Plan identifies Jarman Fields as a Local Centre with a district shopping function. The draft Core Strategy proposes re-designating Jarman Fields as an out of centre location. Capital &amp; Regional objects to this change and proposes that the Local Plan designation is retained. Following</p>	Jarman Fields should be deleted from Table 6, and identified in Table 5 as a local centre with a district shopping function.	Yes, I wish to participate at the oral examination	It is not sound because it is not Justified or Consistent with national policy.

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													<p>the Local Plan Inspector's consideration of this matter there has been no material change in the definition of District centre which justifies re-designating it. Furthermore, the role of the centre has been enhanced, has permission to enhance further and there is firm landowner interest in the significant improvement and diversification of Leisure World within the centre. In other words, Jarman Fields better serves the public now than when the inspector considered it in 2002 and further improvements are approved and proposed.</p> <p>The Council does not appear to have undertaken any assessment of the alternative planning strategies, such as retaining the existing designation of Jarman Fields.</p> <p>Accordingly, Capital &amp; Regional considers that the proposed change to the designation of Jarman Fields to be unjustified and inconsistent with National Policy.</p>			
499516	Sainsbury's	Sainsbury's	398364	Mr Sean McGrath	Indigo Planning		Table 6	Table 6	Objecting	Yes	No		<p>The Council identify a number of well used out-of-centre retail locations in</p> <p>Hemel Hempstead and state that significant new retail development or changes to the type of goods that are currently sold will not be allowed at these locations.</p> <p>The function of the Core Strategy is not to prevent development. The Core</p> <p>Strategy should acknowledge that any proposals for new retail development</p> <p>must comply with the tests of PPS4. Therefore, it is unreasonable for the</p>			

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													Council to state that new retail development will not be allowed in out of centre locations.			
630428	CSC Harlequin LTD		630424	Miss Hannah Fortune	Nathaniel Lichfield and Partners Ltd.	Paragraph	paragraph 13.9	13.9	Objecting	Yes	No	b) Effective	It is unsound because it is not Effective, Consistent with national policy.  The paragraph directs retail developments to "more central localions" first but does not clearly define what these locations are. This is unclear and therefore not effective, and is also not consistent with national policy which directs new retail development to the primary shopping areas of defined centres first. This paragrpah is therefore unsound.	"The sequential approach requires new retail development to be delivered to primary shopping areas within defined centres first: ....  1. Locations within the main shopping frontages of existing town centres and within the centre boundaries of the smaller district and local centres"	No, I do not wish to participate at the oral examination	
333991	Mrs Christa Masters	STANDARD LIFE INVESTMENTS LTD C/O MONTAGU EVANS LLP	333985	MRS CHRISTA MASTERS	STANDARD LIFE INVESTMENTS LTD C/O MONTAGU EVANS LLP	Shops and Commerce	Monitoring/Delivery	Policy CS 16	Supporting	Yes	Yes		Reference is made to the preparation of the Marlowes Shopping Zone Improvement Plan - as a key landowner in the town, Standard Life Investments Plc would request that they are involved with the preparation of such a document.			
211053	unknown	Wm Morrison Supermarkets plc	628141	Mr Anthony Ferguson	Peacock & Smith	Shops and Commerce	CS16	Policy CS 16	Objecting	Yes	No	c) Consistent with national policy	The following sentences are challenged:  "New retail development will be assessed in terms of location, <b>scale</b> and impact".  "New retail floorspace will only be permitted outside of defined town centres if the proposal complies with the sequential approach and <b>demonstrates a positive overall outcome in terms of the impact assessment</b> ."	To make policy CS16 consistent with the policy direction in PPS4 it should be revised to read:  "New retail development will be assessed in accordance with national policy, as set out in PPS4. It will be required to satisfy the key policy tests of the sequential approach and impact, where necessary."	No, I do not wish to participate at the oral examination	

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620322		West Herts College	620319	Ms Alison Tero	CBRE	Shops and Commerce	CS16	Policy CS 16	Objecting	Yes	No		WHC supports the opportunity to provide 47,500 sq m net comparison and 6,000 sq m net convenience floorspace in Hemel Hempstead to 2031 however it should be made that these are not an absolute or maximum floorspace threshold as PPS4 does not require the assessment of 'need' to be demonstrated as part of retail impact assessments. Proposals above the quantum's identified in policy CS16 could be acceptable where they demonstrate compliance with the wider PPS4 policy tests and the overarching local and national objectives for sustainable economic growth.		Yes, I wish to participate at the oral examination	West Herts College (WHC) would like to participate at the oral part of the Examination if its proposed recommendations (as set out in these representations) are not included in the Submission version of the Core Strategy.  WHC would like the opportunity to set out its reasoning for the recommendations made in its representations to ensure that the policies and vision set out in Core Strategy are considered 'sound' and that they support WHC's proposals for its Dacorum Campus.
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Shops and Commerce	CS16	Policy CS 16	Objecting	Yes	No	a) Justified	It is not sound as it is not Justified, Effective or Consistent with national policy.  Development proposals at land to the south of Berkhamsted include a shopping parade which accords with the retail role identified in paragraph 13.1 of the draft CS in terms of providing services and facilities to serve local communities. The Concept Plan identifies a local neighbourhood centre consisting of a mix of A1-A5 land uses to include		Yes, I wish to participate at the oral examination	It is necessary as the above relates to changes to the Core Strategy Plan in relation to future development growth across the borough.

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													<p>up to three or four small convenience shops to serve the new local residents and existing residents to the south of the town.</p> <p>In order to make the Core Strategy justified, effective and consistent with national policy (namely PPS4), draft Table 5 should additionally include South Berkhamsted as a "Local Centre with a neighbourhood shopping function". This by definition and function is retail provision which simply caters for local needs of a very local nature either in the form of a local neighbourhood centre or a local parade to serve the new development itself. The sequential approach will not therefore be used to assess applications for new retail development as part of development proposals at Land South of Berkhamsted. It is considered that retail policy and supporting text in the Pre-Submission CS should identify the PPS4 thresholds for new retail developments being considered against the sequential approach and impact assessments (at 2,500 square metres and above). This should be cited in policy for clarity and certainty.</p> <p>It is considered that retail policy and supporting text in the Pre-Submission CS should identify the PPS4 thresholds for new retail developments being considered against the sequential approach and impact assessments (at 2,500 square metres and above). This should be cited in policy for clarity and certainty.</p>			
6304	CSC		6304	Miss Nathaniel		Shops and	CS 16	Policy	Objectin	Ye	No	b)	It is unsound because it is not		No, I do not	

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28	Harlequin LTD		24	Hannah Fortune	Lichfield and Partners Ltd.	Commerce		CS 16	g	s		Effective	<p>Justified, Effective, Consistent with national policy. Policy CS16 sets out retail floorspace projections up to 2031. Meeting growth projections between 2009 and 2021 should remain the priority i.e. projections over the next 10 years.</p> <p>Long term projections up to 2031 should be treated with caution. Long term forecasts may be more susceptible to change, due to unforeseen circumstances.</p> <p>Projected surplus expenditure beyond 2021 is attributable to project growth in spending per capita and forecast population growth. If the growth in population or expenditure is lower than forecast then the scope for additional floorspace will reduce. Long term projections should be monitored and kept under review. The implications of major retail development within and surrounding the borough should also be monitored and the effects of these proposals may have on the demand for additional development in Dacorum should be considered carefully.</p> <p>This view is supported by the Council's Evidence Base. The Retail Study Update (2011) clearly sets out that while forecasts are provided up to 2031, limited reliance should be placed on expenditure and capacity estimates over these longer time horizons and certainly beyond 10 years (para, 3.7), PPS4 guidance is also clear that retail capacity should be regularly reviewed and updated at least every 5 years.</p> <p>On the basis of the above as it stands this policy is not justified as</p>		wish to participate at the oral examination	



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													It does not provide the most appropriate strategy; is not effective as it does not outline the need to monitor and review long term projections; and It not consistent with national policy (PPS4) which states that retail capacity should be regularly reviewed. This policy is therefore unsound.			
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd	Providing homes	Section 14	14	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  The Strategic Objectives set out on page 103 are insufficient in the Trustees' view. The Objectives need to be expanded to make reference to the need to prioritise brown field and previously developed sites for housing, in order to reinforce the sustainability credentials of the Core Strategy and meet national guidance in PPS1 and PPS3. In addition, there needs to be some reference to locational priorities.		No, I do not wish to participate at the oral examination	
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd	Providing homes	Section 14 Providing Homes - Delivery Section in Housing	14	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  Finally, again there is no reference in the delivery section to the flexible and pro-active use of Section 106 Contributions to reflect viability of schemes and to ensure that as many as possible come forward and are delivered on the ground.		No, I do not wish to participate at the oral examination	
6106 62	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	14.6	14.6	Supporting	Yes	Yes		In terms of Berkhamsted, BRAG fully supports DBC's findings in the updated SHLAA. In comparison, alternative reports commissioned by developers are based on unsound assumptions, including the ability to widen narrow roads when it is not feasible, ignoring site topography and reclassifying pure Green Belt land containing protected historic landmarks as "quasi-brownfield".		Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.

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607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Paragraph	Section 14.7 (and more generally)	14.7	Objecting	No	a) Justified	<p>This is not <b>justified</b> .</p> <p>DEF believes that the housing requirements in the borough are substantially over estimated. This can be evidenced in the following ways.</p> <p>The 2003 Housing Needs Survey for the current period identified that there was an annual need of affordable housing of 710 new homes per annum. However, the supply of all housing (including private and affordable housing) for the period April 2001 to March 2010 was 3,225 (322 new homes per year) (source, Housing Land Availability Paper - Dacorum 2011).</p> <p>Therefore the amount of housing being provided in the District was less than half that claimed as required by the 2003 Housing Needs survey for affordable housing only.</p> <p>Despite the substantial shortfall in housing supply, the waiting list for the District remained broadly stable over the decade. E.g. during the period 1997 to 2006 the figure of households on the Council's waiting list varied from a high of 3,465 in 2003 to a low of 2,398 in 2006. The Council will point to an increase on the waiting list from 2007 to 2009 from 4,413 to 5,374. These increases are explained by the Department of Communities and Local Government (DCLG) Statistics' own data as being caused</p>	Correct the methods currently used to predict future housing demand, as detailed above.	No, I do not wish to participate at the oral examination		

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													<p>by the introduction of choice based lettings, which increased the number of households on the list, including those previously under-represented, e.g. those in employment. The DCLG data also refers to households remaining on the list after they have been housed, and the removal of the statutory duty on local authorities to update their waiting lists. In other words, the way that data has been collected since 2006 has changed, and the increases shown cannot be relied upon to reflect any true increase in housing demand.</p> <p>Another way of measuring housing demand is by looking at the number of households accepted by a local authority as statutorily homeless, and the number of households in temporary accommodation. DEF suggest that a genuine increase in the size of the waiting list would be expected to be accompanied by an increase in the number of households being accepted as statutorily homeless by the Borough. DCLG data for Dacorum for the period of 2004-2001 appears to show a different story. Households accepted as statutorily homeless in Dacorum over the whole of this period were 419 (an average of 57 per year over this period. However, the numbers of statutorily homeless households accepted by the Borough over the last 3 years, when according to their figures the waiting list has been increasing, was 76 (an average of 25 per year).</p> <p>To conclude: the examples provided</p>			

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													above of data for recent supply against predicted demand shows that, despite a substantial claimed under-supply of housing in Dacorum, there was no material evidence of a housing shortage, and that this fact is supported by the very small numbers being accepted in Dacorum as statutorily homeless. We therefore believe that there is good evidence to show that the methods used for measuring future housing demand are flawed and should be robustly reviewed before the numbers of homes required are fixed at the levels proposed. From our review of current demand and supply, we believe that the methods currently used to predict future housing demand would lead to a substantial over-supply of housing in the area.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	14.9	14.9	Supporting	Yes	Yes		Refer to BRAG submission for paragraph 1.4			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	14.9	14.9	Supporting	Yes	Yes		In terms of housing supply, DBC has provided HCC with detailed information relating to housing trajectories, locations, phasing and anticipated yields of sites. This has enabled HCC to respond in some detail relating to the level of existing school provision that it would be prudent for the LPA to make provision for across the plan period to 2031. (That detail was contained at paragraphs 5.4 to 5.28 of the representations submitted in November 2010 for Hemel Hempstead and paragraph 5.33 for Berkhamsted).		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the

Person ID	Full Name	Organisation	Person ID	Full Name	Organisation	Title	What Section-2? - Please specify the paragraph number and/or policy reference which you wish to comment on.	Online System Number	Question 1 - Are you (please tick one)	Question 2 - a) Legally Compliant	Question 2 - b) Sound	Question 3 - Do you consider that the Core Strategy is unsound because it is not:	Question 4 - Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible.	Question 5 - Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound.	Question 6 - If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?	Question 7 - If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.
																critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	14.9	14.9	Objecting	Yes	No	a) Justified	The proposed target of 10,750 new homes is excessive and should be reduced to the level of Option 1 in the Draft Core Strategy (9,835) supported by CPRE Hertfordshire. Although this lower level of provision is only 37 dwellings per year lower than the number proposed by the Council, it avoids the fundamental policy change of removing land from the Green Belt through site allocations. CPRE Hertfordshire does not consider the higher level of housing is justified when seeking to meet local need and demand sufficient to meet the Challenges set out in Section 4 of the Core Strategy.	Amendments to the housing target to 9.835 in the period covered by the Core Strategy, and to Tables and Appendices, should be made, including deletion of specific local allocations in the Green Belt from Table 9.	Yes, I wish to participate at the oral examination	To ensure that the Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	14.15	14.15	Supporting	Yes	Yes		The linking of delivery of housing sites with infrastructure, and the fact that more detailed requirements will be set out in the Site Allocations DPD is welcomed and supported. The fact is that DBC has identified the need for additional service provision, particularly primary school capacity, within the PSCS.		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order

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																to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 14.15	14.15	Supporting	Yes	Yes		P105 Para 14.15 Supporting  It is vitally important that development of housing sites will be co-ordinated with associated infrastructure and services, even if investment is at some remove from the immediate site[s].		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Paragraph	14.16 (and section 14 more generally)	14.16	Objecting	No	a) Justified		This is <b>unjustified</b> , since the housing demand figures, based on the regional Strategic Housing Market Assessment (SHMA), are unsound.  The Executive Summary of SHMA	Correct the methodology and in consequence revise the housing demand downward as detailed above.	No, I do not wish to participate at the oral examination	

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													<p>is referenced from the DBC planning portal under the heading "Strategic Housing Market Assessment (SHMA) April 2010", though the heading within the executive summary document itself is still "Strategic Housing Market Assessment 2008 " and is prefaced with these significant caveats:</p> <p>"i. This study was undertaken in 2008/9. The reference point for the analysis was up to the end of March 2008 as this ensured that all data sources could be reconciled to the same baseline date. The modelling projections produced relate to the period April 2007 to March 2021 .</p> <p>ii. There have been significant changes since the start of this study, including the impacts of the recession on the housing market and, in 2009, the legal challenge to the East of England Plan. It was not possible to fully calibrate the results of this study to take full account of such factors given that many secondary data sources are yet to reflect these and other more recent changes.</p> <p>iv. It is not yet clear what impact the economic downturn may have on international migration but the number and nature of migrants from overseas is an important factor in determining the overall requirement for housing across the LCB (West). If net international migration falls, the overall housing requirement is</p>			

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													<p>also likely to reduce. "</p> <p>The last sentence, coupled with the current Government's stated policy of capping non-EU net inward migration, is a clear indication that government policy should have resulted in a reduction and not an increase in the target figure over the last two years, whereas in fact the lower growth options have been progressively withdrawn in the consultations that have taken place since 2009, as we summarise in our response to Section 1.4.</p> <p>The discrepancy in planning period (SHMA to 2021, Core Strategy to 2031) also detract from the soundness of the current 430 per annum figure.</p> <p>Average house occupancy is another key factor in arriving at housing targets. Since these targets take into account planning permissions already granted, the considerable number of house extensions that have taken place in Dacorum in recent years should also be allowed for. Most extensions result in extra bedrooms and sometimes extra bathrooms, and therefore facilitate higher occupancy levels. Extensions typically take up former garden space, and thereby deplete a recognised and important habitat resource for the promotion of biodiversity, so it is perfectly appropriate in Green Accounting terms for this to be offset by a reduction in the allocation of new greenfield sites for further</p>			



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													development.  No irrevocable planning decisions, in particular any resulting in loss of Green Belt, should result from over-provision for international migration or any other factor.			
488516	mr hugh siegle					Paragraph	14.16	14.16	Objecting	No	b) Effective		There should be a reference to Green Belt as land which will not be considered for new development	Final point to be amended to read " the desire to protect the countryside and the policy of preserving existing Green Belt boundaries"	No, I do not wish to participate at the oral examination	
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	14.17	14.17	Objecting	Yes	No	b) Effective	For the Core Strategy to be effective, the Council will also need to have regard to 'Development Management Policies set out in a Development Management Policies DPD' when considering major proposals not in the Plan.	As proposed above.	No, I do not wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 14.18	14.18	Supporting	Yes	Yes		Para 14.18 support premise that Hemel Hempstead will continue to be the focus for higher levels of growth.		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 14.18	14.18	Supporting	Yes	Yes		This comment relates to Paragraphs 14.18- 14.23 which address the proposed housing requirement and distribution.  Our client considers that the Pre-Submission Core Strategy identifies an appropriate level of housing for the Borough over the plan period.  In order to achieve this, Paragraph 14.19 states that previously developed land will be utilised wherever possible, but that this will not be enough in isolation to maintain a sufficient and steady		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing

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													supply of housing over the lifetime of the plan. Therefore, some greenfield development including appropriate extensions to Hemel Hempstead known as Local Allocations will be required.  This approach is supported as a sustainable, achievable and practical response to housing delivery, which will ensure that the housing requirement can be met.  It is considered vital that the level of housing identified for Hemel Hempstead is delivered in order to meet the needs of the population over the plan period.			(and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
223914	Mrs Nichola Mills					Paragraph	14.9	14.19	Objecting	No	No	a) Justified	No housing should be built on greenbelt. The other option for housing would have enabled all housing to have been built on brownfield sites. This option must be taken.  Plus building on the Greenbelt decreases biodiversity.	Select the other housing option using brownfield sites.	No, I do not wish to participate at the oral examination	
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	14.19	14.19	Objecting	Yes	No	b) Effective	The final sentence should include reference of local allocations being made through a Site Allocations DPD, and that they <u>may</u> require small-scale Green Belt boundary changes on an exceptional basis, rather than <u>will</u> do so.	The words 'following their inclusion in a Site Allocations DPD may' should be included after 'these local allocations'.	No, I do not wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 14.19	14.19	Objecting	Yes	No		"Some contribution from greenfield land is planned for within the urban areas . . .' as this will undermine measures to promote biodiversity and local character.		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
494310	Mr	Barratt Strategic	494284	Mr	Rapleys LLP	Paragraph	Paragraoh 14.19	14.19	Supporting	Yes	Yes		This comment relates to Paragraphs 14.18- 14.23 which address the		Yes, I wish to	Our client is a national house

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	Elliot Jones			Elliot Jones									<p>proposed housing requirement and distribution.</p> <p>Our client considers that the Pre-Submission Core Strategy identifies an appropriate level of housing for the Borough over the plan period.</p> <p>In order to achieve this, Paragraph 14.19 states that previously developed land will be utilised wherever possible, but that this will not be enough in isolation to maintain a sufficient and steady supply of housing over the lifetime of the plan. Therefore, some greenfield development including appropriate extensions to Hemel Hempstead known as Local Allocations will be required.</p> <p>This approach is supported as a sustainable, achievable and practical response to housing delivery, which will ensure that the housing requirement can be met.</p> <p>It is considered vital that the level of housing identified for Hemel Hempstead is delivered in order to meet the needs of the population over the plan period.</p>		participate at the oral examination	<p>builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
211062		Banner Homes Limited	618743	Mr Les West	Barton Willmore	Paragraph	14.20	14.20	Objecting	Yes	No	b) Effective	<p>Given the importance of Berkhamsted as the second largest settlement in the market town, it is considered that the proportional allocation of housing to Berkhamsted is not sufficient to meet local needs. Also even if the current pro-rata distribution Borough is maintained then with a higher overall number being justified for the should be a consequential uplift in housing numbers for Berkhamsted in Table 8.</p> <p>It is considered that the proposed target for Berkhamsted in Table 8 is</p>	<p>Increase the number of dwellings indicated in Table 8 for Berkhamsted.</p> <p>Please refer to Barton Willmore's accompanying report for further details.</p>	Yes, I wish to participate at the oral examination	In order to be able to provide further written and oral evidence to the Inspector.

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													not 'effective'.  Please refer to Barton Willmore's accompanying report for further details.			
488516	Mr Hugh Siegle					Paragraph	14.20	14.20	Objecting	No	a) Justified		The proposed growth in housing will place unacceptable pressures on existing infrastructure and utilities, particularly water supplies and risks changing the character of towns such as Berkhamsted and Tring. The inevitable windfall sites which are excluded from these figures will increase these pressures.  The projections for Berkhamsted include the use of Green Belt land which should be resisted and too high density at the Shootersway/ Durrants Lane site		No, I do not wish to participate at the oral examination	
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraph 14.20	14.20	Supporting	Yes	Yes		This comment relates to Paragraphs 14.18- 14.23 which address the proposed housing requirement and distribution.  Our client considers that the Pre-Submission Core Strategy identifies an appropriate level of housing for the Borough over the plan period.  In order to achieve this, Paragraph 14.19 states that previously developed land will be utilised wherever possible, but that this will not be enough in isolation to maintain a sufficient and steady supply of housing over the lifetime of the plan. Therefore, some greenfield development including appropriate extensions to Hemel Hempstead known as Local Allocations will be required.  This approach is supported as a sustainable, achievable and practical response to housing delivery, which will ensure that the		Yes, I wish to participate at the oral examination	Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.  Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.

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													housing requirement can be met.  It is considered vital that the level of housing identified for Hemel Hempstead is delivered in order to meet the needs of the population over the plan period.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)					Table 8	Table 8	Objecting	Yes	No	a) Justified	BRAG considers the number of houses allocated to Berkhamsted to be excessive to maintain population stability as stated as an aim in 8.9 Table 1. See also BRAG submission for paragraph 1.13 (a).	The entry for Berkhamsted in Table 8 should read 750.	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd		Table 8	Table 8	Objecting	No	No	a) Justified	It is unsound because it is not Justified or Effective.  Hemel Hempstead Page 106 - Table 8 / Page 167 - Para 20.6: Hemel Hempstead's role in the spatial strategy means its share of the increased housing target will increase in the light of the concentration of houses and jobs there.	Hemel Hempstead's role in the spatial strategy means its share of the increased housing target will increase in the light of the concentration of houses and jobs there and this increase in importance should be re emphasised.	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms of housing provision. Hemel Hempstead is to be the main provider of housing but this needs to be increased and the role of the town reinforced. Therefore the role of Hemel Hempstead needs to be emphasised and the merits of the site, and the relative merits of other boundary changes or allocated sites, will need to be examined orally.

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496443		Grand Union Investments	372732	Ms Jane Barnett	Savills		Table 8	Table 8	Objecting	Yes	No	a) Justified	<p>It is not sound as it is not Justified, Effective or Consistent with national policy.</p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are considered unsound for a number of significant reasons:</p> <p><b><u>(1) DBC's borough-wide Housing Target</u></b></p> <p>PPS3 states that Local Authorities should deliver "a sufficient quantity of housing taking into account need and demand and seeking to improve choice". The DCLG Practice Guide 3[1&amp;2] sets out the requirement for analysis of past and current housing market trends, including balance between supply and demand in different housing sectors in addition to consideration of future household estimations.</p> <p>This is echoed in the Government's NPPF which indicates the importance a presumption in favour of new development which meets housing demand and results in economic growth for an area. It places emphasis on the importance for Authorities to identify a scale and mix of housing that the local population is likely to require over the plan period which "meets household and population projections, taking account of migration and demographic change."</p> <p>Further, Annex C of PPS3 adds that Strategic Housing Market Assessments (SHMAs) should "determine how the distribution of need and demand varies across the plan area", consider "demographic</p>	<p>For the reasons set out above, the following changes are considered necessary in order to make the Core Strategy is sound.</p> <p>The number of dwellings indicated in each Local Objective for Berkhamsted should be 2,871.</p>	Yes, I wish to participate at the oral examination	It is necessary as the above relates to changes to the Core Strategy Plan in relation to future development growth across the borough.

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													<p>trends, and identify the accommodation requirements of specific groups". In essence, future housing development should meet forecasted levels of housing growth of a borough/ district and focus on those areas which have existing and expected market demand i.e. that new homes are built at the right market locations within a local area. PPS3 also indicates that plans should provide certainty in identifying suitable locations for new housing development as part of the wider spatial vision for the local area.</p> <p>It is therefore essential that DBC's housing target for the plan period is justified by a robust evidence base that takes into consideration existing and projected population and household growth.</p> <p>The Pre-Submission Core Strategy consultation document recognises this requirement. It states that the borough's towns cannot sustain themselves unless there is investment and they are allowed to adapt and grow[3], and meet their local housing needs[4]. The consultation document also acknowledges that the choice of housing target has considered "the amount needed to meet forecast household growth in the borough"[5].</p> <p>However, draft policy CS17 implies a housing target of 10,750 additional dwellings provided between 2006-2031 based on annual development rates. Confusingly, DBC identifies in draft Table 8 a target for providing 11,320 additional dwellings in the plan period which includes windfall</p>			

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													<p>allowance. This is inconsistent with the policy target and PPS3.</p> <p>GUI have submitted a Housing Demand and Socio-economic Assessment, November 2011 which assesses in detail the actual housing demand for the borough and Berkhamsted. The calculation is based on the latest household and population projections. It concludes that 13,246 additional dwellings are required within the CS Plan Period to meet the actual housing demand and needs of the borough.</p> <p>The CS's supporting Sustainability Appraisal (September 2011) states that the delivery of 10,750 dwellings to 2031 would "have adverse effects on some environmental objectives" but would "provide a balance between housing provision and planned new job creation". It adds that a higher</p> <p>housing target of 13,450 (based on 2008 ONS projections) would have "adverse effects on many environmental objectives" and "the imbalance between new homes and jobs could create issues relating to an under supply of jobs". It does however acknowledge that this higher growth level</p> <p>would "better meet natural population growth needs", result in "greater provision of affordable housing" and "help maintain viability of existing services whilst also encouraging the provision of new facilities" (Page E-30, Appendix E: Policy Assessment).</p> <p>The draft policy target figure of 10,750 additional dwellings to be provided to 2031 is therefore significantly under-estimated (by</p>			



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													<p>2,450 additional dwellings borough-wide). No definitive evidence has been put forward to justify this reduction, without which the overall housing target is considered to be fundamentally flawed.</p> <p>On this basis, draft policy CS17 should therefore propose an annual target of some 530 dwellings per annum in order to meet forecasted natural household growth in the borough (13,200 divided by 25 years).</p> <p>The exclusion of windfall provision for the first ten years in the calculation of housing supply policy CS17 is generally supported (in accordance with national policy). However, the reasoning for including this windfall provision in draft Table 8 is ambiguous. For the above reason, the additional 13,246 unit requirement (to 2031) should replace DBC's additional housing requirement figure of 11,320 currently identified.</p> <p><b><u>(2) DBC's Housing Target and Land Allocation at Berkhamsted</u></b></p> <p>The proposed housing target for Berkhamsted in draft Table 8 and the Strategic Sites and Local Allocations identified in draft Table 9 are not considered to be based on any robust evidence base. DBC's housing evidence does not (1) properly examine locally generated housing needs and demands based on natural population (and household) growth at Berkhamsted and (2) sufficiently assess the identified sites' appropriateness in accordance with PPS3 (PPG2) and other national</p>			

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													<p>planning-related criteria.</p> <p>In particular, Berkhamsted, as an important market town, has not been given the opportunity to enhance its function and vitality and its overall contribution to the borough's socio-economic activity by being identified for any form of new strategic development.</p> <p><u>a) Actual Housing Demand and Needs at Berkhamsted</u></p> <p>There is no robust evidence from the Authority to indicate how a target of providing an additional 1,180 dwellings for Berkhamsted (draft Table 8) has been derived.</p> <p>The detailed analysis undertaken in the appended Housing Demand &amp; Socio-Economic Assessment, November 2011, which forms part of GUI's Planning Submission based on the most recent data available, shows that the demography of Berkhamsted is more dynamic than that generally seen in Dacorum.</p> <p>It outlines that this is unlikely to have been taken into account in the various projections produced so far by Dacorum - and as a result there has been a substantial underestimation of the amount of future new housing likely to be required at Berkhamsted.</p> <p>More specifically, GUI's Housing Demand &amp; Socio-Economic Assessment identifies the need for Berkhamsted and Northchurch to provide 2,871 additional dwellings over the CS period to meet forecast levels of natural population and household growth. This assumption is based on the latest</p>			

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													<p>ONS statistical data (2008) which should be applied. In fact DBC has actually acknowledged that this data should be considered but that the borough is instead subject to economic growth and environmental constraints. Meeting future housing demand is the foremost consideration (in national policy) whilst supporting new development at the most sustainable locations. New homes create economic regeneration and in terms of environmental constraints, most of the DBC's settlements are contained by Green Belt and it should be accepted that the housing need is an exceptional position to consider sustainable land release where the needs and demands are across the borough.</p> <p>This figure should be reflected in draft Table 8 of the Pre-Submission Core Strategy.</p> <p>DBC's housing trajectory identifies capacity for 853 dwellings on defined sites with a further 60 dwellings on Local Allocations. An additional 277 dwellings are estimated on undefined sites. This provides for a total of 1,190 additional new homes to be planned for by DBC's calculation, however, their Table 8 defines a 1,180 requirement. Again, this highlights discrepancies in DBC's assessment of housing demand and need. When set against the actual housing demand requirements set out in GUI's Housing Demand &amp; Socio-Economic Assessment, there is a deficit of 1,691 dwellings (when set against the DBC's planned 1,180 figure) to meet local demand at Berkhamsted over the plan period.</p> <p>GUI's Housing Demand &amp; Socio-</p>			

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													<p>Economic Assessment demonstrates that only 41.1% of local housing demand would be met through the current allocation in the Pre-Submission Core Strategy. Not only will this result in a net outward migration of people from Berkhamsted but it will also result</p> <p>in the already high house prices being exacerbated as demand rises. This in turn will result in an uneven impact across the population with first time buyers and all local income groups being largely excluded from the town.</p> <p>Restricting the expansion of Berkhamsted, as the second largest settlement (in terms of population size and critical mass of services and facilities) will result in Dacorum not fully realising its future potential in terms of housing and economic growth.</p> <p>There is no doubt that the objective of meeting local housing demand must be balanced against competing objectives in the Core Strategy. These objectives include limiting the impact on the Green Belt and landscape designations, both of which constrain much of Berkhamsted's boundary.</p> <p>Other assessments on these issues and other environmental constraints that accompany this submission show that the land south of Berkhamsted can be released from the Green Belt without a significant impact on the integrity of the designation or the environment. In the fact, the proposals</p> <p>aim to achieve a number of CS vision objectives and commonplace strategies and objectives to include those more specifically concerning</p>			

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													<p>Berkhamsted.</p> <p>Whilst the concept is currently at a very initial stage, it is anticipated that it will have a development capacity target of some 800 units over the early part of the Core Strategy period. This will increase supply to 1,990 dwellings. Whilst this does not meet the total local need of 2,871 dwellings, it does substantially improve the situation from 41.1% provision to 69.3%.</p> <p>The remaining need for 881 dwellings is unlikely to be met within the town without a review of employment land or expansion onto significantly more sensitive greenfield land, neither of which are recommended. Instead this demand will need to be met elsewhere in the borough, most likely Hemel Hempstead. It is through this mechanism that focusing development on Hemel Hempstead can be undertaken sustainably.</p> <p>In conclusion, DBC has fundamentally underestimated the future housing needs and demands for the town of Berkhamsted. This makes the CS Plan unsound without amendment to draft Table 8 (as recommended below).</p> <p><u>b) Land to South of Berkhamsted is considered the most sustainable and suitable location at the edge of the town to assist in accommodating some of the town's future housing demands and needs.</u></p> <p>Berkhamsted has a tightly defined settlement boundary and a relatively dense urban form which limits the opportunity for new residential development within the town. For example, Dacorum's Strategic</p>			

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													<p>Housing Land Availability Assessment (SHLAA, October 2008) identifies that, of the 109 identified urban housing sites within the existing housing settlement boundary of Berkhamsted, only 28 sites were deemed suitable by the Council which gives a general impression of the limited urban potential.</p> <p>Notwithstanding the town's constrained urban potential, Berkhamsted could have the ability to accommodate significant future housing growth to assist the borough in meeting its future housing requirements whilst enhancing the town's status (in a complementary role to Hemel Hempstead) and investment potential.</p> <p>On this basis, the Council will need to consider the release of Green Belt and greenfield land around Berkhamsted to accommodate housing growth in the future.</p> <p><i>Alternative Growth Locations</i></p> <p>Green Belt land to the north, west and east of Berkhamsted is constrained by AONB and other environmental designations which potentially restrict these areas in accommodating new strategic development around the town.</p> <p>GUI's Sustainability Appraisal Review (prepared by Savills, dated November 2011) which also supports GUI's Planning Submission shows that this site performs considerably better than other potential directions of growth to meet the housing demands of the town.</p>			

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													<p>The review undertakes a critique of the alternative Green Belt, greenfield locations around the town as part of a sustainability matrix assessment (using DBC's own SA objectives). It concludes that through this analysis, the southern location is the most sustainable location for new development in order to meet the town's future housing demands and needs.</p> <p>GUI's SA review also considers other much smaller sites identified by landowners and the Council as Strategic Sites and Local Allocations in terms of the sustainability. An assessment of these sites alongside a suggested ranking is found at Appendix 1 of the SA Review Document.</p> <p>Land South of Berkhamsted also performs well when benchmarked against the two larger proposed greenfield "Local Allocations" in Hemel Hempstead. It is acknowledged that Hemel Hempstead is the main focus for future development growth although some of the strategic sites and "Local Allocations" at the town could be questioned in terms of their overall development capacities.</p> <p>However, the suitability of development proposals at Land South of Berkhamsted compared against sites at Hemel Hempstead indicates that the site could have a positive role in complementing future development growth at Hemel Hempstead and could contribute not only to the town's local housing needs but also to the wider parts of the borough.</p> <p>Consolidating future development at Land South of Berkhamsted should</p>			

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													<p>also avoid the need to release Green Belt, greenfield sites at smaller, more constrained settlements to include smaller market towns such as Tring and the other villages. These smaller settlements are unlikely to be able to sustain strategic development growth by the nature of their more limited existing services, facilities and retail provision. This strategic development approach would also avoid town cramming more generally within the town.</p> <p><i>Land South of Berkhamsted</i></p> <p>DBC's Alternative Site Assessment (2010) correctly recognises in relation to Land South of Berkhamsted that "Berkhamsted continues to command high house prices locally and collectively the land should prove attractive to the market" and that "it is of a scale that should be able to meet demands for associated infrastructure and affordable housing". It further adds that "given the scale of the land there is significant scope to secure other non residential uses, particularly open/leisure space. While at a distance from the town centre and employment areas, it is of a scale that could contribute towards improved public transport (community bus hub)" and "there are no fundamental constraints to prevent the sites coming forward if allocated for housing."</p> <p>However, the Officers' Conclusion states that "the scale of proposal is clearly contrary to national Green Belt policies and beyond that needed to meet the predicted housing growth of Berkhamsted to 2031. It would have a major impact on the character and setting of the</p>			



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													<p>town, and lead to</p> <p>pressure to develop open countryside southwards towards the A41. While the site has the potential to deliver new community facilities, improve public transport, and contribute towards meeting deficits in open/leisure space, it would also put significant pressure on existing infrastructure such as roads and schooling. Smaller parcels in theory could be considered, but these also prove problematic in respect of their poor relationship to existing housing, proximity to the A41, local impact on open countryside, and poor direct access on to local roads. These sites proved very unpopular with local residents during the consultation on the Site Allocations DPD during late 2008."</p> <p>As mentioned above and as referred to in GUI's Housing Demand &amp; Socio-Economic Assessment (November 2011) which supports these planning representations, the Officers' Conclusion is misinformed in terms of the development being "beyond that needed to meet predicted housing</p> <p>growth at Berkhamsted to 2031."</p> <p>There is a clear need for strategic new development at the town. It has been demonstrated that Land South of Berkhamsted is the most sustainable and suitable development location. To the south of the town there is existing education and recreational development and DBC has identified Ashlyns School and the BFI as Major Developed Sites (MDS) in the Green Belt - all of which starts to set a precedent for further new development up to the</p>			

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													<p>built boundary of the town, the A41.</p> <p>A Concept Plan has been prepared in connection with the Development Proposals and various technical assessments have been undertaken to underpin and support this Concept. The Concept Plan and the technical assessments are found at GUI's submitted Planning Document forming part of their evidence base. This document also appends a Housing and Infrastructure Delivery Trajectory which demonstrates the delivery of the new development in a viable and sustainable way taking into account associated infrastructure costs amongst other factors.</p> <p>The development proposals at Land South of Berkhamsted are associated with a proposed local package of socio-economic and environmental benefits to the town (and the wider part of the borough).</p> <p><i>Infrastructure Benefits</i></p> <p>An extensive amount of technical work has already been undertaken to support the principle of new development at Land at South Berkhamsted and which has been shared with DBC, Hertfordshire County Council (HCC) and other key stakeholders. A Concept Plan forms the development</p> <p>proposals which has importantly been underpinned by various technical assessments to include transportation, environmental and landscape, ecology, heritage and visual impact, and a housing and infrastructure delivery trajectory (HIDT) - all of which form part of GUI's Planning Document in response to DBC's Pre-Submission</p>			

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													<p>CS.</p> <p>A comprehensive community engagement programme has also ensured that the Concept Plan is informed by, and meets the needs of, local residents and their families, stakeholders and interest groups. This community consultation and engagement process was managed by GUI and a report on the outcomes and how the Concept Plan has responded to concerns is outlined in the SCI.</p> <p>The new development results in a package of significant socio-economic and environmental improvements including: the provision of a link road and bus loop to serve the existing town and new residents; a local village centre with supporting community / leisure facilities; open green space; allotments and community orchards; enhanced primary education provision; the creation of local employment opportunities; the provision of wider rural links; and overall town centre regeneration and improvement to local facilities as a result of increased spending power.</p> <p>This has resulted in a Concept Plan which represents a bespoke vision for a new neighbourhood to the south of the town, building on the unique opportunities inherent in these development sites. A holistic design approach has ensured transport, landscape, sustainability and social infrastructure are integrated in a way that continues the town's unique market town character and creates a neighbourhood with a real sense of place.</p>			

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													<p>The resulting 770 unit scheme represents a good planning, design and sustainability response to the site. GUI asks DBC to consider an allocation for some 800 units as a development capacity target for the site and subject to a detailed masterplan at the later stages of the development process.</p> <p>The Planning Document and appending technical assessments which form part of GUI's submission examines these benefits in detail.</p> <p><i>The Local Issues</i></p> <p>A consultation event took place (in late 2008) to explore Berkhamsted's key issues. The Place Workshop for Berkhamsted took place in September 2008. Attendees included Councillors, local businesses and residents. The key messages from the discussions at the Workshop were outlined in the Council's "Berkhamsted Place Workshop Report" (October 2008) and were considered positive in relation to potential housing development at parts of the land to the south of Berkhamsted. More importantly, the majority of the land to the south of Berkhamsted was outlined, at the time, as being "suitable" for housing (as per Figure 1 of the workshop report).</p> <p>In particular, stakeholder discussion at this workshop included consideration towards outward expansion of Berkhamsted stating that "the A41 bypass forms a new 'natural' southern boundary for the town" and more specifically the "area between Kingshill Way/</p>			

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													<p>Shootersway therefore presents itself as an easy place for development, due to fields, copses and general areas being 'trapped' by the bypass and other boundaries." More general aspirations in relation to the future of Berkhamsted were discussed at the workshop which included the need for improvement of social and transport infrastructure in and around Berkhamsted and the provision of more affordable housing. Land to the south of Berkhamsted offers a solution to meet these above local objectives.</p> <p>GUI undertook a community engagement process during this year (2011) and the Concept Plan aimed to address many of the local community's concerns. Details are found at the Planning Document (at Appendix 8).</p> <p>It is acknowledged that the local community are not supporting the Proposals. However, DBC also needs to decide, beyond the political pressures to be conservative in growth, that future housing needs and demands for the town will only benefit the community's future generation's housing needs and demands if new development is allowed to take place. This will mean that the younger generations of the existing community will be able to afford to stay in their home town and in turn retain and enhance the town's function and vitality - one of the key strategic and local objectives for the town within the CS Plan.</p> <p><i>Concluding Commentary</i></p> <p>All of the above evidence illustrates</p>			

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													<p>that Land South of Berkhamsted is considered the most logical and sustainable development option at the town in terms of PPS2, PPS3 and other national planning-related criteria and guidance to include the NPPF. It will also ensure the delivery of a</p> <p>package of local social and transportation infrastructure benefits which are intended to significantly improve the long term functioning and vitality of the town. These aspects are considered to respond to the comments identified in the Officers' Conclusion in DBC's Alternative Site Assessment (2010) as well as positively addressing the "Strategic Objectives" and "Common Local Objectives" identified in the CS Plan.</p> <p><b>Conclusions on soundness of draft Policy CS17, draft Table 8 and draft Table 9</b></p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are not justified on the basis that the housing targets on which they are based are not supported by a robust and credible evidence base nor are they effective as their approach would not deliver the quantum or distribution of housing needed in the Borough.</p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are not consistent with national policy because they are based on housing targets which do not sufficiently meet local housing needs and natural household and population growth projections.</p> <p>By identifying the actual projected level of housing growth required borough wide and at Berkhamsted, and further by identifying Land</p>			

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													<p>South of Berkhamsted as a Housing Allocation for development purposes, the strategic and local objectives of the CS Plan will be achieved whilst also meeting key objectives contained in PPS1, PPG2, PPS3 and the NPPF.</p> <p><b>Footnotes:</b></p> <p>1. DCLG. May 2007. Housing Market Information Advice Note.</p> <p>2. DCLG. August 2007. Strategic Housing Market Assessments Practical Guide.</p> <p>3. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 8.7.</p> <p>4. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 1.13.</p> <p>5. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 14.16.</p>			
498429	Steve Baker	CPRE - The Hertfordshire Society					14.20	Table 8	Objecting	Yes	No	a) Justified	Table 8 should be amended to remove the Green Belt site local allocations which CPRE Hertfordshire objects to at Hemel Hempstead, Berkhamsted, Tring and Bovingdon. These sites are not required to meet the dwelling target of 9,835 that was consulted on as Option 1 in the draft Core Strategy and is supported by CPRE Hertfordshire (see objection to paragraph 14.9), and the need to develop them in the short to medium term has not been demonstrated to be necessary in order to support the Housing Target in the Core Strategy in the context of reasonable alternatives.	Dwelling numbers to be revised.	Yes, I wish to participate at the oral examination	To ensure that the Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.
503032	W	W Lamb Ltd	210965	Mr	Boyer Planning		Table 8	Table 8	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent	Shendish should be added to Figure 19 as shown on Appendix	Yes, I wish to	Significant issue relating to housing

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	Lamb			David Lander								d	with national policy.  Housing provision is inadequate to meet identified requirements in the Borough based on the range of projections considered in accordance with national policy and vision and objectives of the Core Strategy- see Section Three of Statement and separate representation regarding Policy CS17.	5 of the Statement.  Increase <b>Hemel Hempstead</b> dwellings provision to <b>11,070</b> and overall housing provision to <b>13,500</b> .	participate at the oral examination	provision spatial strategy, Hemel Hempstead Place Strategy.
620224	Mr Stephen Harris	Emery Planning Partnership					Table 8	Table 8	Objecting	No	No	c) Consistent with national policy	This section has assessed a number of scenarios to assess the housing requirement for Dacorum based upon the various source documents or data. For ease of reference these are set out in Table 2.  Table 2 demonstrates that the housing requirement being pursued by the Council in policy CS17 in this pre-submission Core Strategy is substantially below the requirements in the evidence base (SHMA) and the latest household projections. The only conclusion is that the Council has artificially reduced the potential requirement contrary to the evidence base. Therefore the Core Strategy is not sound and should be revised accordingly.  We consider the requirement should be at least 14,000 as this accords with:  SHMA (April 2010); The affordable housing need; and, The 2008 based Household projections (November 2010).		Yes, I wish to participate at the oral examination	Please see attached



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													<p>Having assessed the overall housing requirement we assess the needs of Tring.</p> <p><b>Tring</b></p> <p>The Core Strategy accepts that development and change will be required within Tring to maintain its existing vitality. Paragraph 22.3 of the Spatial Strategy for Tring states that 480 new homes will be provided in Tring between 2006 and 2031.</p> <p>This figure conflicts directly with the requirements in the previous Core Strategy (December 2009) which set out a requirement a minimum requirement of 465 for Tring which would maintain the current level of population and a maximum of about 939 dwellings would be sufficient to accommodate a natural growth for the period 2006-2031.</p> <p>The evidence since that date, in the SHMA and the 2008 based household projections demonstrate an increase in households and housing need in Dacorum. However in the pre-submission Core Strategy, the requirement is only 480 dwellings. This is another direct conflict with the evidence base and the Core Strategy requirement being artificially reduced and not meeting the actual housing need.</p> <p>Paragraph 22.3 also states that 150 of the new dwellings would be delivered by a local allocation on the western edge of the town. However we question the validity of delivering the remaining 330 dwellings within the urban area. The SHLAA states that Tring could</p> <p>accommodate 244 dwellings. This is</p>			

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													<p>calculated on the sites assessed in the SHLAA Volume 3. However, the delivery of many of these sites must be questioned, as many are currently in employment use (TW8, TW10), longstanding allocations (TW4), would result in the loss of trees and overlooking (TW14, TW19) or are high density scheme that has not been delivered and in the current market unlikely (TE8). Therefore the urban capacity envisaged in a compact settlement such as Tring cannot be substantiated and should be reviewed accordingly.</p> <p>Secondly, we consider that the previous requirement of 939 dwellings to accommodate natural growth is realistic and should therefore be applied as a minimum. We recognise that this will require further greenfield sites to be developed, however there are clearly sustainable options to deliver that requirement, including Waterside Way, and therefore the town must expand as required over the plan period.</p> <p>Now that the evidence base for the LDF has been published, it must be adhered to. In the case of housing need, the Core Strategy has not adhered to the evidence base and cannot be considered sound.</p> <p>We therefore consider that additional sites must be identified adjacent to Tring to meet the town's housing needs. This would include Waterside Way.</p>			
494131	Mr Michael Emmett	CALA Homes					Table 8	Table 8	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>The distribution of housing across</p>	Table 8 - Increase the number of dwellings to be distributed to Tring to at least 630.	Yes, I wish to participate at the oral examination	CALA Homes has a controlling interest in the Icknield Way Tring Local Allocation and as

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													<p>the Borough is is set out in Table 8, while Table 9 identifies those new sites, over and above existing commitments, expected to contribute to housing supply.</p> <p>Hemel Hempstead is proposed to accommodate around 78% (8,800 out of a total of 11,320) of the Borough's new housing. This compares with its current population which is in the order of 61% of that of the Borough's. It has already been accepted that it is entirely appropriate concentrate new housing in Hemel, however, due to a combination of this and a low Borough total, other settlements are allocated insufficient housing, resulting in their local needs being unmet.</p> <p>For example, Tring is the third largest settlement in the Borough, with around 8% of Dacorum's total population, yet it is planned to cater for only 4% of future growth.</p> <p>While the Council's strategy of focussing new development on Hemel is fully understood , and could be supported if it was not to adversely impact on other settlements, particularly the more sustainable market towns, the fact that the total level of provision is so low means that such an approach inevitably deprives Tring of the opportunity to meet its local housing needs.</p> <p>The Council's own analysis (Population: Background Note for the Core Strategy April 2009) bears this point out. Under a nil net migration scenario, this points to a need for between 841 and 938 dwellings over the plan period (depending on the data and</p>			such has an important role to play in delivering a key element of the Core Strategy.

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												<p>methodology used). The Core Strategy proposes just 430, barely half that required.</p> <p>Earlier this year CALA commissioned Barton Willmore to critique this analysis; their report is attached as Appendix 3. While this concludes that a higher still number of homes is required, the more important message in their work is the adverse impact of under-provision on the local community; the population will age as young people are priced out of the local housing market. It will certainly not result in the socially inclusive community to which the Core Strategy aspires.</p> <p>Based on comments made in respect of Proposal LA5, CALA seeks an increase in the capacity of the Icknield Way allocation in Table 9 to 300 homes, while in the light of the observations made above, it is considered that the distribution to Tring in Table 8 should be increased substantially. While no specific alternative figure is proposed, it is suggested that this increase is at least 150 dwellings (to 630) to equate to the increase sought to the Icknield Way site capacity.</p>				
4948 47		Trustees of Drayton Beauchamp Parochial Charities	6267 80		Cole Flatt & Partners		Table 8	Table 8	Objecting	Yes	No	c) Consistent with national policy	<p>Distribution of housing</p> <p>This is set out in Table 8.</p> <p>Hemel Hempstead is proposed to accommodate around 78% (8,800 out of a total of 11,320) of the Borough's new housing. This compares with its current population which is in the order of 61% of that of the Borough's. It is accepted that it is entirely appropriate to concentrate new housing in Hemel,</p>	Refer to response to question 4 above.	No, I do not wish to participate at the oral examination	

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													<p>however, due to a combination of this and a low Borough total, other settlements are allocated insufficient housing, resulting in their local needs being unmet.</p> <p>For example, Tring is the third largest settlement in the Borough with around 8% of Dacorum's total population, yet it is planned to cater for only 4% future growth.</p> <p>While we fully understand the Council's strategy of focussing new development on Hemel and would support this if it was not to adversely impact on other settlements, particularly the more sustainable market towns, the fact that the total level of provision is so low means that such an approach inevitably deprives Tring of the opportunity to meet its local housing needs.</p> <p>The Council's own analysis (Population:Background Note for the Core Strategy April 2009) bears this point out. Under a nil net migration scenario, this points to a need for between 841 and 938 dwellings over the plan period (depending on the data and methodology used). The CS proposes just 430, barely half required.</p>			
515465	Mr Alan Kemp	Berkhamsted Town Council					Table 8	Table 8	Objecting	Yes	No	a) Justified	Berkhamsted Town Council does not support this level of growth. We contend that the proposed development for Berkhamsted will <b>exceed</b> locally generated needs. We would estimate that were Berkhamsted to be treated in the same way as other market towns we would have a housing need of around 750 dwellings. The assumptions underlying the growth figure of 1180 are critical. From the paper Population: Background Note for the Core Strategy, dated April		Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.

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													2009, we have the following figures for Berkhamsted			
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners		Table 8	Table 8	Objecting	Yes	No	c) Consistent with national policy	<p>Distribution of housing</p> <p>This is set out in Table 8.</p> <p>Hemel Hempstead is proposed to accommodate around 78% (8,800 out of a total of 11,320) of the Borough's new housing. This compares with its current population which is in the order of 61% of that of the Borough's. It is accepted that it is entirely appropriate to concentrate new housing in Hemel, however, due to a combination of this and a low Borough total, other settlements are allocated insufficient housing, resulting in their local needs being unmet.</p> <p>For example, Tring is the third largest settlement in the Borough with around 8% of Dacorum's total population, yet it is planned to cater for only 4% future growth.</p> <p>While we fully understand the Council's strategy of focussing new development on Hemel and would support this if it was not to adversely impact on other settlements, particularly the more sustainable market towns, the fact that the total level of provision is so low means that such an approach inevitably deprives Tring of the opportunity to meet its local housing needs.</p> <p>The Council's own analysis (Population:Background Note for the Core Strategy April 2009) bears this point out. Under a nil net migration scenario, this points to a need for between 841 and 938 dwellings over the plan period (depending on the data and methodology used). The CS</p>	Refer to response to question 4 above.	No, I do not wish to participate at the oral examination	

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													proposes just 430, barely half required.			
211062		Banner Homes Limited	618743	Mr Les West	Barton Willmore	Paragraph	14.21	14.21	Objecting	Yes	No	b) Effective	<p>The level of housing provision to be delivered through site allocations for Berkhamsted is noticeably less than for other smaller settlements, such as Tring and Bovington. Banner Homes considers that there should be more allocated sites in a settlement the size and importance of Berkhamsted rather than reliance on sites in the Council's SHLAA for which there is still a considerable amount of uncertainty.</p> <p>Additional site allocations in Berkhamsted should be included in the draft Core Strategy such as the site at Lockfields. This should also be reflected in Section 21 the Berkhamsted Place Strategy.</p> <p>It is considered that the proposed site allocations for Berkhamsted in Table 9 and the consequent provision in the Berkhamsted Place Strategy are not 'effective'.</p> <p>Please refer to Barton Willmore's accompanying report for further details.</p>	<p>An increase in the number of dwellings that will be delivered in Berkhamsted through site allocations.</p> <p>Please refer to Barton Willmore's accompanying report for further details</p>	Yes, I wish to participate at the oral examination	In order to be able to provide further written and oral evidence to the Inspector.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 14.21	14.21	Supporting	Yes	Yes		<p>This comment relates to Paragraphs 14.18- 14.23 which address the proposed housing requirement and distribution.</p> <p>Our client considers that the Pre-Submission Core Strategy identifies an appropriate level of housing for the Borough over the plan period.</p> <p>In order to achieve this, Paragraph 14.19 states that previously developed land will be utilised wherever possible, but that this will</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input</p>

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													<p>not be enough in isolation to maintain a sufficient and steady supply of housing over the lifetime of the plan. Therefore, some greenfield development including appropriate extensions to Hemel Hempstead known as Local Allocations will be required.</p> <p>This approach is supported as a sustainable, achievable and practical response to housing delivery, which will ensure that the housing requirement can be met.</p> <p>It is considered vital that the level of housing identified for Hemel Hempstead is delivered in order to meet the needs of the population over the plan period.</p>			into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)					Table 9	Table 9	Objecting	Yes	No	a) Justified	BRAG submits that the housing figures proposed for Berkhamsted are excessive to sustain population stability (see BRAG submission 1.13 (a) and 8.9 Table 1). DBC's own figures suggest 750 dwellings is correct for Berkhamsted and as such Hanburys should be removed and the proposed housing density at Durrants Lane / Shootersway strategic site should be adjusted to be sympathetic to surrounding housing densities.	Remove Hanburys from the table completely and adjust housing numbers for Durrants Lane / Shootersway strategic site to be sympathetic to surrounding housing densities.	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will affect their environment and quality of life.
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd		Table 9	Table 9	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective or consistent with national policy.</p> <p>Pages 177/178 - Table 9 Hemel Hempstead Local Allocations (also key Diagram) : Nash Mills should be added to Table 9 on pages 177-178, the list of Local Allocations to provide for additional dwellings. This is especially so if the strategic allocations on those pages are amended or reduced as Nash Mills would be an ideal replacement.</p>			



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													Para 14.18 refers to the sequential approach in Policy CS2 where much of new development will come from within defined settlements. We object to the fact that there are only two relatively small sites identified as strategic sites. (at Berkhamstead and Markyate) providing a total of 270 dwellings. The Pre submission Core Strategy should identify further strategic and local allocation sites around the settlement of Hemel Hempstead to support the delivery of much needed housing.			
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd		Table 9	Table 9	Objecting	No		a) Justified	It is unsound because it is not Justified, Effective or Consistent with national policy.  Pages 177/178 - Table 9 Hemel Hempstead Local Allocations (also key Diagram) : Nash Mills should be added to Table 9 on pages 177-178, the list of Local Allocations to provide for additional dwellings. This is especially so if the strategic allocations on those pages are amended or reduced, as Nash Mills would be an ideal replacement.	Add the Nash Mills site to Table 9 on pages 177-178, the list of Local Allocations to provide for additional dwellings. This is especially so if the strategic allocations on those pages are amended or reduced, as Nash Mills would be an ideal replacement.	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms of housing provision which is fundamental to the Plan as a whole. Also the merits of the site and the relative merits of other boundary changes or allocated sites will need to be examined orally.
223914	Mrs Nichola Mills						Table 9	Table 9	Objecting	No	No	a) Justified	Upto 900 houses in West Hemel Hempstead is over developing one part of the borough. Upto 900 houses is too many for any part of the borough. Development needs to be spread out more across the whole borough.  Plus, no housing should be built on greenbelt. The other option for	The other option for housing would have enabled all housing to have been built on brownfield sites. This option must be taken.	No, I do not wish to participate at the oral examination	

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													housing would have enabled all housing to have been built on brownfield sites. This option must be taken.			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills		Table 9	Table 9	Objecting	Yes	No	a) Justified	<p>It is not sound as it is not Justified, Effective or Consistent with national policy.</p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are considered unsound for a number of significant reasons:</p> <p><b><u>(1) DBC's borough-wide Housing Target</u></b></p> <p>PPS3 states that Local Authorities should deliver "a sufficient quantity of housing taking into account need and demand and seeking to improve choice". The DCLG Practice Guide 3[1&amp;2] sets out the requirement for analysis of past and current housing market trends, including balance between supply and demand in different housing sectors in addition to consideration of future household estimations.</p> <p>This is echoed in the Government's NPPF which indicates the importance a presumption in favour of new development which meets housing demand and results in economic growth for an area. It places emphasis on the importance for Authorities to identify a scale and mix of housing that the local</p>	<p>For the reasons set out above, the following changes are considered necessary in order to make the Core Strategy is sound.</p> <p>Included Land South of Berkhamsted with a development capacity target of some 800 units.</p> <p>New development at Land South of Berkhamsted will help support the rejuvenation of the town through increasing its catchment population and could remove traffic from the centre leading to an improved environment. New development south of the town could be accessed from a distributor road to connect satisfactorily into the strategic transport network to both the west and east of the town.</p> <p>New development will need to be phased in line with the build rates to the south of the town, to ensure sufficient market demand is available. Furthermore, it is necessary to improve links by non-car transport modes to the town centre (including the possibility of a bus service) to both support the vitality and viability of the centre and reduce overall</p>	Yes, I wish to participate at the oral examination	It is necessary as the above relates to changes to the Core Strategy Plan in relation to future development growth across the borough.

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													<p>population is likely to require over the plan period which "meets household and population projections, taking account of migration and demographic change."</p> <p>Further, Annex C of PPS3 adds that Strategic Housing Market Assessments (SHMAs) should "determine how the distribution of need and demand varies across the plan area", consider "demographic trends, and identify the accommodation requirements of specific groups". In essence, future housing development should meet forecasted levels of housing growth of a borough/ district and focus on those areas which have existing and expected market demand i.e. that new homes are built at the right market locations within a local area. PPS3 also indicates that plans should provide certainty in identifying suitable locations for new housing development as part of the wider spatial vision for the local area.</p> <p>It is therefore essential that DBC's housing target for the plan period is justified by a robust evidence base that takes into consideration existing and projected population and household growth.</p> <p>The Pre-Submission Core Strategy consultation document recognises this requirement. It states that the borough's towns cannot sustain themselves unless there is investment and they are allowed to adapt and grow[3], and meet their local housing needs[4]. The consultation document also acknowledges that the choice of housing target has considered "the amount needed to meet forecast</p>	<p>private car trips.</p> <p>Local employment provision is also provided to meet local employment needs as part of the development proposals.</p> <p>In order to ensure the sustainability of new development at Land South of Berkhamsted, it will be necessary to ensure adequate provision of facilities including small scale retail and leisure facilities within walking and cycle distance of residents. This would be of a quality and scale of a local neighbourhood centre, or the provision of limited facilities within the site. It is important to ensure safe pedestrian, cycle and mobility aid access is provided to the local facilities as well Berkhamsted town centre.</p> <p>Within the development area, it is likely that a 2-form entry primary school will be required. Further guidance is set out in the Concept Plan (at Appendix 1) which could be amplified in a detailed development framework or brief to guide later planning applications (incorporating a detailed masterplan).</p> <p>There will be a need to maintain and enhance existing wildlife corridors connecting new development, the town and existing parkland and habitat areas south of the A41. These development principles reflect the Core Strategy's "Challenges" and "Strategic Objectives" and "The Vision" and</p>		

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													<p>household growth in the borough"[5].</p> <p>However, draft policy CS17 implies a housing target of 10,750 additional dwellings provided between 2006-2031 based on annual development rates. Confusingly, DBC identifies in draft Table 8 a target for providing 11,320 additional dwellings in the plan period which includes windfall allowance. This is inconsistent with the policy target and PPS3.</p> <p>GUI have submitted a Housing Demand and Socio-economic Assessment, November 2011 which assesses in detail the actual housing demand for the borough and Berkhamsted. The calculation is based on the latest household and population projections. It concludes that 13,246 additional dwellings are required within the CS Plan Period to meet the actual housing demand and needs of the borough.</p> <p>The CS's supporting Sustainability Appraisal (September 2011) states that the delivery of 10,750 dwellings to 2031 would "have adverse effects on some environmental objectives" but would "provide a balance between housing provision and planned new job creation". It adds that a higher housing target of 13,450 (based on 2008 ONS projections) would have "adverse effects on many environmental objectives" and "the imbalance between new homes and jobs could create issues relating to an under supply of jobs". It does however acknowledge that this higher growth level</p>	<p>"Local Objectives" for Berkhamsted of the Core Strategy Plan.</p> <p><b>C: Recommended Insertion of New Allocation Policy (as worded below in bold and italics)</b></p> <p><b>Site Reference: Proposal LA5</b></p> <p><b>Site Location: Land South of Berkhamsted as defined on the Berkhamsted Vision Diagram (by way of red line boundary) and defined in the Concept Plan (identified at Appendix 1).</b></p> <p><b>Proposals: Phased delivery of around 800 dwellings as a development capacity target including affordable in accordance with Policy CS 19</b></p> <p><b>Principles: Within the area identified at Land South of Berkhamsted a sustainable, well designed mixed-use development will be delivered by 2020/21 including:</b></p> <p><b>1) Phased delivery of around 800 dwellings as a development capacity target including affordable housing in accordance with Policy CS 19;</b></p> <p><b>2) Appropriate retail and leisure facilities;</b></p> <p><b>3) Social and physical infrastructure (including land provision for one new primary school);</b></p> <p><b>4) Improvements to transport capacity along the A41, Chesham Road and Swing Gate Lane including the provision of the East and West Avenue Link</b></p>		

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													<p>would "better meet natural population growth needs", result in "greater provision of affordable housing" and "help maintain viability of existing services whilst also encouraging the provision of new facilities" (Page E-30, Appendix E: Policy Assessment).</p> <p>The draft policy target figure of 10,750 additional dwellings to be provided to 2031 is therefore significantly under-estimated (by 2,450 additional dwellings borough-wide). No definitive evidence has been put forward to justify this reduction, without which the overall housing target is considered to be fundamentally flawed.</p> <p>On this basis, draft policy CS17 should therefore propose an annual target of some 530 dwellings per annum in order to meet forecasted natural household growth in the borough (13,200 divided by 25 years).</p> <p>The exclusion of windfall provision for the first ten years in the calculation of housing supply policy CS17 is generally supported (in accordance with national policy). However, the reasoning for including this windfall provision in draft Table 8 is ambiguous. For the above reason, the additional 13,246 unit requirement (to 2031) should replace DBC's additional housing requirement figure of 11,320 currently identified.</p> <p><b><u>(2) DBC's Housing Target and Land Allocation at Berkhamsted</u></b></p> <p>The proposed housing target for Berkhamsted in draft Table 8 and the Strategic Sites and Local</p>	<p><b>Road (connecting the aforementioned existing roads south of the town);</b></p> <p><b>5) Measures to improve accessibility by non-car transport modes along the local road network around and serving the town to include a possible bus service along the new link road,</b></p> <p><b>subject to viability at the time of a later planning application;</b></p> <p><b>6) New and improved open space and pitch provision.</b></p> <p><b>Delivery:</b></p> <p><b>A comprehensive planning framework is needed to link various land uses and their phasing.</b></p> <p><b>Development will be programmed in order to enable a capacity target of some 800 units by 2019/2020.</b></p> <p><b>New and improved social and transportation infrastructure (to include the potential for a new road link) will form part of the development where a detailed masterplan will explore these aspects further.</b></p> <p><b>Infrastructure provision will be phased in a sustainable manner commensurate with the quantum of new housing per development phase and as part of a viable and deliverable planning and</b></p>		

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													<p>Allocations identified in draft Table 9 are not considered to be based on any robust evidence base. DBC's housing evidence does not (1) properly examine locally generated housing needs and demands based on natural population (and household) growth at Berkhamsted and (2) sufficiently assess the identified sites' appropriateness in accordance with PPS3 (PPG2) and other national planning-related criteria.</p> <p>In particular, Berkhamsted, as an important market town, has not been given the opportunity to enhance its function and vitality and its overall contribution to the borough's socio-economic activity by being identified for any form of new strategic development.</p> <p><u>a) Actual Housing Demand and Needs at Berkhamsted</u></p> <p>There is no robust evidence from the Authority to indicate how a target of providing an additional 1,180 dwellings for Berkhamsted (draft Table 8) has been derived.</p> <p>The detailed analysis undertaken in the appended Housing Demand &amp; Socio-Economic Assessment, November 2011, which forms part of GUI's Planning Submission based on the most recent data available, shows that the demography of Berkhamsted is more dynamic than that generally seen in Dacorum.</p> <p>It outlines that this is unlikely to have been taken into account in the various projections produced so far by Dacorum - and as a result there has been a substantial underestimation of the amount of</p>	<p><b><i>phasing strategy. This approach will support a detailed planning framework and later phased planning applications.</i></b></p> <p><b><i>The promoters will work with Dacorum, Hertfordshire County Council and other key stakeholders in developing the detailed planning framework and in particular reviewing the new and improved infrastructure provisions.</i></b></p> <p><b><i>If delivery is not met in the above timescales, the land will continue to be identified in the Plan for meeting the borough and town's longer-term development needs within the Core Strategy Plan period.</i></b></p>		

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													<p>future new housing likely to be required at Berkhamsted.</p> <p>More specifically, GUI's Housing Demand &amp; Socio-Economic Assessment identifies the need for Berkhamsted and Northchurch to provide 2,871 additional dwellings over the CS period to meet forecast levels of natural population and household growth. This assumption is based on the latest</p> <p>ONS statistical data (2008) which should be applied. In fact DBC has actually acknowledged that this data should be considered but that the borough is instead subject to economic growth and environmental constraints. Meeting future housing demand is the foremost consideration (in national policy) whilst supporting new development at the most sustainable locations. New homes create economic regeneration and in terms of environmental constraints, most of the DBC's settlements are contained by Green Belt and it should be accepted that the housing need is an exceptional position to consider sustainable land release where the needs and demands are across the borough.</p> <p>This figure should be reflected in draft Table 8 of the Pre-Submission Core Strategy.</p> <p>DBC's housing trajectory identifies capacity for 853 dwellings on defined sites with a further 60 dwellings on Local Allocations. An additional 277 dwellings are estimated on undefined sites. This provides for a total of 1,190 additional new homes to be planned for by DBC's calculation, however, their Table 8 defines a 1,180</p>			

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													<p>requirement. Again, this highlights discrepancies in DBC's assessment of housing demand and need. When set against the actual housing demand requirements set out in GUI's Housing Demand &amp; Socio-Economic Assessment, there is a deficit of 1,691 dwellings (when set against the DBC's planned 1,180 figure) to meet local demand at Berkhamsted over the plan period.</p> <p>GUI's Housing Demand &amp; Socio-Economic Assessment demonstrates that only 41.1% of local housing demand would be met through the current allocation in the Pre-Submission Core Strategy. Not only will this result in a net outward migration of people from Berkhamsted but it will also result</p> <p>in the already high house prices being exacerbated as demand rises. This in turn will result in an uneven impact across the population with first time buyers and all local income groups being largely excluded from the town.</p> <p>Restricting the expansion of Berkhamsted, as the second largest settlement (in terms of population size and critical mass of services and facilities) will result in Dacorum not fully realising its future potential in terms of housing and economic growth.</p> <p>There is no doubt that the objective of meeting local housing demand must be balanced against competing objectives in the Core Strategy. These objectives include limiting the impact on the Green Belt and landscape designations, both of which constrain much of Berkhamsted's boundary.</p>			



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													<p>Other assessments on these issues and other environmental constraints that accompany this submission show that the land south of Berkhamsted can be released from the Green Belt without a significant impact on the integrity of the designation or the environment. In the fact, the proposals</p> <p>aim to achieve a number of CS vision objectives and commonplace strategies and objectives to include those more specifically concerning Berkhamsted.</p> <p>Whilst the concept is currently at a very initial stage, it is anticipated that it will have a development capacity target of some 800 units over the early part of the Core Strategy period. This will increase supply to 1,990 dwellings. Whilst this does not meet the total local need of 2,871 dwellings, it does substantially improve the situation from 41.1% provision to 69.3%.</p> <p>The remaining need for 881 dwellings is unlikely to be met within the town without a review of employment land or expansion onto significantly more sensitive greenfield land, neither of which are recommended. Instead this demand will need to be met elsewhere in the borough, most likely Hemel Hempstead. It is through this mechanism that focusing development on Hemel Hempstead can be undertaken sustainably.</p> <p>In conclusion, DBC has fundamentally underestimated the future housing needs and demands for the town of Berkhamsted. This makes the CS Plan unsound without amendment to draft Table 8 (as</p>			

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													<p>recommended below).</p> <p>b) Land to South of Berkhamsted is <u>considered the most sustainable and suitable location at the edge of the town to assist in accommodating some of the town's future housing demands and needs.</u></p> <p>Berkhamsted has a tightly defined settlement boundary and a relatively dense urban form which limits the opportunity for new residential development within the town. For example, Dacorum's Strategic Housing Land Availability Assessment (SHLAA, October 2008) identifies that, of the 109 identified urban housing sites within the existing housing settlement boundary of Berkhamsted, only 28 sites were deemed suitable by the Council which gives a general impression of the limited urban potential.</p> <p>Notwithstanding the town's constrained urban potential, Berkhamsted could have the ability to accommodate significant future housing growth to assist the borough in meeting its future housing requirements whilst enhancing the town's status (in a complementary role to Hemel Hempstead) and investment potential.</p> <p>On this basis, the Council will need to consider the release of Green Belt and greenfield land around Berkhamsted to accommodate housing growth in the future.</p> <p><i>Alternative Growth Locations</i></p> <p>Green Belt land to the north, west and east of Berkhamsted is constrained by AONB and other</p>			

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													<p>environmental designations which potentially restrict these areas in accommodating new strategic development around the town.</p> <p>GUI's Sustainability Appraisal Review (prepared by Savills, dated November 2011) which also supports GUI's Planning Submission shows that this site performs considerably better than other potential directions of growth to meet the housing demands of the town.</p> <p>The review undertakes a critique of the alternative Green Belt, greenfield locations around the town as part of a sustainability matrix assessment (using DBC's own SA objectives). It concludes that through this analysis, the southern location is the most sustainable location for new development in order to meet the town's future housing demands and needs.</p> <p>GUI's SA review also considers other much smaller sites identified by landowners and the Council as Strategic Sites and Local Allocations in terms of the sustainability. An assessment of these sites alongside a suggested ranking is found at Appendix 1 of the SA Review Document.</p> <p>Land South of Berkhamsted also performs well when benchmarked against the two larger proposed greenfield "Local Allocations" in Hemel Hempstead. It is acknowledged that Hemel Hempstead is the main focus for future development growth although some of the strategic sites and "Local Allocations" at the town could be questioned in terms of their</p>			

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													<p>overall development capacities.</p> <p>However, the suitability of development proposals at Land South of Berkhamsted compared against sites at Hemel Hempstead indicates that the site could have a positive role in complementing future development growth at Hemel Hempstead and could contribute not only to the town's local housing needs but also to the wider parts of the borough.</p> <p>Consolidating future development at Land South of Berkhamsted should also avoid the need to release Green Belt, greenfield sites at smaller, more constrained settlements to include smaller market towns such as Tring and the other villages. These smaller settlements are unlikely to be able to sustain strategic development growth by the nature of their more limited existing services, facilities and retail provision. This strategic development approach would also avoid town cramming more generally within the town.</p> <p><i>Land South of Berkhamsted</i></p> <p>DBC's Alternative Site Assessment (2010) correctly recognises in relation to Land South of Berkhamsted that "Berkhamsted continues to command high house prices locally and collectively the land should prove attractive to the market" and that "it is of a scale that should be able to meet demands for associated infrastructure and affordable housing". It further adds that "given the scale of the land there is significant scope to secure other non residential uses, particularly open/leisure space. While at a distance from the town</p>			

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													<p>centre and employment areas, it is of a scale that could contribute towards improved public transport (community bus hub)" and "there are no fundamental constraints to prevent the sites coming forward if allocated for housing."</p> <p>However, the Officers' Conclusion states that "the scale of proposal is clearly contrary to national Green Belt policies and beyond that needed to meet the predicted housing growth of Berkhamsted to 2031. It would have a major impact on the character and setting of the town, and lead to</p> <p>pressure to develop open countryside southwards towards the A41. While the site has the potential to deliver new community facilities, improve public transport, and contribute towards meeting deficits in open/leisure space, it would also put significant pressure on existing infrastructure such as roads and schooling. Smaller parcels in theory could be considered, but these also prove problematic in respect of their poor relationship to existing housing, proximity to the A41, local impact on open countryside, and poor direct access on to local roads. These sites proved very unpopular with local residents during the consultation on the Site Allocations DPD during late 2008."</p> <p>As mentioned above and as referred to in GUI's Housing Demand &amp; Socio-Economic Assessment (November 2011) which supports these planning representations, the Officers' Conclusion is misinformed in terms of the development being "beyond that needed to meet predicted housing</p>			

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													<p>growth at Berkhamsted to 2031."</p> <p>There is a clear need for strategic new development at the town. It has been demonstrated that Land South of Berkhamsted is the most sustainable and suitable development location. To the south of the town there is existing education and recreational development and DBC has identified Ashlyns School and the BFI as Major Developed Sites (MDS) in the Green Belt - all of which starts to set a precedent for further new development up to the built boundary of the town, the A41.</p> <p>A Concept Plan has been prepared in connection with the Development Proposals and various technical assessments have been undertaken to underpin and support this Concept. The Concept Plan and the technical assessments are found at GUI's submitted Planning Document forming part of their evidence base. This document also appends a Housing and Infrastructure Delivery Trajectory which demonstrates the delivery of the new development in a viable and sustainable way taking into account associated infrastructure costs amongst other factors.</p> <p>The development proposals at Land South of Berkhamsted are associated with a proposed local package of socio-economic and environmental benefits to the town (and the wider part of the borough).</p> <p><i>Infrastructure Benefits</i></p> <p>An extensive amount of technical work has already been undertaken to support the principle of new development at Land at South</p>			

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													<p>Berkhamsted and which has been shared with DBC, Hertfordshire County Council (HCC) and other key stakeholders. A Concept Plan forms the development</p> <p>proposals which has importantly been underpinned by various technical assessments to include transportation, environmental and landscape, ecology, heritage and visual impact, and a housing and infrastructure delivery trajectory (HIDT) - all of which form part of GUI's Planning Document in response to DBC's Pre-Submission CS.</p> <p>A comprehensive community engagement programme has also ensured that the Concept Plan is informed by, and meets the needs of, local residents and their families, stakeholders and interest groups. This community consultation and engagement process was managed by GUI and a report on the outcomes and how the Concept Plan has responded to concerns is outlined in the SCI.</p> <p>The new development results in a package of significant socio-economic and environmental improvements including: the provision of a link road and bus loop to serve the existing town and new residents; a local village centre with supporting community / leisure facilities; open green space; allotments and community orchards; enhanced primary education provision; the creation of local employment opportunities; the provision of wider rural links; and overall town centre regeneration and improvement to local facilities as a result of increased spending</p>			

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													<p>power.</p> <p>This has resulted in a Concept Plan which represents a bespoke vision for a new neighbourhood to the south of the town, building on the unique opportunities inherent in these development sites. A holistic design approach has ensured transport, landscape, sustainability and social infrastructure are integrated in a way that continues the town's unique market town character and creates a neighbourhood with a real sense of place.</p> <p>The resulting 770 unit scheme represents a good planning, design and sustainability response to the site. GUI asks DBC to consider an allocation for some 800 units as a development capacity target for the site and subject to a detailed masterplan at the later stages of the development process.</p> <p>The Planning Document and appending technical assessments which form part of GUI's submission examines these benefits in detail.</p> <p><i>The Local Issues</i></p> <p>A consultation event took place (in late 2008) to explore Berkhamsted's key issues. The Place Workshop for Berkhamsted took place in September 2008. Attendees included Councillors, local businesses and residents. The key messages from the discussions at the Workshop were outlined in the Council's "Berkhamsted Place Workshop Report" (October 2008) and were considered positive in</p>			



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													<p>relation to potential housing development at parts of the land to the south of Berkhamsted. More importantly, the majority of the land to the south of Berkhamsted was outlined, at the time, as being "suitable" for housing (as per Figure 1 of the workshop report).</p> <p>In particular, stakeholder discussion at this workshop included consideration towards outward expansion of Berkhamsted stating that "the A41 bypass forms a new 'natural' southern boundary for the town" and more specifically the "area between Kingshill Way/ Shootersway therefore</p> <p>presents itself as an easy place for development, due to fields, copses and general areas being 'trapped' by the bypass and other boundaries." More general aspirations in relation to the future of Berkhamsted were discussed at the workshop which included the need for improvement of social and transport infrastructure in and around Berkhamsted and the provision of more affordable housing. Land to the south of Berkhamsted offers a solution to meet these above local objectives.</p> <p>GUI undertook a community engagement process during this year (2011) and the Concept Plan aimed to address many of the local community's concerns. Details are found at the Planning Document (at Appendix 8).</p> <p>It is acknowledged that the local community are not supporting the Proposals. However, DBC also needs to decide, beyond the political pressures to be conservative in growth, that future</p>			

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													<p>housing needs and demands for the town will only benefit the community's future generation's housing needs and demands if new development is allowed to take place. This will mean that the younger generations of the existing community will be able to afford to stay in their home town and in turn retain and enhance the town's function and vitality - one of the key strategic and local objectives for the town within the CS Plan.</p> <p><i>Concluding Commentary</i></p> <p>All of the above evidence illustrates that Land South of Berkhamsted is considered the most logical and sustainable development option at the town in terms of PPS2, PPS3 and other national planning-related criteria and guidance to include the NPPF. It will also ensure the delivery of a</p> <p>package of local social and transportation infrastructure benefits which are intended to significantly improve the long term functioning and vitality of the town. These aspects are considered to respond to the comments identified in the Officers' Conclusion in DBC's Alternative Site Assessment (2010) as well as positively addressing the "Strategic Objectives" and "Common Local Objectives" identified in the CS Plan.</p> <p><b>Conclusions on soundness of draft Policy CS17, draft Table 8 and draft Table 9</b></p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are not justified on the basis that the housing targets on which they are based are not supported by a robust and credible</p>			

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													<p>evidence base nor are they effective as their approach would not deliver the quantum or distribution of housing needed in the Borough.</p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are not consistent with national policy because they are based on housing targets which do not sufficiently meet local housing needs and natural household and population growth projections.</p> <p>By identifying the actual projected level of housing growth required borough wide and at Berkhamsted, and further by identifying Land South of Berkhamsted as a Housing Allocation for development purposes, the strategic and local objectives of the CS Plan will be achieved whilst also meeting key objectives contained in PPS1, PPG2, PPS3 and the NPPF.</p> <p><b>Footnotes:</b></p> <p>1. DCLG. May 2007. Housing Market Information Advice Note.</p> <p>2. DCLG. August 2007. Strategic Housing Market Assessments Practical Guide.</p> <p>3. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 8.7.</p> <p>4. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 1.13.</p> <p>5. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 14.16.</p>			
498429	Steve Baker	CPRE - The Hertfordshire Society					Table 9	Table 9	Objecting	Yes	No	a) Justified	Table 9 should be amended to remove the six Green Belt sites included as Local Allocations.	Then 'Number of Homes' total to be revised and six Local Allocations to be deleted.	Yes, I wish to participate	To ensure that the Inspector's Examination is

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													These sites are not required to meet the dwelling target of 9,835 consulted on as Option 1 by the Council in the draft Core Strategy and supported by CPRE Hertfordshire.		at the oral examination	fully informed of the Planning Issues of concern to CPRE Hertfordshire.
502504		Trustees of Piers Williams	502501	Mr Stuart Williamson	AMEC		Table 9	Table 9	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>Land for around 100 new homes on 'unidentified locations' i.e. windfalls, still needs to be found to meet the requirement to 2031.</p> <p>To save placing reliance on one Greenfield option and windfall sites, we recommend the allocation of alternative smaller option at Station Road, Tring to assist in delivery should land at West Tring not be delivered or if further sites are required. This would be consistent with guidance in PPS12 which states that Core Strategies will need to be flexible to account for sites not delivering as anticipated. PPS12 sets out the need for flexibility and this longer term view, in order to provide certainty to communities and investors, and to guide the direction of infrastructure (see paragraphs 4.14-4.15).</p> <p>Overall, there are no major constraints to prevent the site coming forward for development. It is available, suitable and achievable in relation to the PPS3 criteria. It is considered that the site would meet the criteria set out in Policy CS2 of the draft Core Strategy 'Selection of Development Sites'.</p>	The Core Strategy will need to build in as much flexibility as possible to accommodate unforeseen circumstances and sites unlikely to deliver. This could include some reserve land or additional allocations, such as our clients' land at Station Road, Tring.	Yes, I wish to participate at the oral examination	To expand on the points raised in these submissions and assist in the EiP process.
502874	Mr Chris Bearton	Hertfordshire County Council					Table 9	Table 9	Objecting	No	No		It is recognised that given the approach taken and the level of detail available within the Core Strategy, that it is not possible to identify exact site boundaries or the			

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													possible access / egress points. However, there is some concern that there may be some technical access issues associated with some Local Allocations that are identified in the Core Strategy, in particular in relation to compliance with the road hierarchy, national and local policy on sustainable transport. These issues will need to be addressed through the discussions between the Borough Council and the Local Highways authority but are likely to be surmountable.			
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Boyer Planning		Table 9	Table 9	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy.  Table 9 contains insufficient allocations to accommodate the housing requirement - see Section Five of Statement.  The list of Local Allocations on pages 177-178 contains insufficient allocations to accommodate the housing requirement - see Section Five of Statement.	Shendish should be added to Table 9 with a capacity of <b>900</b> dwellings. Further consideration should be given to the suitability of West Hemel Hempstead, especially the southern section, and the omission of urban extension sites at Hemel Hempstead from the category of Strategic Sites.  Subject to our representation regarding potential strategic allocations (see representation in respect of Table 9) Shendish should be added to the list of Local Allocations.	Yes, I wish to participate at the oral examination	Significant issue relating to housing provision spatial strategy, Hemel Hempstead Place Strategy.
619677		Blackjack Investments Ltd	398614	Mr Mark Flood	Insight Town Planning		Table 9	Table 9	Objecting	Yes	No		The Core Strategy is unsound because it is not justified and is not consistent with national policy.		Yes, I wish to participate at the oral examination	
620224	Mr Stephen Harris	Emery Planning Partnership					Table 9	Table 9	Objecting	No	No	c) Consistent with national policy	Emery Planning Partnership is instructed by Waterside Way Sustainable Planning Limited (WWSPL) to submit representations to the Core Strategy Pre-Submission Draft.  Our specific interest is the land to the north of Icknield Way, Tring, known as "Waterside Way", which	In light of our representations above, we consider that Waterside Way is a suitable and sustainable location for allocation through the LDF and should be considered accordingly.  We consider that the policy below should be included in the Core Strategy. It should be noted that	Yes, I wish to participate at the oral examination	

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													<p>we propose for a sustainable residential and leisure development. These representations are accompanied by a schematic masterplan which provides a visual interpretation of the proposals for the site and supporting documentation. This is the proposal which has been actively promoted through the previous versions of the Core Strategy and we maintain that the site should be allocated in the final document.</p> <p>Whilst we support the recognition that Tring should have a level of development which requires a Green Belt review, we object to the proposed level of housing development and the identification of the land to the west of Tring as the sole allocation for residential development.</p> <p>These representations set out our case accordingly. Our specific objections are to:</p> <ul style="list-style-type: none"> <li>Policy CS1 Distribution of Development;</li> <li>Policy CS2 Selection of Development Sites;</li> <li>Policy CS3 Managing Selected Development Sites;</li> <li>Policy CS5 Green Belt; and,</li> <li>Policy CS17 New Housing.</li> </ul> <p>Before assessing the policies we set out below a description of the site and the benefits it can deliver to Tring.</p>	<p>this is in draft based on current proposals and is subject to change.</p> <p>"At Waterside Way, Tring, a site with a net developable area of about 5 hectares is allocated for 300 dwellings as defined on the Proposals Map.</p> <p>The development of the site will require the following:</p> <ol style="list-style-type: none"> <li>1. The provision of new formal playing pitch facilities, clubhouse, spectator facilities and car parking of approximately 2.45 hectares (6 acres) for Tring Corinthians FC;</li> <li>2. The provision of a marina on the Wendover Arm of the Grand Union Canal with approximately 30 moorings;</li> <li>3. The provision of 35% affordable houses to meet local needs;</li> <li>4. The provision of approximately 1 hectares (2.5 acres) of public open space within the development including a fully equipped children's play area;</li> <li>5. The provision of additional tree planting and landscaping involving the planting of native species wherever appropriate;</li> <li>6. The provision of an integrated cycle way and footpath provision</li> </ol>		

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													<p><b>2. THE SITE</b></p> <p>Waterside Way is an 8.9 hectare (22 acre) site to the north of Icknield Way, Tring, which currently has 'set-aside farmland' status.</p> <p>The site is designated as Green Belt, however the Core Strategy accepts that Green Belt land will now be required around Tring to meet its housing needs. As will be noted from these representations, the level of the housing need is one of our main concerns within the Core Strategy. We consider that Waterside Way is an excellent opportunity to help meet the town's housing and leisure needs.</p> <p>We have undertaken environmental and technical studies of the site, which have led to the production of the schematic master plan, which is enclosed as Appendix EPP1. The site is available, achievable and suitable as required by PPS3.6540-SH-dr December 2011 Page 2 of 17</p> <p><b>Schematic Masterplan</b></p> <p>Following the environmental and technical studies, M3 Urban Design was appointed to produce a Schematic Master Plan for the site. This master plan will evolve but it shows the potential housing and leisure benefits the site can deliver.</p> <p>The unique advantage that the site has over the other potential Green Belt sites is its location adjacent to the Wendover Arm of the Grand Union Canal. This enables the development to provide a leisure and tourism element to the town, bringing the Wendover Arm back to being a destination in</p>	<p>connecting to the existing network;</p> <p>7. The provision of traffic calming measures within the development and locality as approved by the County Highways Authority.</p> <p>8. The provision of bus stops and shelters at appropriate locations to serve the new development.</p> <p>It is proposed to allocate a site with a gross area of 11.35 hectares (28 acres) and a net developable area of about 5 hectares (12.3 acres) on land at Waterside Way for about 300 dwellings. This site will form a natural extension to the existing and emerging built up area of Tring as far as the Wendover Arm of the Grand Union Canal and will provide an opportunity to secure enhanced formal playing pitch provision for the Tring Corinthians, enhanced use of the canal and will form a green edge to the urban area."</p>		

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													<p>its own right and improving the local economy. The Master Plan includes a marina and British Waterways confirm that there is sufficient capacity for a new marina for some 50 boats.</p> <p>The second key leisure element is the enhancement of the facilities at Tring Corinthians Football Club. The club's existing facilities consist of a football pitch with small changing rooms. WWSPL has been in discussions with the football club with regard to their future aspirations and whether these aspirations can be met within the development. As a result of these discussions, the proposals incorporate an enhanced pitch, an additional training pitch, clubhouse and changing rooms, car parking and limited spectator facilities.</p> <p>In many new developments the open space provision is on the periphery of the development and functions as a subordinate element of the design. With Waterside Way a wholly different approach is being taken. The network of homes are organised by overlaying the open space provision within the interior rather than on the extremities of the proposed built form, thus creating an integrated 'eco-urban' residential setting.</p> <p>The Schematic Masterplan sets out pedestrian, bicycle and vehicular circulation networks providing a broad range of use, scale, material, and surface. The circulation design principles are as follows:</p> <p>prioritise pedestrian and bicycle circulation to reduce</p>			



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													<p>reliance on the private car; provide for a multi-use recreational loop path, pathways and boardwalks, canal trails and botanical paths; present resting and seating areas, decks, platforms, and event strips; and integrate parking areas, footpaths, road crossings, street tree plantings, and stormwater bio-swales.</p> <p>The design specifically promotes open space, recreation and leisure with a network of fields, meadows, woods, outdoor rooms, canal walks and botanic gardens. Other social spaces contained in the proposal include event and market platforms, children's play areas, exploration gardens, and picnicking areas.</p> <p>A planting strategy has been developed to enrich and diversify the ecology and habitat on the site. A range of site specific environmental principles will drive this area of work; with the underlying theme of promoting key connections and opportunities in enhancing local ecology and habitats.</p> <p>The residential distribution is envisaged to provide a mix of housing types and a range of housing densities (i.e. between 30 - 50 homes per hectare). This could accommodate up to 300 dwellings although this figure is completely flexible at this stage and can be altered to reflect demand and need.</p>			

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398218		Hertfordshire County Council (Hertfordshire Property)	211007	Mr Richard Lewis	Vincent & Gorbing		Table 9	Table 9	Objecting	Yes	No		<p>The County Council would make its land at Dunsley Farm available for development in the event that the land at Icknield Way, West of Tring, is not able to be delivered or developed within the necessary timescale, or it is considered that the land at Dunsley Farm would represent a more sustainable development, or additional land is required for greenfield development at Tring either to meet current needs or longer term needs.</p> <p>The Land at Dunsley Farm is a suitable site for housing; it can be made available for development; and development could be delivered within the timescale of the Core Strategy. It is therefore a developable site, should it be required.</p>		Yes, I wish to participate at the oral examination	As a landowner Hertfordshire County Council would be happy to attend in order to confirm how the site could be made available in the event that is was identified as being necessary, as appropriate, or as a contingent source of housing land supply.
494131	Mr Michael Emmett	CALA Homes					Table 9	Table 9	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>The distribution of housing across the Borough is set out in Table 8, while Table 9 identifies those new sites, over and above existing commitments, expected to contribute to housing supply.</p> <p>Hemel Hempstead is proposed to accommodate around 78% (8,800 out of a total of 11,320) of the Borough's new housing. This compares with its current population which is in the order of 61% of that of the Borough's. It has already been accepted that it is entirely appropriate concentrate new housing in Hemel, however, due to a combination of this and a low Borough total, other settlements are allocated insufficient housing, resulting in their local needs being</p>	Table 9 (and Proposal LA5) - Replace "150" (capacity of Icknield Way local allocation) with "300".	Yes, I wish to participate at the oral examination	CALA Homes has a controlling interest in the Icknield Way Tring Local Allocation and as such has an important role to play in delivering a key element of the Core Strategy.

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													<p>unmet.</p> <p>For example, Tring is the third largest settlement in the Borough, with around 8% of Dacorum's total population, yet it is planned to cater for only 4% of future growth.</p> <p>While the Council's strategy of focussing new development on Hemel is fully understood , and could be supported if it was not to adversely impact on other settlements, particularly the more sustainable market towns, the fact that the total level of provision is so low means that such an approach inevitably deprives Tring of the opportunity to meet its local housing needs.</p> <p>The Council's own analysis (Population: Background Note for the Core Strategy April 2009) bears this point out. Under a nil net migration scenario, this points to a need for between 841 and 938 dwellings over the plan period (depending on the data and methodology used). The Core Strategy proposes just 430, barely half that required.</p> <p>Earlier this year CALA commissioned Barton Willmore to critique this analysis; their report is attached as Appendix 3. While this concludes that a higher still number of homes is required, the more important message in their work is the adverse impact of under-provision on the local community; the population will age as young people are priced out of the local housing market. It will certainly not result in the socially inclusive community to which the Core Strategy aspires.</p>			

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													Based on comments made in respect of Proposal LA5, CALA seeks an increase in the capacity of the Icknield Way allocation in Table 9 to 300 homes, while in the light of the observations made above, it is considered that the distribution to Tring in Table 8 should be increased substantially. While no specific alternative figure is proposed, it is suggested that this increase is at least 150 dwellings (to 630) to equate to the increase sought to the Icknield Way site capacity.			
494847		Trustees of Drayton Beauchamp Parochial Charities	626780		Cole Flatt & Partners		Table 9	Table 9	Objecting	Yes	No	c) Consistent with national policy	Tring Place Strategy and Proposal LA5  Whilst supporting the Borough Vision and the Vision for Tring as set out below paragraph 22.2 of the CS, it is strongly contended that three elements of the CS severely impede the fulfilment of the Vision. The delayed release of the local allocation for Tring via Policy CS3 and the distribution of just 480 new homes to the town have already been addressed. The third concern is the capacity of this allocation of around 150 dwellings, which is considered to be far too low both in the context of the scale of need and given the size and development potential of the site itself.  CALA currently controls 7.6ha excluding land in the AONB. A further 2.1ha will become available by the inclusion of adjoining land to the south, providing a total developable area of 9.7ha (the two land owners represented by Cole Flatt & Partners).  It is understood that the Council wished to provide for the potential expansion of the adjoining Icknield Way Industrial Estate by replacing	Refer to response to question 4 above.	No, I do not wish to participate at the oral examination	

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													<p>the existing, unimplemented, local plan employment allocation at Miswell Lane with an area of similar size (0.8ha) within the CS Icknield Way local allocation.</p> <p>This would of course increase the provision of affordable housing on the site to 120 homes which, given the unaffordability of Tring, both in absolute terms and relative to Dacorum Borough as a whole, must be a significant community benefit.</p>			
617337	Ms Yvonne Crocker	Northchurch Parish Council					Table 9 SS1	Table 9	Objecting	No	No		<p><b>Land at Durrants Lane &amp; Shootersway, Berkhamsted</b></p> <p>Having studied the largest development for this strategy which will have a large impact on Northchurch and Berkhamsted, I have the following comments to make which certainly have not been, so far, answered to satisfaction.</p> <p>The development is: <b>Land at Durrants Lane &amp; Shootersway Berkhamsted</b></p> <p><b>Framework Masterplan Document Revised October 2011.</b></p> <p>And is produced by <b>Dacorum Borough Council</b> with their co-partners in this scheme, <b>Taylor Wimpey, Egerton Rothesay School, Hertfordshire County Council.</b></p> <p>This area of Land was released from Green Belt at the time of the forming of the Borough Plan, which was confirmed in April 2004.</p> <p>The area of land referred to in this plan was 8.3 hectares, which was to provide for the school dual-use playing fields and informal leisure</p>		Yes, I wish to participate at the oral examination	

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													<p>space, plus a net capacity of 100 dwellings. 4.4 hectares of land for residential purposes would now not provide enough homes to finance the facilities each partner requires for this site. Around six hectares is not to be used for residential purposes, which would now number 180 dwellings.</p> <p>At the meeting on 26<sup>th</sup> July, Cllrs Pike, Hooper and Dunbavand attended for Northchurch Parish Council, and Cllrs Handy, Reay and Laws for Berkhamsted Town Council. At this meeting, all elements of this proposal were discussed. We three from NPC felt it to be a most useful meeting.</p> <p>The local councillors were united in feeling that aspects of the INFRASTRUCTURE were not at present satisfactory, whereas the report says that it is! (<i>See Services and Utilities, point 4.21 in the booklet</i>).</p> <p>For instance, sewers are not satisfactory now in Coppins Close, as reported by Cllr Handy of Berkhamsted Council. The main sewer doesn't reach Bell Lane which the overflow, (STILL GREEN BELT) sports field and possible allotments back onto; surely a toilet or two would be required?! The water pressure is already very low at times and quite often need repairs, which means no water for several hours (as has occurred twice in Upper Darrs Lane in the last six months).</p> <p>The main fault with infrastructure is of course the roads. The access for the housing next to Coppins Close would be off Shootersway. Obviously the increase in homes</p>			

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													<p>along Shootersway, and children being taken to the enlarged school and its sporting facilities seven days a week, would put tremendous pressure on all existing accesses. The other access is at the top of Durrants Lane: a roundabout has been suggested, which will mean buying land opposite where the land mine exploded during the war (I remember that night very well). My favoured option would be to make a roadway off Shootersway, close to the first roadside houses to be built and running adjacent to Shootersway until one reaches Durrants Lane, near to where the access would be to the school. This would then mean that the quite tricky access by the Lodge could be closed. (Mrs Jane Elphinstone who lives in the Lodge has had the brick gatepost demolished three times in the last ten years. Without it being there, her home would also have been in very great danger).</p> <p>The junction at Kings Road for Shootersway is a nightmare, and has been for the last twenty years. And although it says improvements will be made, I recall that before the bypass was built, it was Berkhamsted Councillors' main headache. I remember it well, having been a Town Councillor myself there until 1987, when the bypass was then of great importance. It was discovered that it would, at that time, cost in excess of £300,000 to put in a roundabout. However, the main sewers, water supplies, electricity and gas would be interrupted to achieve a roundabout, so the idea was quickly dismissed.</p> <p>Added to the bottleneck already existing (and to be worsened by this proposed development), we have a</p>			

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													<p>further problem should this number of houses need to be increased to meet the local target. The house within 100 yards of the Kings Road junction known as "Hanburys", which is at present one large house, is about to be permitted for development of up to another sixty dwellings. This will make matters even worse at what could be a newly developed junction at Kings Road.</p> <p>Suggestions that Durrants Lane should have slower traffic etc, will mean an even worse "rat-run" for those of us who live in Darrs Lane. This starts at about 6.30am and continues until 9am; it commences again with schools exiting at about 3.15pm until 6pm at least. And this traffic also has a great effect on Northchurch High Street. I note from our joint meeting in July, Group 1 suggested Durrants Lane should be made less "user-friendly" as a rat-run. Durrants Lane is wider than Darrs Lane and has a footpath from top to bottom. Darrs Lane has no footpath at all from just south of St Mary's Avenue to its junction with Shootersway. We now have quite a few children who walk during term-time down to the village to catch buses to various schools. Personally I consider that they are in danger walking down from Shootersway to the village about 8am. Now it will get worse, and nothing so far has been done about this at HCC, although I have pressed Our HCC Cllr David Lloyd many times.</p>			
621376		Dennis Jean Properties					Table 9	Table 9	Objecting	Yes	No		I would like to put this land: Home Farm Pea Lane, Northchurch HP4 3SX forward for inclusion in your allocations under the core strategy			



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													<p>on behalf of Mr Michael and Neville Watts of George Lloyd.</p> <p>Although we consider that the land is considered high landscape value we also note it is adjacent to other housing and would appear to be located in a perfect position to extend the existing properties and housing allocation that is so badly needed.</p> <p>Could you therefore include this land in your forward planning in relation to the core strategy of Northchurch Berkhamsted.</p>			
625293		BIDWELLS					Table 9	Table 9	Objecting	No	No		<p>Our client supports the general principle of development within the West Hemel Hempstead location and development strategy for growth within the Borough (Policy CS1).</p> <p>With specific regard to development West of Hemel Hempstead:</p> <p>Table 9: The number of homes in respect of West Hemel Hempstead should be changed to "around 900". As presently worded, the number could not exceed 900, notwithstanding that at the Planning Application stage the Site may have greater capacity without conflicting with the Local Development Framework.</p>			
625438	Mr Chris Ball		625439	Mr Adam Halford	Bidwells		Table 9	Table 9	Objecting	Yes	No			<p>All references to Hanbury's to be replaced with "Hanbury's and The Old Orchard" (including Table 9).</p> <p>Table 9 on page 107 to refer to Habury's and The Old Orchard and under the "number of homes" to state 65 to 75.</p>	Yes, I wish to participate at the oral examination	It is our belief that Allocation Proposal LA4 is important to meeting the new homes targets set out in the Core Strategy and it is therefore

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																important that the site is represented at the examination.
626260		W J Mash & Sons	597730	Mr Peter Smith	PJSA Ltd		Table 9	Table 9	Objecting	Yes	No	a) Justified	<p>It is unsound because it is not Justified or Consistent with national policy.</p> <p>Our representations set out the merits of providing for a local review of the Green Belt within Dacorum Borough, between the Berkhamsted and Hemel Hempstead urban area, identified in the EEP as a Key Centre for Development and Change.</p> <p>Our client owns land at Bovingdon Airfield, (see land edged red on the attached plan), located within the Green Belt (as presently defined), situated to the south west of Hemel Hempstead. The site extends to approximately 6 hectares (ha) and is approximately 1 mile from local services and facilities. The site is accessible by the bus route.</p> <p>It is on the boundary of Dacorum Borough and Chiltern District, between Hemel Hempstead, Berkhamsted and Chesham. The proposed site represents a sustainable location for growth, close to the centres of these three towns, and can represent an example of cross administrative collaboration to accommodate future needs for housing to sustain both Dacorum Borough and Chiltern District respectively.</p> <p>The site currently consists of an area of open space containing a speedway track, Conning Tower (World War 2 building) and earth bunds on scrub land. The site is generally void of any significant</p>		No, I do not wish to participate at the oral examination	

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													natural features or vegetation, although the boundaries are generally thick hedgerow or fencing. The site is partially viewed through the trees and hedgerow surrounding the airfield from Chesham Road.			
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners		Table 9	Table 9	Objecting	Yes	No	c) Consistent with national policy	<p>Whilst supporting both the Borough Vision and the Vision for Tring as set out below paragraph 22.2 of CS, it is strongly contended that three elements of the CS severely impede the fulfilment of the Vision. The delayed release of the local allocation for Tring via Policy CS3 and the distribution of just 480 new homes to the town have already been addressed. The third concern is the capacity of this allocation of around 150 dwellings, which is considered to be far too low both in the context of the scale of need and given the size and development potential of the site itself.</p> <p>CALA currently controls 7.6ha excluding land in the AONB. A further 2.1ha will become available by the inclusion of adjoining land to the south, providing a total developable area of 9.7ha (the two land owners represented by Cole Flatt &amp; Partners).</p> <p>It is understood that the Council wised to provide for the potential expansion of the adjoining Icknield Way Industrial Estate by replacing the existing, unimplemented, local plan employment allocation at Miswell Lane with an area of similar size (0.8ha) within the CS Icknield Way local allocation.</p> <p>This would of course increase the provision of affordable housing on the site to 120 homes which, given the unaffordability of Tring, both in absolute terms and relative to Dacorum Borough as a whole, must</p>		No, I do not wish to participate at the oral examination	

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													be a significant community benefit.			
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd		Table 9	Table 9	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  Table 9 sets out the preferred Strategic Allocations in the Borough and associated Local Allocations. It is considered that there is a glaring omission from the Table, of any sites in Apsley. The Trust's own vacant land could be seen as a mixed use site, with the potential to provide a good level of market housing, which would, and should form a further Local Allocation. Whilst the Council considers that it has identified sufficient land for housing to provide up to 11.320 dwelling units by 2031, this is very optimistic and needs to be kept under review. It is considered that given current and likely medium term economic prospects, housing completions will fall well below the 15% level of the Housing Trajectory referred to in Policy CS17.		No, I do not wish to participate at the oral examination	
6276 34	Mrs Anne Norah McWilliams		3132 30	Mr Edward Sibley	Sibley & Co		Table 9	Table 9	Objecting	Yes	No	b) Effective	There is insufficient land available to the Council to enable it to meet its projected target of the number of houses to be made available in the plan period (particularly in Hemel Hempstead itself) without the need to use green belt land for the development of a new neighbourhood centre in the vicinity of Shendish Manor.	The Council should re-consider its decision to exclude from its strategic housing policy the proposed neighbourhood centre in the vicinity of Shendish Manor as reflected in former council consultations under the heading "Blue Blob 3".	Yes, I wish to participate at the oral examination	Because the Council have decided to discard its former favourable consideration of a new neighbourhood centre in the vicinity of Shendish Manor without giving any reasons.
5978 06	Mr and Mrs M Kenealy		5977 30	Mr Peter Smith	PJSA Ltd		Table 9	Table 9	Objecting	Yes	No		It is unsound because it is not Justified and Consistent with national policy.  Land at Lower Road, Nash Mills, Hemel Hempstead2.5.1 Our representations set out the merits of	Please see attached report.  The release of land from the Green Belt can help deliver sustainable, mixed communities	No, I do not wish to participate at the oral examination	

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													<p>providing for a local review of the Green Belt within Dacorum Borough, adjoining the Hemel Hempstead urban area, identified in the EEP as a Key Centre for Development and Change.</p> <p>2.5.2 Our client owns the land at Lower Road, edged red on the attached plan, located within the Green Belt (as presently defined), situated to the south of Hemel Hempstead. The site extends to approximately 1.75 ha and is approximately 1 mile from local services and facilities. The site is accessible by the bus route.</p> <p>2.5.3 The site currently consists of an area of open space used once a week to hold the Nash Mills car boot sale on a Sunday. The site is generally void of any significant natural features or vegetation, although the boundaries are generally thick hedgerow or fencing. From the Grand Union Canal and from Lower Road the site is easily viewed with no boundaries containing the site.</p> <p>2.5.4 Land at Lower Road represents a sustainable location for growth, close to the centre of Hemel Hempstead and Kings Langley, and can represent an example of cross administrative collaboration to accommodate future needs for housing to sustain both Dacorum Borough and Three Rivers District respectively.</p>	<p>including a material amount of affordable housing provision at 35% of the total provided.</p> <p>CS paragraph 14.32 sets out the affordable housing requirement, identifying that there is an annual need for affordable housing in Dacorum Borough totalling 265 dwellings, less than half the average yearly requirement set out in the EEP.</p>		
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	14.22	14.22	Supporting	Yes	Yes		HCC support the identification that Local Allocations should be planned in line with infrastructure capacity, particularly primary schools. Officers in Hertfordshire Property and elsewhere in HCC, look forward to continuing to work in constructive partnership with officers at DBC to		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are

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													consider issues of site boundaries, phasing and mix as further details are formulated for the Site Allocations DPD.			available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 14.22	14.22	Supporting	Yes	Yes		<p>This comment relates to Paragraphs 14.18- 14.23 which address the proposed housing requirement and distribution.</p> <p>Our client considers that the Pre-Submission Core Strategy identifies an appropriate level of housing for the Borough over the plan period.</p> <p>In order to achieve this, Paragraph 14.19 states that previously developed land will be utilised wherever possible, but that this will not be enough in isolation to</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions</p>

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													maintain a sufficient and steady supply of housing over the lifetime of the plan. Therefore, some greenfield development including appropriate extensions to Hemel Hempstead known as Local Allocations will be required.  This approach is supported as a sustainable, achievable and practical response to housing delivery, which will ensure that the housing requirement can be met.  It is considered vital that the level of housing identified for Hemel Hempstead is delivered in order to meet the needs of the population over the plan period.			relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.
515465	Mr Alan Kemp	Berkhamsted Town Council				Paragraph	14.22	14.22	Objecting	No	No	a) Justified	New development cannot be used to finance existing infrastructure deficits; however, it could reduce existing deficits provided the additional demand created by the local allocation is limited.  Replace with "they can be used to <b>help</b> address local infrastructure deficits".		Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	14.23	14.23	Supporting	Yes	Yes		HCC support the identification that Local Allocations should be planned in line with infrastructure capacity, particularly primary schools. Officers in Hertfordshire Property and elsewhere in HCC, look forward to continuing to work in constructive partnership with officers at DBC to consider issues of site boundaries, phasing and mix as further details are formulated for the Site Allocations DPD.		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core

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																Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraph 14.23	14.23	Supporting	Yes	Yes		<p>This comment relates to Paragraphs 14.18- 14.23 which address the proposed housing requirement and distribution.</p> <p>Our client considers that the Pre-Submission Core Strategy identifies an appropriate level of housing for the Borough over the plan period.</p> <p>In order to achieve this, Paragraph 14.19 states that previously developed land will be utilised wherever possible, but that this will not be enough in isolation to maintain a sufficient and steady supply of housing over the lifetime of the plan. Therefore, some greenfield development including appropriate extensions to Hemel Hempstead known as Local Allocations will be required.</p> <p>This approach is supported as a sustainable, achievable and practical response to housing</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in</p>



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													<p>delivery, which will ensure that the housing requirement can be met.</p> <p>It is considered vital that the level of housing identified for Hemel Hempstead is delivered in order to meet the needs of the population over the plan period.</p>			Public.
491185	Sheila Doyle	Friends of the Earth				New Housing	CS17	Policy CS 17	Objecting	No	No	a) Justified	<p>No housing should be built on greenbelt. The lower option would have enabled all housing to have been built on brownfield sites .</p> <p>We would expect all housing to have renewable technology, and be energy efficient.</p> <p>Empty properties within Dacorum should be looked at first.</p>	<p>No housing to be built on greenbelt</p> <p>All housing to have renewable technology and be energy efficient.</p>	Yes, I wish to participate at the oral examination	prefer personal representation
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				New Housing	CS17	Policy CS 17	Objecting		No	b) Effective	<p>This is in <b>effective</b>, in that it runs contrary to other elements of the Strategy, as listed in our response to 1.4. New housing should only be built on brownfield sites. If the council had gone for the lower option , 7000 houses would all have been built on brownfield sites. Under the higher option 1550 will be built on greenbelt land, leaving the remainder to be built on brownfield sites. It is ridiculous to sacrifice greenbelt land for 1550 homes. plus the infrastructure needed. (See for example our response to 1.10.) We also raise the issue of how many houses are empty in Dacorum., and how many are actually homeless in Dacorum. (See our response to Section 14 header.)</p>	Revise the housing target down to 2010 Public Consultation Option 1 as per our response to 1.4		
610834	Mr Norman Thomas Jones					New Housing	CS17	Policy CS 17	Supporting	Yes	Yes		<p>Although I have concerns about one of the sites given (LA2) as given under 20.6, I feel it is necessary to have the average level of new housing stated thus avoiding a serious under provision of housing</p>		No, I do not wish to participate at the oral examination	

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													locally (leading to higher prices, long distance commuting, potential homelessness). Local allocation LA2 barely affects the larger picture.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				New Housing	POLICY CS 17	Policy CS 17	Objecting	Yes	No	b) Effective	CS17 needs clarification as the wording does not agree with explanations within DBC document "Housing Land Availability Paper July 2011"	Clarrification required.	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning policy that will affect their environment and quality of life.
223914	Mrs Nichola Mills					New Housing	CS17	Policy CS 17	Objecting	No	No	a) Justified	No housing should be built on greenbelt. The lower option would have enabled all housing to have been built on brownfield sites .	If the council had gone for the lower option , 7000 houses would all have been built on brownfield sites. Under the higher option 1550 will be built on greenbelt land, leaving the remainder to be built on brownfield sites.  We must not use greenbelt land.	No, I do not wish to participate at the oral examination	
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	New Housing	CS17	Policy CS 17	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective or Consistent with national policy.  Page 108 - Policy CS17: The Core Strategy proposes insufficient housing to meet projected requirements over the period 2006-2031. The housing figures are unrealistic in allowing for nil migration and rely upon a number of sites which are unlikely to come forward. We have set out in full in a supporting document why we consider the housing provision is inadequate.	The Core Strategy proposes insufficient housing to meet projected requirements over the period 2006-2031 and the provision of housing should be increased in accordance with advice in PPS 3 and PPS 12. We have set out in full in a supporting document why we believe that at least 13,500 dwellings are required (rather than the 10,750 actually proposed).	Yes, I wish to participate at the oral examination	This matter is fundamental to the Core Strategy and to our Clients' interests in land at Nash Mills. The Pre Submission Core Strategy is not justified or effective in terms of housing provision which is fundamental to the Plan as a whole. Overall housing provision is so important to the Plan it will need to be examined orally.
211062		Banner Homes Limited	618743	Mr Les West	Barton Willmore	New Housing	CS17	Policy CS 17	Objecting	Yes	No	b) Effective	Banner Homes considers that neither the overall housing target of 10,750 in policy CS17 nor the uplifted figure based on potential urban capacity of 11,320 in Table 8 is sufficient. In order to address the	An increase in the Borough's housing target to address local housing needs. An effective mechanism to ensure the delivery of	Yes, I wish to participate at the oral examination	In order to be able to provide further written and oral evidence to the Inspector.

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													<p>Borough's housing need it is considered that it would be necessary to increase the Council's overall housing target by 1,334 dwellings to 12,084.</p> <p>Also the strategy in the policy for maintaining housing delivery is not sufficiently robust. This is particularly important given the direction of travel of the Government's draft National Planning Policy Framework which identifies the need to significantly increase the supply of housing in paragraphs 107 to 110.</p> <p>It should also be considered in the context of the Government's recently published 'Laying the Foundations: A Housing Strategy for England' which proposes an increase in supply of new homes.</p> <p>It is considered that this policy is not 'effective'.</p> <p>Please refer to Barton Willmore's accompanying report for further detail.</p>	<p>housing should be incorporated. The current mechanism will not be effective.</p> <p>Please refer to Barton Willmore's accompanying report for further detail.</p>		
211068	Mr Nick Harper	The Crown Estate	210968	Ms Helena Deaville	AMEC	New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	<p>The Crown Estate welcomes DBC's decision to take the option of the higher level of housing growth forward to the submission stage, and also welcomes the reference to the Council expecting to achieve and exceed the level of housing provision set out in Policy CS17.</p> <p>However, it is our view that a higher number than 430 is justified and would make the Plan sound.</p> <p><b>Evidence Base</b></p> <p>The East of England Plan has not yet been revoked. However, the</p>	<p>Given that the latest household projections show more need for new homes than the Pre-Submission Core Strategy makes provision for, the housing provision is unlikely to provide sufficient affordable housing to meet the required need, and in light of emerging National Policy, the level of housing provision should be re-considered and increased significantly.</p> <p>The household projections suggest a need for around 520 dwellings per annum which would provide around 180 affordable</p>	Yes, I wish to participate at the oral examination	The Crown Estate is a significant landowner in the Dacorum area, and considers that its land to the east of Hemel Hempstead could provide a sustainable urban extension to the town, assisting Dacorum to meet its need for housing and to increase the level of affordable

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													<p>housing numbers relating to Dacorum and in particular Hemel Hempstead (this indicated a requirement for over 600 dwellings per annum, including an urban extension, likely to be into St. Albans) were quashed following legal challenge and never replaced, leaving a policy gap at the regional level. Until the National Planning Policy Framework is finalised and published, existing National Policy in the form of PPG3: Housing (June 2011) still applies. Whilst DBC does not have a regional target, the housing numbers that it arrives at should still be transparent and based on reliable up to date information, taking into account evidence set out in paragraph 33 of PPG3</p> <p>including:</p> <p>Evidence of current and future levels of need and demand for housing and affordability levels based upon local and sub-regional evidence of need and demand, the Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.</p> <p>Local and sub-regional evidence of availability of suitable land for housing using SHLAAs and drawing on other relevant information such as the Register of Surplus Public Sector land.</p> <p>The Government's overall ambitions for affordability across the housing market, including the need to improve affordability and increase housing supply.</p>	<p>dwellings per annum. In order to meet the SHMA's estimate of 220 affordable homes per annum, the level of provision would need to be closer to 620/630 dwellings per annum, closer to the level of provision originally provided for in the East of England Plan (before the policy relating to Hemel Hempstead was quashed) which included provision for a sustainable urban extension to the town, most likely to the east on The Crown Estate's land in St. Albans.</p>		<p>housing in the District, making housing in the District more affordable in the longer term. The evidence base in relation to housing provision should be re-considered at the examination to ensure a sustainable future for those living in the District, ensuring that appropriate levels of housing, including affordable housing are provided.</p>

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													<p>A Sustainability Appraisal of the implications, benefits and risks of the development, considering the most sustainable pattern of development.</p> <p>An assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.</p> <p>The Draft NPPF also takes this approach, stating at paragraph 109 that in order to boost the supply of housing, local planning authorities should use an evidence base to ensure that their Plan meets the full requirements for market and affordable housing in the area. Paragraph 14.16 of the Pre-Submission Core Strategy sets out the range of evidence that the Council has considered. One of these considerations is the amount of housing needed to meet forecast household growth in the borough. The latest household projections were published in November 2010. The projections for Dacorum show that from 2008 to 2033 (a similar timescale to the Core Strategy), there is likely to be an increase of 13,000 households</p> <p>from 58,000 in 2008 to 71,000 in 2033, an increase of 22%. This equates to around 520 dwellings per annum, higher than the 430 dwellings per annum proposed in the Presubmission Core Strategy.</p> <p>A key issue for Dacorum is the shortage of affordable housing. 430 dwellings per annum is unlikely to result in sufficient affordable housing being built. Between 2005 and 2010, on average only 98</p>			

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													<p>affordable dwellings were constructed per annum, although in the last three years of this period the figure ranged from 96 to 148 (DBC Annual Monitoring Report 2009/2010). The Dacorum Housing Strategy 2008-2011 identifies that including backlog, new formations, net increases in registered need, the net annual outstanding need is for around 710 new affordable dwellings per annum. 430 dwellings per annum is only likely to achieve around 150 affordable dwellings per annum (based on 35%). The SHMA estimates that the requirement for social housing over the period from 2007 to 2021 is around 220 per annum.</p> <p>Another factor that should be considered in setting levels of housing provision is the level being provided for in adjoining districts. Dacorum is aware that St. Albans is proposing a very low level of housing provision (currently 250 dwellings per annum) and there will therefore be</p> <p>implications for surrounding authorities which may experience greater demand as households are effectively forced into neighbouring authorities from certain authorities where there is very low provision. This is another area where the duty to co-operate issue is relevant, as it should enable co-operation over housing numbers in the absence of strategic guidance.</p> <p>Flexibility of Supply It is noted that windfalls are not included in the housing target as identified in Policy CS17, but are included in the prospective distribution of housing in the first ten years. Paragraph 14.12 of the Core Strategy states</p>			

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													<p>that inclusion of windfalls on top of supply means that there is leeway to exceed the target by up to about 6%. The Draft NPPF advises that supply should include an additional allowance of at least 20 per cent to ensure choice and competition.</p> <p>PPS3 calls on local planning authorities to ensure that performance is within an acceptable range (10 - 20%) when compared with housing land trajectories. In order to better respond to changing circumstances and to provide flexibility as there is no certainty that all sites will be developed, it is considered that further greenfield sites such as that to the east of Hemel</p> <p>Hempstead should be identified.</p> <p><b>Meeting Development Needs</b></p> <p>The emerging national policy context, the draft NPPF sets out the presumption in favour of sustainable development at paragraph 110 and states that this means that Local Plans should be prepared on the basis that objectively assessed development needs should be met, unless</p> <p>the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole. Paragraph 109 of the draft NPPF states that supply should make allowance for at least 20 per cent to ensure choice and</p> <p>competition in the market for land. This document is a material consideration when assessing the soundness of the Core Strategy. Further sites should therefore be</p>			

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													<p>identified in order to provide an allowance of at least 20% to ensure that there is choice and flexibility to meet development needs.</p> <p>Increasing the level of housing provision and providing more strategic/larger sites for housing development would assist the Borough in meeting its needs and in providing appropriate infrastructure to accompany the housing. Bringing forward a number of much smaller sites in different locations is less likely to provide sufficient new infrastructure where it is required.</p>			
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Woolf Bond Planning	New Housing	CS17	Policy CS 17	Objecting	No	No		<p>The National Planning Policy Framework (NPPF) makes it clear at paragraph 109 that in significantly increasing the supply of housing LPAs should meet the full requirements for market and affordable housing (our underlining). This in part, carries forward the requirements set out in PPS3 which states that, when determining the local level of housing provision LPAs are required to take into account evidence of current and future levels of need and demand, set out in Strategic Housing Market Assessments (SHMAs) and other relevant market information such as long term house prices.</p> <p>The above implies the need to plan for a higher annualised strategic housing requirement to be met within Dacorum above the annualised requirement set out in the RSS. As to the need for and identification of strategic sites, we note the reliance placed upon the delivery of 180 dwellings from the Durrants Lane/Shootersway site at Berkhamsted and confirm that the site is deliverable in the early part of the plan period given the ongoing cooperation to development of the</p>		No, I do not wish to participate at the oral examination	



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													site shown by the interested parties.  As to the approach to development the strategic sites are listed in Table 8 and yet, notwithstanding their importance to achieving the Place Visions, they are not identified formally in policy. It is considered that the strategic sites should be identified formally in policy. It is considered that the strategic sites should be identified in upper case policy as an amendment to either Policy CS1 or CS17, or both.			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	It is not sound as it is not Justified, Effective or Consistent with national policy.  Draft Policy CS17, draft Table 8 and draft Table 9 are considered unsound for a number of significant reasons:  <b><u>(1) DBC's borough-wide Housing Target</u></b>  PPS3 states that Local Authorities should deliver "a sufficient quantity of housing taking into account need and demand and seeking to improve choice". The DCLG Practice Guide 3[1&2] sets out the requirement for analysis of past and current housing market trends, including balance  between supply and demand in different housing sectors in addition to consideration of future household estimations.  This is echoed in the Government's NPPF which indicates the importance a presumption in favour of new development which meets housing demand and results in economic growth for an area. It places emphasis on the importance for Authorities to identify a scale and	For the reasons set out above, the following changes are considered necessary in order to make the Core Strategy is sound.  Policy CS17: New Housing  An average of <b>530</b> net additional dwellings will be provided each year (between 2006 and 2031).  The new housing is planned to come forward in phases. Should housing completions fall below 15% of the housing trajectory at any time, and review of the deliverability of planned sites indicates that the housing trajectory is unlikely to be recovered over the next 5 years, the Council will take action to increase the supply of deliverable housing sites <b>through a review mainly of existing Housing Allocations where earlier delivery could be achieved.</b>	Yes, I wish to participate at the oral examination	It is necessary as the above relates to changes to the Core Strategy Plan in relation to future development growth across the borough.

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													<p>mix of housing that the local population is likely to require over the plan period which "meets household and population projections, taking account of migration and demographic change."</p> <p>Further, Annex C of PPS3 adds that Strategic Housing Market Assessments (SHMAs) should "determine how the distribution of need and demand varies across the plan area", consider "demographic trends, and identify the accommodation requirements of specific groups". In essence, future housing development should meet forecasted levels of housing growth of a borough/ district and focus on those areas which have existing and expected market demand i.e. that new homes are built at the right market locations within a local area. PPS3 also indicates that plans should provide certainty in identifying suitable locations for new housing development as part of the wider spatial vision for the local area.</p> <p>It is therefore essential that DBC's housing target for the plan period is justified by a robust evidence base that takes into consideration existing and projected population and household growth.</p> <p>The Pre-Submission Core Strategy consultation document recognises this requirement. It states that the borough's towns cannot sustain themselves unless there is investment and they are allowed to adapt and grow[3], and meet their local housing needs[4]. The consultation document also acknowledges that the choice of housing target has considered "the</p>			

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													<p>amount needed to meet forecast household growth in the borough"[5].</p> <p>However, draft policy CS17 implies a housing target of 10,750 additional dwellings provided between 2006-2031 based on annual development rates. Confusingly, DBC identifies in draft Table 8 a target for providing 11,320 additional dwellings in the plan period which includes windfall allowance. This is inconsistent with the policy target and PPS3.</p> <p>GUI have submitted a Housing Demand and Socio-economic Assessment, November 2011 which assesses in detail the actual housing demand for the borough and Berkhamsted. The calculation is based on the latest household and population projections. It concludes that 13,246 additional dwellings are required within the CS Plan Period to meet the actual housing demand and needs of the borough.</p> <p>The CS's supporting Sustainability Appraisal (September 2011) states that the delivery of 10,750 dwellings to 2031 would "have adverse effects on some environmental objectives" but would "provide a balance between housing provision and planned new job creation". It adds that a higher</p> <p>housing target of 13,450 (based on 2008 ONS projections) would have "adverse effects on many environmental objectives" and "the imbalance between new homes and jobs could create issues relating to an under supply of jobs". It does however acknowledge that this higher growth level</p>			

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													<p>would "better meet natural population growth needs", result in "greater provision of affordable housing" and "help maintain viability of existing services whilst also encouraging the provision of new facilities" (Page E-30, Appendix E: Policy Assessment).</p> <p>The draft policy target figure of 10,750 additional dwellings to be provided to 2031 is therefore significantly under-estimated (by 2,450 additional dwellings borough-wide). No definitive evidence has been put forward to justify this reduction, without which the overall housing target is considered to be fundamentally flawed.</p> <p>On this basis, draft policy CS17 should therefore propose an annual target of some 530 dwellings per annum in order to meet forecasted natural household growth in the borough (13,200 divided by 25 years).</p> <p>The exclusion of windfall provision for the first ten years in the calculation of housing supply policy CS17 is generally supported (in accordance with national policy). However, the reasoning for including this windfall provision in draft Table 8 is ambiguous. For the above reason, the additional 13,246 unit requirement (to 2031) should replace DBC's additional housing requirement figure of 11,320 currently identified.</p> <p><b><u>(2) DBC's Housing Target and Land Allocation at Berkhamsted</u></b></p> <p>The proposed housing target for Berkhamsted in draft Table 8 and</p>			

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												<p>the Strategic Sites and Local Allocations identified in draft Table 9 are not considered to be based on any robust evidence base. DBC's housing evidence does not (1) properly examine locally generated housing needs and demands based on natural population (and household) growth at Berkhamsted and (2) sufficiently assess the identified sites' appropriateness in accordance with PPS3 (PPG2) and other national planning-related criteria.</p> <p>In particular, Berkhamsted, as an important market town, has not been given the opportunity to enhance its function and vitality and its overall contribution to the borough's socio-economic activity by being identified for any form of new strategic development.</p> <p><u>a) Actual Housing Demand and Needs at Berkhamsted</u></p> <p>There is no robust evidence from the Authority to indicate how a target of providing an additional 1,180 dwellings for Berkhamsted (draft Table 8) has been derived.</p> <p>The detailed analysis undertaken in the appended Housing Demand &amp; Socio-Economic Assessment, November 2011, which forms part of GUI's Planning Submission based on the most recent data available, shows that the demography of Berkhamsted is more dynamic than that generally seen in Dacorum.</p> <p>It outlines that this is unlikely to have been taken into account in the various projections produced so far by Dacorum - and as a result there has been a substantial</p>				

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													<p>underestimation of the amount of future new housing likely to be required at Berkhamsted.</p> <p>More specifically, GUI's Housing Demand &amp; Socio-Economic Assessment identifies the need for Berkhamsted and Northchurch to provide 2,871 additional dwellings over the CS period to meet forecast levels of natural population and household growth. This assumption is based on the latest</p> <p>ONS statistical data (2008) which should be applied. In fact DBC has actually acknowledged that this data should be considered but that the borough is instead subject to economic growth and environmental constraints. Meeting future housing demand is the foremost consideration (in national policy) whilst supporting new development at the most sustainable locations. New homes create economic regeneration and in terms of environmental constraints, most of the DBC's settlements are contained by Green Belt and it should be accepted that the housing need is an exceptional position to consider sustainable land release where the needs and demands are across the borough.</p> <p>This figure should be reflected in draft Table 8 of the Pre-Submission Core Strategy.</p> <p>DBC's housing trajectory identifies capacity for 853 dwellings on defined sites with a further 60 dwellings on Local Allocations. An additional 277 dwellings are estimated on undefined sites. This provides for a total of 1,190 additional new homes to be planned for by DBC's calculation, however,</p>			

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													<p>their Table 8 defines a 1,180 requirement. Again, this highlights discrepancies in DBC's assessment of housing demand and need. When set against the actual housing demand requirements set out in GUI's Housing Demand &amp; Socio-Economic Assessment, there is a deficit of 1,691 dwellings (when set against the DBC's planned 1,180 figure) to meet local demand at Berkhamsted over the plan period.</p> <p>GUI's Housing Demand &amp; Socio-Economic Assessment demonstrates that only 41.1% of local housing demand would be met through the current allocation in the Pre-Submission Core Strategy. Not only will this result in a net outward migration of people from Berkhamsted but it will also result</p> <p>in the already high house prices being exacerbated as demand rises. This in turn will result in an uneven impact across the population with first time buyers and all local income groups being largely excluded from the town.</p> <p>Restricting the expansion of Berkhamsted, as the second largest settlement (in terms of population size and critical mass of services and facilities) will result in Dacorum not fully realising its future potential in terms of housing and economic growth.</p> <p>There is no doubt that the objective of meeting local housing demand must be balanced against competing objectives in the Core Strategy. These objectives include limiting the impact on the Green Belt and landscape designations, both of which constrain much of Berkhamsted's boundary.</p>			

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													<p>Other assessments on these issues and other environmental constraints that accompany this submission show that the land south of Berkhamsted can be released from the Green Belt without a significant impact on the integrity of the designation or the environment. In the fact, the proposals</p> <p>aim to achieve a number of CS vision objectives and commonplace strategies and objectives to include those more specifically concerning Berkhamsted.</p> <p>Whilst the concept is currently at a very initial stage, it is anticipated that it will have a development capacity target of some 800 units over the early part of the Core Strategy period. This will increase supply to 1,990 dwellings. Whilst this does not meet the total local need of 2,871 dwellings, it does substantially improve the situation from 41.1% provision to 69.3%.</p> <p>The remaining need for 881 dwellings is unlikely to be met within the town without a review of employment land or expansion onto significantly more sensitive greenfield land, neither of which are recommended. Instead this demand will need to be met elsewhere in the borough, most likely Hemel Hempstead. It is through this mechanism that focusing development on Hemel Hempstead can be undertaken sustainably.</p> <p>In conclusion, DBC has fundamentally underestimated the future housing needs and demands for the town of Berkhamsted. This makes the CS Plan unsound without amendment to draft Table 8 (as</p>			



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													<p>recommended below).</p> <p>b) Land to South of Berkhamsted is <u>considered the most sustainable and suitable location at the edge of the town to assist in accommodating some of the town's future housing demands and needs.</u></p> <p>Berkhamsted has a tightly defined settlement boundary and a relatively dense urban form which limits the opportunity for new residential development within the town. For example, Dacorum's Strategic Housing Land Availability Assessment (SHLAA, October 2008) identifies that, of the 109 identified urban housing sites within the existing housing settlement boundary of Berkhamsted, only 28 sites were deemed suitable by the Council which gives a general impression of the limited urban potential.</p> <p>Notwithstanding the town's constrained urban potential, Berkhamsted could have the ability to accommodate significant future housing growth to assist the borough in meeting its future housing requirements whilst enhancing the town's status (in a complementary role to Hemel Hempstead) and investment potential.</p> <p>On this basis, the Council will need to consider the release of Green Belt and greenfield land around Berkhamsted to accommodate housing growth in the future.</p> <p><i>Alternative Growth Locations</i></p> <p>Green Belt land to the north, west and east of Berkhamsted is constrained by AONB and other</p>			

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													<p>environmental designations which potentially restrict these areas in accommodating new strategic development around the town.</p> <p>GUI's Sustainability Appraisal Review (prepared by Savills, dated November 2011) which also supports GUI's Planning Submission shows that this site performs considerably better than other potential directions of growth to meet the housing demands of the town.</p> <p>The review undertakes a critique of the alternative Green Belt, greenfield locations around the town as part of a sustainability matrix assessment (using DBC's own SA objectives). It concludes that through this analysis, the southern location is the most sustainable location for new development in order to meet the town's future housing demands and needs.</p> <p>GUI's SA review also considers other much smaller sites identified by landowners and the Council as Strategic Sites and Local Allocations in terms of the sustainability. An assessment of these sites alongside a suggested ranking is found at Appendix 1 of the SA Review Document.</p> <p>Land South of Berkhamsted also performs well when benchmarked against the two larger proposed greenfield "Local Allocations" in Hemel Hempstead. It is acknowledged that Hemel Hempstead is the main focus for future development growth although some of the strategic sites and "Local Allocations" at the town could be questioned in terms of their</p>			

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													<p>overall development capacities.</p> <p>However, the suitability of development proposals at Land South of Berkhamsted compared against sites at Hemel Hempstead indicates that the site could have a positive role in complementing future development growth at Hemel Hempstead and could contribute not only to the town's local housing needs but also to the wider parts of the borough.</p> <p>Consolidating future development at Land South of Berkhamsted should also avoid the need to release Green Belt, greenfield sites at smaller, more constrained settlements to include smaller market towns such as Tring and the other villages. These smaller settlements are unlikely to be able to sustain strategic development growth by the nature of their more limited existing services, facilities and retail provision. This strategic development approach would also avoid town cramming more generally within the town.</p> <p><i>Land South of Berkhamsted</i></p> <p>DBC's Alternative Site Assessment (2010) correctly recognises in relation to Land South of Berkhamsted that "Berkhamsted continues to command high house prices locally and collectively the land should prove attractive to the market" and that "it is of a scale that should be able to meet demands for associated infrastructure and affordable housing". It further adds that "given the scale of the land there is significant scope to secure other non residential uses, particularly open/leisure space. While at a distance from the town</p>			

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													<p>centre and employment areas, it is of a scale that could contribute towards improved public transport (community bus hub)" and "there are no fundamental constraints to prevent the sites coming forward if allocated for housing."</p> <p>However, the Officers' Conclusion states that "the scale of proposal is clearly contrary to national Green Belt policies and beyond that needed to meet the predicted housing growth of Berkhamsted to 2031. It would have a major impact on the character and setting of the town, and lead to</p> <p>pressure to develop open countryside southwards towards the A41. While the site has the potential to deliver new community facilities, improve public transport, and contribute towards meeting deficits in open/leisure space, it would also put significant pressure on existing infrastructure such as roads and schooling. Smaller parcels in theory could be considered, but these also prove problematic in respect of their poor relationship to existing housing, proximity to the A41, local impact on open countryside, and poor direct access on to local roads. These sites proved very unpopular with local residents during the consultation on the Site Allocations DPD during late 2008."</p> <p>As mentioned above and as referred to in GUI's Housing Demand &amp; Socio-Economic Assessment (November 2011) which supports these planning representations, the Officers' Conclusion is misinformed in terms of the development being "beyond that needed to meet predicted housing</p>			

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													<p>growth at Berkhamsted to 2031."</p> <p>There is a clear need for strategic new development at the town. It has been demonstrated that Land South of Berkhamsted is the most sustainable and suitable development location. To the south of the town there is existing education and recreational development and DBC has identified Ashlyns School and the BFI as Major Developed Sites (MDS) in the Green Belt - all of which starts to set a precedent for further new development up to the built boundary of the town, the A41.</p> <p>A Concept Plan has been prepared in connection with the Development Proposals and various technical assessments have been undertaken to underpin and support this Concept. The Concept Plan and the technical assessments are found at GUI's submitted Planning Document forming part of their evidence base. This document also appends a Housing and Infrastructure Delivery Trajectory which demonstrates the delivery of the new development in a viable and sustainable way taking into account associated infrastructure costs amongst other factors.</p> <p>The development proposals at Land South of Berkhamsted are associated with a proposed local package of socio-economic and environmental benefits to the town (and the wider part of the borough).</p> <p><i>Infrastructure Benefits</i></p> <p>An extensive amount of technical work has already been undertaken to support the principle of new development at Land at South</p>			

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													<p>Berkhamsted and which has been shared with DBC, Hertfordshire County Council (HCC) and other key stakeholders. A Concept Plan forms the development</p> <p>proposals which has importantly been underpinned by various technical assessments to include transportation, environmental and landscape, ecology, heritage and visual impact, and a housing and infrastructure delivery trajectory (HIDT) - all of which form part of GUI's Planning Document in response to DBC's Pre-Submission CS.</p> <p>A comprehensive community engagement programme has also ensured that the Concept Plan is informed by, and meets the needs of, local residents and their families, stakeholders and interest groups. This community consultation and engagement process was managed by GUI and a report on the outcomes and how the Concept Plan has responded to concerns is outlined in the SCI.</p> <p>The new development results in a package of significant socio-economic and environmental improvements including: the provision of a link road and bus loop to serve the existing town and new residents; a local village centre with supporting community / leisure facilities; open green space; allotments and community orchards; enhanced primary education provision; the creation of local employment opportunities; the provision of wider rural links; and overall town centre regeneration and improvement to local facilities as a result of increased spending</p>			

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													<p>power.</p> <p>This has resulted in a Concept Plan which represents a bespoke vision for a new neighbourhood to the south of the town, building on the unique opportunities inherent in these development sites. A holistic design approach has ensured transport, landscape, sustainability and social infrastructure are integrated in a way that continues the town's unique market town character and creates a neighbourhood with a real sense of place.</p> <p>The resulting 770 unit scheme represents a good planning, design and sustainability response to the site. GUI asks DBC to consider an allocation for some 800 units as a development capacity target for the site and subject to a detailed masterplan at the later stages of the development</p> <p>process.</p> <p>The Planning Document and appending technical assessments which form part of GUI's submission examines these benefits in detail.</p> <p><i>The Local Issues</i></p> <p>A consultation event took place (in late 2008) to explore Berkhamsted's key issues. The Place Workshop for Berkhamsted took place in September 2008. Attendees included Councillors, local businesses and residents. The key messages from the discussions at the Workshop were outlined</p> <p>in the Council's "Berkhamsted Place Workshop Report" (October 2008) and were considered positive in</p>			

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													<p>relation to potential housing development at parts of the land to the south of Berkhamsted. More importantly, the majority of the land to the south of Berkhamsted was outlined, at the time, as being "suitable" for housing (as per Figure 1 of the workshop report).</p> <p>In particular, stakeholder discussion at this workshop included consideration towards outward expansion of Berkhamsted stating that "the A41 bypass forms a new 'natural' southern boundary for the town" and more specifically the "area between Kingshill Way/ Shootersway therefore</p> <p>presents itself as an easy place for development, due to fields, copses and general areas being 'trapped' by the bypass and other boundaries." More general aspirations in relation to the future of Berkhamsted were discussed at the workshop which included the need for improvement of social and transport infrastructure in and around Berkhamsted and the provision of more affordable housing. Land to the south of Berkhamsted offers a solution to meet these above local objectives.</p> <p>GUI undertook a community engagement process during this year (2011) and the Concept Plan aimed to address many of the local community's concerns. Details are found at the Planning Document (at Appendix 8).</p> <p>It is acknowledged that the local community are not supporting the Proposals. However, DBC also needs to decide, beyond the political pressures to be conservative in growth, that future</p>			



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													<p>housing needs and demands for the town will only benefit the community's future generation's housing needs and demands if new development is allowed to take place. This will mean that the younger generations of the existing community will be able to afford to stay in their home town and in turn retain and enhance the town's function and vitality - one of the key strategic and local objectives for the town within the CS Plan.</p> <p><i>Concluding Commentary</i></p> <p>All of the above evidence illustrates that Land South of Berkhamsted is considered the most logical and sustainable development option at the town in terms of PPS2, PPS3 and other national planning-related criteria and guidance to include the NPPF. It will also ensure the delivery of a</p> <p>package of local social and transportation infrastructure benefits which are intended to significantly improve the long term functioning and vitality of the town. These aspects are considered to respond to the comments identified in the Officers' Conclusion in DBC's Alternative Site Assessment (2010) as well as positively addressing the "Strategic Objectives" and "Common Local Objectives" identified in the CS Plan.</p> <p><b>Conclusions on soundness of draft Policy CS17, draft Table 8 and draft Table 9</b></p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are not justified on the basis that the housing targets on which they are based are not supported by a robust and credible</p>			

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													<p>evidence base nor are they effective as their approach would not deliver the quantum or distribution of housing needed in the Borough.</p> <p>Draft Policy CS17, draft Table 8 and draft Table 9 are not consistent with national policy because they are based on housing targets which do not sufficiently meet local housing needs and natural household and population growth projections.</p> <p>By identifying the actual projected level of housing growth required borough wide and at Berkhamsted, and further by identifying Land South of Berkhamsted as a Housing Allocation for development purposes, the strategic and local objectives of the CS Plan will be achieved whilst also meeting key objectives contained in PPS1, PPG2, PPS3 and the NPPF.</p> <p><b>Footnotes:</b></p> <p>1. DCLG. May 2007. Housing Market Information Advice Note.</p> <p>2. DCLG. August 2007. Strategic Housing Market Assessments Practical Guide.</p> <p>3. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 8.7.</p> <p>4. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 1.13.</p> <p>5. Dacorum Borough Council. October 2011. Pre-Submission Core Strategy, Paragraph 14.16.</p>			
498429	Steve Baker	CPRE - The Hertfordshire Society				New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Consistent with national	No changes other than set out above are necessary to the Policy, but the Delivery Mechanisms	Yes, I wish to participate	To ensure that the Inspector's Examination is

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													<p>policy.</p> <p>'430' in the first sentence of the Policy should be changed to '393', and the monitoring targets after the Policy also changed accordingly.</p> <p>The proposed target of 10,750 new homes is excessive and should be reduced to the level of Option 1 in the Draft Core Strategy (9,835) supported by CPRE Hertfordshire. Although this lower level of provision is only 37 dwellings per year lower than the number proposed by the Council, it avoids the fundamental policy change of removing land from the Green Belt through site allocations. CPRE Hertfordshire does not consider the higher level of housing is justified when seeking to meet local need and demand sufficient to meet the Challenges set out in Section 4 of the Core Strategy.</p>	<p>listed should include 'implementation through a Development Management DPD'.</p>	<p>at the oral examination</p>	<p>fully informed of the Planning Issues of concern to CPRE Hertfordshire.</p>
502504		Trustees of Piers Williams	502501	Mr Stuart Williamson	AMEC	New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>We support the delivery of 430 dwellings per annum as a <b>minimum</b> rate of growth up to 2031.</p> <p>We feel Policy CS17 is not consistent with national policy and we therefore make the following recommendations in order for the plan to be found sound:</p> <p>Allocate additional land in lieu of the windfall allowance. Guidance contained in PPS3, paragraph 59, specifically states that windfall allowances should not be made in the first 10 years of land supply, to ensure a robust and continuous supply of land. There can be no certainty of these windfall sites</p>	<p>Evidence, including latest household projections and affordable housing supply data show more need for new homes than the Pre-Submission Core Strategy makes provision for. Therefore, the assessment of housing needs and the emphasis of the NPPF of maintaining and increasing the level of supply, suggest the need to consider higher levels of housing growth. To better respond to housing needs and maintain a robust and flexible supply of housing land, in line with the above guidance, we recommend allocating further Greenfield sites to ensure the successful delivery of the Core Strategy and deliver sustainable communities.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To expand on the points raised in these submissions and assist in the EiP process.</p>

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													<p>coming forward. To provide flexibility for such sites not coming forward., the Council will need to identify additional supply. This would be wholly consistent with paragraph 55 of PPS3.</p> <p><b>Maintain a flexible supply of housing land.</b></p> <p>Whilst Policy CS17 states that should housing completions fall below 15% of the housing trajectory the Council would then take action, this approach is not wholly in line with national guidance. Furthermore, whilst table 8 sets out a prospective distribution slightly greater than the target set in Policy CS17, this is below the 10-20% prescribed in national policy.</p> <p>Local authorities are encouraged to consider the implications of different levels of development taking place either within or beyond the core strategy period (PPS12, paragraphs 4.14-15). Through the core strategy, LPAs are also required to show what alternative strategies have been prepared to handle uncertainties and what would trigger their use (PPS12 paragraph 4.46).</p> <p><b>Increasing housing supply to assist in delivery and meeting housing needs</b></p> <p>The Draft National Planning Policy Framework (NPPF) outlines a number of principles of sustainable development to be achieved in Local Plans. The projections for Dacorum show that from 2008 to 2033, there is likely to be an increase of 13,000 households. This equates to around 520 dwellings per annum, higher than the 430 dwellings per annum proposed in</p>			

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													<p>Core Strategy Policy CS17. In terms of affordable housing, the Dacorum Housing Strategy 2008-2011 identifies that the net annual outstanding need is for around 710 new affordable dwellings per annum.</p> <p>Therefore, the assessment of housing needs and the emphasis of the NPPF of maintaining and increasing the level of supply, suggest the need to consider higher levels of housing growth.</p> <p>Our client's land at Station Road, Tring could be brought forward to meet the immediate LDF requirements. Should the Council require more land should other sites fail to delivery, it could be brought forward at any time to assist in maintaining a deliverable supply of housing land in line with PPS3 and the emphasis of the Draft National Planning Policy Framework.</p>			
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Boyer Planning	New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>Housing provision is inadequate to meet identified requirements in the Borough based on the range of projections considered in accordance with national policy and the vision and objectives of the Core Strategy- see Section Three of Statement.</p> <p>The second paragraph is too restrictive and will operate against the effective and flexible delivery of housing in accordance with national policy and the vision and objectives of the Core Strategy - see Section Six of Statement.</p>	<p>Amend the first paragraph of Policy CS17 to read:</p> <p><b>"An average of 540 net additional dwellings will be provided each year (between 2006 and 2031)."</b></p> <p>Delete second paragraph of Policy CS17.</p>	Yes, I wish to participate at the oral examination	Significant issue relating to housing provision spatial strategy, Hemel Hempstead Place Strategy.
611549	Ms	Three Rivers				New Housing	CS17	Policy CS 17	Supporting	Yes	Yes		The policy includes a target for an average of 430net additional			

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	J Bowyer	District Council											<p>dwelling to be provided, and while paragraph 14.16 lists the factors that have informed this target, we have not been able to find any information, either in the Core Strategy or in background evidence, to set out how this specific target was arrived at. This would be very helpful to understand the balance between the different factors and how these have been taken into account in this target.</p>			
611657	Messrs M&D Gardener		611650	Mr John Heginbotham	Stimpsons	New Housing	CS17	Policy CS 17	Supporting	Yes	Yes		As Representation on behalf of Taylor Wimpey by Martin Friend	As Representation on behalf of Taylor Wimpey by Martin Friend	Yes, I wish to participate at the oral examination	Our client's land is a significant component of LA3
617777	Maggie Campbell		617775	Mr James Pitt	Gleeson Strategic Land	New Housing	CS17	Policy CS 17	Objecting	Yes	No		<p>Consider core strategy unsound as it is not justified, effective and consistent with national policy.</p> <p>The first objection is that the proposed housing provision of 430 dwellings per year is unsound since it fails to deliver the projected level of household need set out in the national 2008 based household projections. Therefore, we believe the decision not to meet these household projections in full is not justified and will mean the policy will not be effective in meeting the demand for housing in Dacorum Borough.</p> <p>In addition to providing insufficient new housing to meet projected needs, we believe the proposed provision 430 dwellings per year is insufficient to sustain the local economy and achieve a net gain of 10,000 jobs (2006-26) as set out in Policy CS14. The combination of demographic trends towards an ageing population and a reducing</p>	<p>In order to make the policy sound, the housing provision should be increased to around 13,000 net new dwellings (2006 - 31). This would reflect the best and most up to date evidence available, better meet housing needs and deliver a larger workforce to achieve the economic aspirations of the plan.</p> <p>The revised policy would read</p> <p>"An average of 520 net additional dwellings will be provided each year (between 2006 and 2031). The supply of housing land will be monitored to ensure the availability at all times of a five year supply of deliverable and suitable sites. Existing housing land and dwellings will normally be retained".</p>	No, I do not wish to participate at the oral examination	

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													<p>household size (see paragraph 14.5) mean that the number of economically active people per 1000 population will fall sharply over the next 25 years. In this context an additional 10,750 new homes is unlikely to support an increase of 10,000 jobs.</p> <p>The effect of the proposed low welling provision is that either economic growth will be frustrated or the jobs will be filled by an increased level of in commuting. The latter outcome would not accord with the sustainable objectives of the Core Strategy.</p> <p>The second objection to this policy is that the review mechanism to increase the supply of housing land is too long winded and inflexible. A better approach would be to state that tyhe housing land supply will continually monitored to ensure the availability of a five year supply of deliverable and suitable sites at all times.</p>			
620224	Mr Stephen Harris	Emery Planning Partnership				New Housing	CS17	Policy CS 17	Objecting	No	No	c) Consistent with national policy	<p>With the intended revocation of the RSS, the Council has rightly progressed with determining its own housing requirement. There is a range of advice to guide local planning authorities on establishing the right level of housing for their area as set out below.</p> <p><b>Policy Context</b></p> <p>The starting point to assess the housing requirement is paragraph 33 of PPS3 which states that the following evidence should be used.</p> <p>Local and sub-regional evidence of need and demand, set out in Strategic Housing Market</p>	Yes, I wish to participate at the oral examination		

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													<p>Assessments and other relevant market information such as long term house prices.</p> <p>Advice from the National Housing and Planning Advice Unit (NHPAU) on the impact of the proposals for affordability in the region.</p> <p>The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.</p> <p>Paragraph 28 of the draft National Planning Policy Framework (dNPPF) states:</p> <p>"Local planning authorities should have a clear understanding of housing requirements in their area. They should:</p> <p>prepare a Strategic Housing Market Assessment to assess their full housing requirements, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to require over the plan period which:</p> <p>meets household and population projections taking</p>			



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													<p>accountof migration and demographic change</p> <p>addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as families with children, older people, disabled people, service families and people wishing to build their own homes); and</p> <p>caters for housing demand and the scale of housing supply necessary to meet this demand</p> <p>prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified requirement for housing over the plan period."</p> <p>The draft Core Strategy consultation (December 2010) proposed two options for the housing requirement for the period 2006 to 2031 which were:</p> <p>Option 1 - an annual average requirement of 370 dwellings</p> <p>Option 2 - an annual average requirement of 430</p>			

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													<p>dwelling</p> <p>Policy CS17 of the pre-submission Core Strategy confirms that option 2 has been pursued.</p> <p>This draft policy states that there will be an average of 430 dwellings delivered in the borough between 2006 and 2031.</p> <p>In light of the above guidance we assess whether this requirement is correct and sound.</p> <p>To do so we assess the following evidence:</p> <p style="padding-left: 40px;">Strategic Housing Market Assessment (SHMA); Affordable Housing Need; and, Household Projections.</p> <p>We first assess the SHMA.</p> <p><b>Strategic Housing Market Assessment (April 2010)</b></p> <p>The requirements in the SHMA are set out in paragraph 14.32 of the Core Strategy. It states:</p> <p>"The Strategic Housing Market Assessment estimated that there will be a significant requirement for social rented housing in Dacorum between 2007 and 2021 (3,100 homes) to achieve a balanced housing supply by 2021. This represents nearly 40% of the housing requirement of 7,800 that the SHMA estimated for all homes over the same period. No specific requirement was identified for intermediate housing. The full</p>			

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													<p>affordable housing requirement over the plan period (2006-2031) would be around 5,300 homes."</p> <p>Therefore the annual requirement identified in the SHMA for Dacorum would be 557 dwellings per annum. For the proposed plan period this would equate to a total requirement of 13,925 dwellings. Policy CS17 of the pre-submission Core Strategy sets out a requirement substantially below this.</p> <p><b>Affordable Housing Need</b></p> <p>It should be noted that the SHMA did not identify an intermediate housing requirement. As is noted in paragraph 14.32, the affordable housing need in the Borough is 5,300 dwellings. To deliver this level of affordable housing at a 35% rate of all development, a housing requirement of 15,200 dwellings would be required. It is therefore of note that paragraph 14.32 states:</p> <p>"While this level of provision is unlikely to be deliverable, the aim should still be to maximise the provision of affordable housing in the borough. A target of 35% is realistic and achievable, when compared with past achievement, economic conditions and costs associated with new building".</p> <p>We question why the Council states that this level of provision is unlikely to be deliverable as there are the potential sites within Dacorum to meet this requirement. The previously published SHLAA in October 2008 concluded that there was potential for 23,115 dwellings in Dacorum. Therefore there is no reason why the level of residential development required to meet the</p>			

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													<p>affordable housing needs of the area cannot be delivered.</p> <p><b>Household Projections</b></p> <p>The Government publishes household projections for each of the local authority areas in England on a regular basis. The most recent household projections to 2033 for England were released on 26th November 2010. These figures have not however been incorporated into the pre-submission Core Strategy despite their being an increase from those used in the previous draft. The table below sets out the results for Dacorum from the last three datasets.</p> <p>The key conclusion is that the latest figures demonstrate an increased requirement for Dacorum. As stated above, policy CS17 of the pre-submission Core Strategy is based on option 2 of the draft Core Strategy (December 2010). Option 2 was based on the older lower figures and does not take into account the increase in households set out in the latest projections.</p> <p><b>Conclusions</b></p> <p>This section has assessed a number of scenarios to assess the housing requirement for Dacorum based upon the various source documents or data. For ease of reference these are set out in Table 2.</p> <p>Table 2 demonstrates that the housing requirement being pursued by the Council in policy CS17 in this pre-submission Core Strategy is substantially below the requirements in the evidence base</p>			

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													(SHMA) and the latest household projections. The only conclusion is that the Council has artificially reduced the potential requirement contrary to the evidence base. Therefore the Core Strategy is not sound and should be revised accordingly.  We consider the requirement should be at least 14,000 as this accords with:  SHMA (April 2010); The affordable housing need; and, The 2008 based Household projections (November 2010).			
211658	Ms Victoria Lindsey	Piccotts End Residents Association				New Housing	CS 17	Policy CS 17	Objecting	Yes	No	c) Consistent with national policy			Yes, I wish to participate at the oral examination	Environment Issues
211660	Mr Garrick Stevens	Berkhamsted Town Council				New Housing	CS 17	Policy CS 17	Objecting	Yes	No		Under existing legislation, the Planning Authority has no power or ability to cause developers to build homes - open market or otherwise. Unless the Borough takes on the commissioning role, as a principal, it will be unable to make a significant change to the trajectory of delivery. This is a fundamental weakness in this framework.		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.
398370	Mr Matt Richardson	Gleeson Strategic Land	621389	Mr Bob Sellwood	Sellwood Planning	New Housing	CS17	Policy CS 17	Objecting	Yes	No		The proposed housing provision of 430 dwellings per year in unsound since it fails to deliver the projected level of household need in the national 2008 based household projections. The decision not to meet the household projections in full is not justified and hence the policy will not be effective in meeting the demand for housing in	In order to make the policy sound, the housing provision should be increased to around 13,000 net new dwellings (2006-31). This would reflect the best and meet up to date evidence available, better meet housing needs and deliver a larger workforce to achieve the economic aspirations of the plan.	Yes, I wish to participate at the oral examination	

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													<p>Dacorum Borough.</p> <p>In addition to providing insufficient new housing to meet projected needs, the proposed provision of 430 dwellings per year is insufficient to sustain the local economy and achieve a net gain of 10,000 jobs (2006-26) as set out in Policy CS14. The combination of demographic trends towards an ageing population and reducing household size (see paragraph 14.5) mean that the number of economically active people per 1000 population will fall sharply over the next 25 years. In this context an additional 10,750 new homes is unlikely to support an increase of 10,000 jobs.</p> <p>The effect of the proposed low dwelling provision is that either economic growth will be frustrated or the jobs will be filled by an increased level of in commuting. The latter outcome would not accord with the sustainable objectives of the Core Strategy.</p> <p>The second objection to this policy is that the review mechanism to increase the supply of housing land is too long winded and inflexible. A better approach would be to state that the housing land supply will be continually monitored to ensure the availability of a five year supply of deliverable and suitable sites at all times.</p>	The revised policy would read "An average of 520 new additional dwellings will be provided each year (between 2006 and 2031). The supply of housing land will be monitored to ensure the availability at all times of five Existing housing land and dwellings will normally be retained".		
471307	George Edkins	Hightown Praetorian & Churches HA				New Housing	CS 17	Policy CS 17	Supporting	Yes	Yes		We fully support the policy of 430 net additional dwellings per year as this is the best way of delivering the affordable homes that the Borough so clearly needs, and it can be achieved without harm to the environment.		No, I do not wish to participate at the oral examination	
494131	Mr	CALA Homes				New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent	Replace "430" with "500".	Yes, I wish to	CALA Homes has a controlling

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	Michael Emmett											d	<p>with national policy.</p> <p>Part A of the document establishes the context from which the Strategy is developed in Part B. This analysis is supported; the Challenges (section 4) are correctly identified and carefully assessed, the Vision (section 5) is commendable and the Strategic Objectives (section 6) are appropriate. However, these elements are contradicted, and severely undermined, by the insufficient provision for housing, set out in subsequent parts of the strategy.</p> <p>Specifically, the Council will be unable to meet its stated aims of seeking balanced and sustainable growth and strong, inclusive communities (Challenges 1 and 4 respectively) by the level of housing provision established in Policy CS17.</p> <p>Similarly, achieving the strategic objectives set out in paragraph 6.2, notably the promotion of sustainable and healthy communities (objective 1), social inclusion and cohesiveness (objective 3) and the provision of a mix of new homes to meet the needs of the population (objective 10) will be undermined rather than advanced by insufficient housing provision.</p> <p>Again, the Community Strategy's desire to meet housing need (paragraph 7.3) will not be fulfilled.</p> <p>Policy CS17 sets out the proposed provision of new housing, this being 430 dwellings per annum (equating to 10,750 over the 25 year plan period). This is significantly below the 12,400 homes required to maintain nil net migration across the</p>	<p>Delete second paragraph;</p> <p>Or, if it is to be retained, reword to provide greater clarity as to its relationship to Policy CS3 and what specific action will be taken to increase housing supply.</p>	<p>participate at the oral examination</p>	<p>interest in the Icknield Way Tring Local Allocation and as such has an important role to play in delivering a key element of the Core Strategy.</p>

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													<p>Borough and massively below the 600 dwellings per annum required by the East of England Plan prior to the judicial review that ultimately quashed this figure.</p> <p>Consequently, the Core Strategy demonstrably fails to satisfactorily plan to meet the Borough's housing needs; it will not meet locally arising needs let alone contribute to meeting the sub-regional needs of the wider area and indeed is deliberately and explicitly planning for net outward migration. The impact on both local communities and those in neighbouring authorities will therefore be considerable.</p> <p>Such under-provision is all the more concerning given Hemel Hempstead's traditional role as a new town in providing for wider housing needs. Moreover, when one looks at the emerging housing targets of adjoining authorities, a picture of gross cumulative under-provision emerges. Taking the south western Hertfordshire authorities of Dacorum, St Albans, Hertsmere, Watford and Three Rivers as a whole, aggregate annual provision in their respective Core Strategies is 1357 dwellings, barely 60% of the corresponding 2008-based ONS household projection figure for the same area of 2240 pa. This is compounded yet further by Aylesbury Vale's outright rejection of any sub-regional growth role. Importantly, there is no evidence that these authorities, including Dacorum, have liaised with each other, as is now required under the duty to co-operate as set out in both the Localism Act and draft NPPF to ensure that cross administrative boundary issues are properly</p>			



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													<p>addressed.</p> <p>While the Core Strategy refers, at paragraph 14.16, to its balanced judgement in determining its housing target it is considered that this has given too much weight to political pressure to minimise new development and in doing so its proposed figure of 430 dpa ignores, or pays insufficient regards to the evidence base available, notably ONS population and household projections and the Council's own SHMA.</p> <p>It is considered that Dacorum should, as a minimum, meet its own housing needs amounting to 12,400 homes over the plan period. Arguably, it should also meet a proportion of sub-regional growth, as was intended by the East of England Plan. Policy CS17 should be amended accordingly to incorporate an annual housing requirement of at least 500 dwellings.</p> <p>The second element of this policy relates to the monitoring of completions and if necessary reviewing sources of land supply. As was noted in the context of Policy CS3, which seeks to phase the release of local allocations, the relationship between the two policies is unclear. It is noted, for example, that in the text below Policy CS17 a number of action points are listed under the sub-heading "Delivery will be achieved by:", yet none of these refer either to the release of local allocations or the identification of additional sites over and above those already included in the Core Strategy.</p> <p>Moreover, as it would appear that</p>			

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													completions from 2006 to 2010 were already running at less than 85% of the 430 dpa target the Council should already be "taking action" to increase the supply of deliverable housing sites. This adds further weight to the contention that Policy CS3, as currently worded and without greater planned housing provision, is wholly unjustified.			
4943 10	Mr Elliot Jones	Barratt Strategic	4942 84	Mr Elliot Jones	Rapleys LLP	New Housing	CS 17	Policy CS 17	Supporting	Yes	Yes		<p>This comment relates to Policy CS17: New Housing.</p> <p>Our client supports the proposed figure of 430 net additional dwellings per year between 2006 and 203.</p> <p>In relation to the timing of housing delivery, a phased approach is proposed in the Pre-Submission Draft. However, the Council must ensure that there is a mechanism in place to allow later phased development to be realised earlier should early phased developments not come forward or be delayed.</p> <p>The policy notes that, should housing completions fall below 15% of the housing trajectory at any time and a review of the housing trajectory shows that it is unlikely to be recovered over the next 5 years, the Council will take action to increase the supply of deliverable housing sites, presumably through the earlier release of sites phased for later development. This approach is supported, but it is suggested that further information is provided to justify the rationale for the 15% trigger, or, at least provide more detail justification and clarification in the Site Allocations DPD.</p>			Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.
4948 47		Trustees of Drayton	6267 80		Cole Flatt & Partners	New Housing	CS17	Policy CS 17	Objecting	Yes	No		Housing Provision (policy CS17)	Refer to response to question 4 above	No, I do not wish to	

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		Beauchamp Parochial Charities											<p>Policy CS17 sets out the proposed provision of new housing, this being 430 dwellings per annum (equating to 10,750 over the 25 year plan period). This is significantly below the 12,400 homes required to maintain nil net migration across the Borough and massively below the 600 dwellings per annum required by the East of England Plan prior to the judicial review that ultimately quashed this figure.</p> <p>Consequently, the CS demonstrated fails to satisfactorily plan to meet the Borough's housing needs; it will not meet locally arising needs to let alone contribute to meeting the sub-regional needs of the wider area and indeed id deliberately and explicitly planning for that net outward migration.</p> <p>There is no evidence that adjoining Authorities, including Dacorum and Aylesbury Vale, have liaised with each other, as is now required under the duty to co-operate as set out in both the Localism Act and the draft NPPF to ensure that cross administrative boundary issues are properly addressed. As an example AVDC has just granted consent for the ARLA Foods Applications at College Road, North on the A41 Aston Clinton by-pass about 2.5 miles from the western side of Tring for 450,000sw ft of B2/B8 uses with projected employment of up to 1230 people. (Applications 11/00962/AOP and 11/00964/AOP).</p> <p>The CS refers, at paragraph 14.16, to its balanced judgement in determining its housing target, it is considered that this has given too much weight to political pressure to minimise new development and in doing so its proposed figure of 430</p>		participate at the oral examination	

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													<p>dwelling per annum ignores, or at least pays insufficient regard to the evidence base available, notably ONS population and household projections and the Council's own SHMA.</p> <p>Dacorum should, as a minimum meet its own housing needs amounting to 12,400 homes over the plan period. Arguably, it should also meet a proportion of sub-regional growth, as was intended by the East of England Plan. Policy CS17 should be amended accordingly to incorporate an annual housing requirement of at least 500 dwellings.</p> <p>The second element of this policy relates to the monitoring of completions and if necessary reviewing sources of land supply. As was noted in the context of Policy CS3, which seeks to phase the release of local allocations, the relationship between the two policies is unclear. It is noted for example, that in the text below Policy CS17 a number of action points are listed under the sub-heading "Delivery will be achieved by", yet none of these refer either to the release of local allocations or the identification of additional sites over and above those already included in the CS.</p> <p>Moreover, as it would appear that the completions from 2006 to 2010 were already running at less than 85% of the 430 dwellings per annum target the Council should already be "taking action" to increase the supply of deliverable housing sites. This adds further weight to the contention that Policy CS3, as currently worded and without greater planned housing</p>			

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													provision, is wholly unjustified.			
625438	Mr Chris Ball		625439	Mr Adam Halford	Bidwells	New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>We object to Policy CS17 in so far as the clause to 'take action to increase the supply of deliverable housing sites should completions fall below 15% of the housing trajectory' is too ambiguous. Clarity should be inserted to make explicit that this clause does not supersede the provisions of national policy in respect of a Council's obligations to have a five year housing land supply of deliverable sites and sufficient developable sites for years 6-15 from the date of adoption.</p> <p>The present wording does not provide sufficient clarify as to the mechanism and manner of the 'action' to be taken.</p>	<p>We believe that Policy CS17 should clarify that there is no change to the right to challenge the Council's five year housing land supply position in the event that either the evidence demonstrating a five year supply is insufficiently robust and/or there is a demonstrable deficit in the five year supply.</p>	Yes, I wish to participate at the oral examination	It is our belief that Allocation Proposal LA4 is important to meeting the new homes targets set out in the Core Strategy and it is therefore important that the site is represented at the examination.
626260		W J Mash & Sons	597730	Mr Peter Smith	PJSA Ltd	New Housing	CS17	Policy CS 17	Objecting	Yes	No	a) Justified	<p>It is unsound because it is not Justified or Consistent with national policy.</p> <p>Please see attached report.</p> <p>The absence of a local review of the Green Belt, including on land adjoining the Hemel Hempstead area, fails to be consistent with policy at the national and regional level. In addition, we do not accept that the overall approach to meeting the affordable housing requirement as well as the housing mix generally is justified or effective, particularly when considered against the reasonable alternatives.</p> <p>The CS as drafted has failed properly to take account of the contribution that land currently identified as being within the Green</p>	<p>Please see attached report.</p> <p>The release of land from the Green Belt can help deliver sustainable, mixed communities, including a material amount of affordable housing provision at 35% of the total to be provided.</p> <p>CS paragraph 14.32 sets out the affordable housing requirement, identifying that there is an annual need for affordable housing in Dacorum Borough totalling 265 dwellings, less than half the average yearly requirement set out in the EEP.</p>	No, I do not wish to participate at the oral examination	

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													<p>Belt can make to a sustainable pattern of development by concentrating on particular urban areas where housing need is greatest and public transport and employment/service opportunities are best concentrated.</p> <p>The failure of the CS to appraise, assess and identify the actual location for a Green Belt release is not consistent or justified.</p> <p>In absence of recognition of the need to review the Green Belt as an integral part of the spatial strategy, to allow more appropriate scale and location of development to occur, the CS must therefore be unsound.</p>			
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners	New Housing	CS17	Policy CS 17	Objecting	Yes	No	c) Consistent with national policy	<p>Housing Provision (policy CS17)</p> <p>Policy CS17 sets out the proposed provision of new housing, this being 430 dwellings per annum (equating to 10,750 over the 25 year plan period). This is significantly below the 12,400 homes required to maintain nil net migration across the Borough and massively below the 600 dwellings per annum required by the East of England Plan prior to the judicial review that ultimately quashed this figure.</p> <p>Consequently, the CS demonstrated fails to satisfactorily plan to meet the Borough's housing needs; it will not meet locally arising needs to let alone contribute to meeting the sub-regional needs of the wider area and indeed id deliberately and explicitly planning for that net outward migration.</p> <p>There is no evidence that adjoining Authorities, including Dacorum and Aylesbury Vale, have liaised with each other, as is now required</p>	Refer to response to question 4 above	No, I do not wish to participate at the oral examination	

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													<p>under the duty to co-operate as set out in both the Localism Act and the draft NPPF to ensure that cross administrative boundary issues are properly addressed. As an example AVDC has just granted consent for the ARLA Foods Applications at College Road, North on the A41 Aston Clinton by-pass about 2.5 miles from the western side of Tring for 450,000sq ft of B2/B8 uses with projected employment of up to 1230 people. (Applications 11/00962/AOP and 11/00964/AOP).</p> <p>The CS refers, at paragraph 14.16, to its balanced judgement in determining its housing target, it is considered that this has given too much weight to political pressure to minimise new development and in doing so its proposed figure of 430 dwellings per annum ignores, or at least pays insufficient regard to the evidence base available, notably ONS population and household projections and the Council's own SHMA.</p> <p>Dacorum should, as a minimum meet its own housing needs amounting to 12,400 homes over the plan period. Arguably, it should also meet a proportion of sub-regional growth, as was intended by the East of England Plan. Policy CS17 should be amended accordingly to incorporate an annual housing requirement of at least 500 dwellings.</p> <p>The second element of this policy relates to the monitoring of completions and if necessary reviewing sources of land supply. As was noted in the context of Policy CS3, which seeks to phase the release of local allocations, the relationship between the two</p>			

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													<p>policies is unclear. It is noted for example, that in the text below Policy CS17 a number of action points are listed under the sub-heading "Delivery will be achieved by", yet none of these refer either to the release of local allocations or the identification of additional sites over and above those already included in the CS.</p> <p>Moreover, as it would appear that the completions from 2006 to 2010 were already running at less than 85% of the 430 dwellings per annum target the Council should already be "taking action" to increase the supply of deliverable housing sites. This adds further weight to the contention that Policy CS3, as currently worded and without greater planned housing provision, is wholly unjustified.</p>			
627495	Mr Nigel Agg	TAYLOR WIMPEY UK LTD	210999	Mr Martin Friend	Vincent & Gorbing	New Housing	CS 17	Policy CS 17	Objecting	Yes	No		<p>Taylor Wimpey do not challenge the overall housing target of 10,750, based upon the comment in paragraph 14.9 of the Core Strategy that this is the level of housing which the Council "expects to achieve and exceed." However, in this context, Policy CS17 itself could be helpfully clarified to reflect this objective. At present the text merely states that "an average of 430 net additional dwellings will be provided each year (between 2006 and 2031)." It would provide greater certainty to add as follows : "...in order to achieve or exceed a total provision of 10,750 new homes within the plan period."</p> <p>Taylor Wimpey also support the basis for monitoring the supply of housing, enabling sites to be brought forward in a timely fashion should shortfalls in delivery start to</p>		Yes, I wish to participate at the oral examination	As an experienced housebuilder, Taylor Wimpey wish to appear at the examination to assist the inspector in considering the soundness of the overall development strategy, housing requirements and provision and the LA3 Local Allocation.



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													occur. Although the overall housing trajectory is not brought into question, some sites (such as the Hemel Hempstead Town Centre redevelopment) clearly pose challenges. In this context, it is important that there is flexibility within the Core Strategy to bring forward other sites, including the greenfield site allocations, to ensure housing delivery across the plan period is maintained. As highlighted above, the significant lead time to bring forward the land at West Hemel Hempstead should be recognised.			
627634	Mrs Anne Norah McWilliams		313230	Mr Edward Sibley	Sibley & Co	New Housing	CS 17	Policy CS 17	Objecting	Yes	No	b) Effective	There is insufficient land available to the Council to enable it to meet its projected target of the number of houses to be made available in the plan period (particularly in Hemel Hempstead itself) without the need to use green belt land for the development of a new neighbourhood centre in the vicinity of Shendish Manor.	The Council should re-consider its decision to exclude from its strategic housing policy the proposed neighbourhood centre in the vicinity of Shendish Manor as reflected in former council consultations under the heading "Blue Blob 3".	Yes, I wish to participate at the oral examination	Because the Council have decided to discard its former favourable consideration of a new neighbourhood centre in the vicinity of Shendish Manor without giving any reasons.
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	New Housing	CS 17	Policy CS 17	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  Some scenario testing is therefore essential to be included within the Submission Version of the Core Strategy, so that the appointed independent Inspector will be able to be more certain that the Council has explored 'worst case' scenarios for housing supply and has a delivery mechanism in place to respond accordingly. This should come as no surprise, since the Council has in the past three years experienced a significant problem with town centre redevelopment and a delay in town centre regeneration		No, I do not wish to participate at the oral examination	

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													because of the withdrawal of a main developer partner.			
501874		E.J. Hillier Will Trust	398719	Ms Jo Emmett	Hives Planning	New Housing	CS 17	Policy CS 17	Objecting	Yes	No	a) Justified	<p>The provision for housing made in Policy CS17 of the Core Strategy is Inadequate and does not reflect the evidenced needs of the Borough. The Core Strategy does not therefore provide the most appropriate strategy for the Borough when considered against reasonable alternatives, and is not sound under the terms of PPS12.</p> <p>The previous consultation on the Draft Core Strategy (December 2010) provided two 'Options' for housing delivery, and the Pre-Submission Core Strategy adopts 'Option 2' (430 dpa). Whilst this is higher than the 'Option 1' figure, this is still objected to because (as set out in our previous representation) this figure provides only for growth which results from an increase in household formation, and does not provide for an element of growth associated with natural Increases in population and assumes nil net migration. It is not realistic or sustainable to plan for such a low level of housing provision.</p> <p>Further, the 'Background Information Note: Population projections and the Core Strategy' sets out eight different dwelling projections (informed by population projections), six of which indicate a need for a higher number of dwellings than the Core Strategy provides for, over a shorter period (2011-2031, as opposed to 2006-2031). This is in line with expected increases in population and households across the country: therefore each Local Authority area needs to provide for its own expected Increases (it cannot be assumed simply that provision will</p>	Land at Grange Farm, Bovingdon should be identified as a local allocation. The allocation should include greater total housing provision (and should include affordable housing and housing for the elderly), plus open space and allotments.	Yes, I wish to participate at the oral examination	To enable a full discussion of the issues raised and assist the Inspector in responding to these, as appropriate.

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													be made elsewhere). Moreover, no cogent evidence has been produced by the Council to explain why this, higher, level of growth cannot be provided for - as such, the Core Strategy must be considered unsound as it does not provide for the evidenced future level of housing need in the borough.			
597806	Mr and Mrs M Kenealy		597730	Mr Peter Smith	PJSA Ltd	New Housing	CS 17	Policy CS 17	Objecting	Yes	No		It is unsound because it is not Justified and Consistent with national policy.  The absence of a local review of the Green Belt, including 0 land adjoining the Hemel Hempstead urban area, fails to be consistent with policy at the national and regional level. In addition, we do not accept that the overall approach to meeting the affordable housing requirement as well as the housing mix generally is justified or effective, particularly when considered against the reasonable alternatives.	Please see attached report.  The release of land from the Green Belt can help deliver sustainable, mixed communities including a material amount of affordable housing provision at 35% of the total provided.  CS paragraph 14.32 sets out the affordable housing requirement, identifying that there is an annual need for affordable housing in Dacorum Borough totalling 265 dwellings, less than half the average yearly requirement set out in the EEP.	No, I do not wish to participate at the oral examination	
633333	Mr Paul Harris	Dacorum Green Party				New Housing	CS17	Policy CS 17	Objecting	No	No	a) Justified	New housing should only be built on brownfield sites. If the council had gone for the lower option 7,000 houses would all have been built on brownfield sites. Under the higher option 1,550 will be built on Green Belt land, leaving the remainder to be built on brownfield sites. It is ridiculous to sacrifice Green Belt land for 1,550 homes plus the infrastructure needed. We also raise the issue of how many houses are empty in Dacorum and how many people are actually homeless in Dacorum?	We would like you to reconsider the lower option of 7,000 which is more ecological sustainable and enhance the quality of life for people in Dacorum. We would expect all new housing to have renewable technology and be energy efficient.	Yes, I wish to participate at the oral examination	I like to make a personal appearance.
494310	Mr Elliot	Barratt Strategic	494284	Mr Elliot	Rapleys LLP	Paragraph	Paragraoh 14.29	14.29	Supporting	Yes	Yes		This comment relates to Policy CS18: New Housing and Paragraph 14.29 of the supporting text.		Yes, I wish to participate at the oral	Our client is a national house builder, which has vast experience in

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	Jones			Jones									<p>Our client appreciates that development will need to provide for a mix of housing and supports the general approach set out in the policy.</p> <p>However, we note that Paragraph 4.29 states that 'housing should be designed to life-time homes standard'. Our client recognises that a certain amount of housing should be built to lifetime homes standard and/or mobility standards, but all new units should not be built to these standards.</p> <p>Well designed standard housing units are considered more than adequate for long-term use and future adaptation in many cases. It is suggested that the level of lifetime homes should be agreed on a case by case basis having regard to the specific site circumstances and matters such as identified housing need, the space available and viability issues.</p>		examination	<p>dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Mix of Housing	CS18	Policy CS 18	Supporting	Yes	Yes					
611657	Messrs M&D Gardener		611650	Mr John Heginbotham	Stimpsons	Mix of Housing	CS18	Policy CS 18	Supporting	Yes	Yes		As Representation on behalf of Taylor Wimpey by Martin Friend	As Representation on behalf of Taylor Wimpey by Martin Friend	Yes, I wish to participate at the oral examination	Our client's land is a significant component of LA3
503254		Royal Mail	625562	Ms Lisa Bowden	BNP Paribas Real Estate	Mix of Housing	CS18	Policy CS 18	Objecting	Yes	No		Royal Mail generally support the Council's approach to providing homes within the Borough and that the Council will be guided by strategic housing market assessments and housing need surveys as detailed in Policy CS18 (Mix of Housing). However, we request that the Council amend the	Change of wording to: "....guided by the strategic housing market assessment and housing needs surveys other market and informed by viability, other housing market intelligence and site-specific considerations."		

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													wording of this Policy to explicitly identify viability as one of these considerations.	Royal Mail support the flexibility provided in Policy CS19 (Affordable Housing), which clearly identifies that "Judgements about the level and mix of affordable housing will have regard to:  ...(c) the overall viability of the scheme and any abnormal costs".		
626260		W J Mash & Sons	597730	Mr Peter Smith	PJSA Ltd	Mix of Housing	CS18	Policy CS 18	Objecting	Yes	No	a) Justified	It is unsound because it is not Justified or Consistent with national policy.  <b>Needs of the Locality</b>  As GOSE have written in a statement dated 6.6.2007, "housing delivery is about more than meeting the strategic requirement, it is, inter alia, also about meeting need such that the right amount of housing of the right type is also located in the right places at the right time in a sustainable way".  As set out above, the affordability gap is prevalent in Dacorum and we remain of the view that providing for housing numbers on previously developed sites, within the urban area, is not necessarily meeting identified housing needs in terms of either quantity or quality (number and mix).  The release of land from the Green Belt can help deliver sustainable, mixed communities, including a material amount of affordable housing provision at 35% of the total to be provided.  Providing for suitably located urban extensions, including through a local Green Belt review, as an important component part of the CS, will help to ensure the provision of an		No, I do not wish to participate at the oral examination	

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													<p>appropriate mix of housing types and tenures.</p> <p>Reliance on housing delivery from previously developed sites within the urban areas often results in flatted development comprising of smaller units of 1 and 2 bedrooms.</p> <p>The release of Greenfield sites can provide the quantum of development to help deliver a more varied mix of housing types and tenures.</p> <p><b>Summary</b></p> <p>For reasons stated, we do not accept that the CS as drafted represents a sound strategy.</p> <p>The absence of a local review of the Green Belt, including on land adjoining the Hemel Hempstead urban area, fails to be consistent with policy at the national and regional level. In addition, we do not accept that the overall approach to meeting the affordable housing requirement as well as the housing mix generally is justified or effective, particularly when considered against the reasonable alternatives.</p>			
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd	Mix of Housing	CS 18	Policy CS 18	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective, Consistent with national policy.</p> <p>In relation to proposed affordable housing provision and thresholds, the Trustees consider firstly that Policy CS18 should also make reference to the viability of schemes, as a key criterion in defining the mix of a housing development.</p>		No, I do not wish to participate at the oral examination	
6274 95	Mr	TAYLOR WIMPEY	2109 99	Mr	Vincent & Gorbing	Mix of Housing	CS 18	Policy CS 18	Supporting	Yes	Yes		Taylor Wimpey also support policy CS 18 that requires a mix of		Yes, I wish to	As an experienced

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	Nigel Agg	UK LTD		Martin Friend									housing to allow for choice. It is in this context that the location and character of land allocated for housing development within Core Strategy is important. The greenfield allocations such as that at West Hemel Hempstead provide for diversity in the type of housing to be delivered within the Plan period. The development will provide family housing in a variety of tenures that will complement the town centre and other urban schemes that are more likely to be characterised by smaller units.		participate at the oral examination	housebuilder, Taylor Wimpey wish to appear at the examination to assist the inspector in considering the soundness of the overall development strategy, housing requirements and provision and the LA3 Local Allocation.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Mix of Housing	CS 18	Policy CS 18	Supporting	Yes	Yes		<p>This comment relates to Policy CS18: New Housing and Paragraph 14.29 of the supporting text.</p> <p>Our client appreciates that development will need to provide for a mix of housing and supports the general approach set out in the policy.</p> <p>However, we note that Paragraph 4.29 states that 'housing should be designed to life-time homes standard'. Our client recognises that a certain amount of housing should be built to lifetime homes standard and/or mobility standards, but all new units should not be built to these standards.</p> <p>Well designed standard housing units are considered more than adequate for long-term use and future adaptation in many cases. It is suggested that the level of lifetime homes should be agreed on a case by case basis having regard to the specific site circumstances and matters such as identified housing need, the space available and viability issues.</p>		Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.</p>
597806	Mr and Mrs		597730	Mr	PJSA Ltd	Mix of Housing	CS 18	Policy CS 18	Objecting	Yes	No		It is unsound because it is not Justified and Consistent with	Please see attached report.	No, I do not wish to	

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	M Kenealy			Peter Smith									national policy.  The absence of a local review of the Green Belt, including on land adjoining the Hemel Hempstead urban area, fails to be consistent with policy at the national and regional level. In addition, we do not accept that the overall approach to meeting the affordable housing requirement as well as the housing mix generally is justified or effective, particularly when considered against the reasonable alternatives.	The release of land from the Green Belt can help deliver sustainable, mixed communities including a material amount of affordable housing provision at 35% of the total provided.  CS paragraph 14.32 sets out the affordable housing requirement, identifying that there is an annual need for affordable housing in Dacorum Borough totalling 265 dwellings, less than half the average yearly requirement set out in the EEP.	participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 14.32	14.32	Objecting	Yes	No		P 111 Para 14.32 Object  " ... The full affordable housing requirement over the plan period (2006-2031) would be around 5,300 homes. While this level of provision is unlikely to be deliverable... A target of 35% is realistic and achievable, when compared with past achievement, economic conditions and costs associated with new building. "  It would be informative to have included here a paragraph summarising the numbers of all types actually built in recent years, or over the life of the existing Structure Plan.  In my response of 2010 I estimated that even at 35% this implied an annual build rate " during the period to 2031 of 158 dwellings: since the 2009 RSL number was reported to DCLG at 50 units, there is a huge gap that will not easily be closed.  Given the importance as set out in Para 14.1 " Decent homes are fundamental to people's wellbeing		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are discussed.



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													and quality of life, and the foundation for achieving balanced and sustainable communities. Sufficient homes should be available for all sectors in the community, ... "  <i>it is arguable that the Borough has already conceded that this aspect of its housing policy is an aspiration built on very weak foundations.</i>			
6268 21	Mr Neville Spiers	Paper Trail Trust	6268 19	Mr Chris Watts	Maze Planning Ltd	Paragraph	Paragraph 14.32	14.32	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy.  Secondly they welcome the cautious approach of the Council in advising that the assessed full level of need for affordable housing, at 5,300 homes is unlikely to be achieved in the Core Strategy period. This is a realistic position to take. However this will be a self fulfilling prophesy if the Council adheres to the proposed threshold of 35% on development sites of 0.3 hectares or more, or 10 dwellings or more.		No, I do not wish to participate at the oral examination	
2110 55	Mr Matthew Wood	Hertfordshire County Council				Paragraph	14.38	14.38	Supporting	Yes	Yes		HCC note the reference to eligibility criteria etc being worked up as part of  supplementary planning guidance and advice. Health and Community Services colleagues would hope to have nomination rights towards occupation of such affordable units, which might for example include supported living units. Further information relating to HCS accommodation needs to 2031, (which might be useful in informing Affordable Housing SPD or further Development Management Policies DPDs) is attached to these representations as Appendix A.		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy

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																Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
223914	Mrs Nichola Mills					Affordable Housing	CS19	Policy CS 19	Objecting	No	No	b) Effective	No development should be built on greenbelt.  Also building on the Greenbelt decreases biodiversity.	If the council had gone for the lower option , 7000 houses would all have been built on brownfield sites. Under the higher option 1550 will be built on greenbelt land, leaving the remainder to be built on brownfield sites.	No, I do not wish to participate at the oral examination	
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Affordable Housing	CS19	Policy CS 19	Supporting	Yes	Yes					
611549	Ms J Bowyer	Three Rivers District Council				Affordable Housing	CS19	Policy CS 19	Supporting	Yes	Yes		It would be helpful for the policy to explicitly state that financial contributions will be sought on sites of 1 to 5/10 dwellings, and to clarify whether these are gross or net figures.			
211660	Mr Garrick Stevens	Berkhamsted Town Council				Affordable Housing	CS 35	Policy CS 19	Objecting	Yes	No		Experience shows that investment in additional infrastructure lags far behind demands placed on them. A robust application of policy and methodology is warranted to underpin this critical Policy. For too long, policies have been framed to	Experience shows that investment in additional infrastructure lags far behind demands placed on them. A robust application of policy and methodology is warranted to	Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing allocations are

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													capture contributions from larger sites - whereas steady growth of small scale infilling/windfall has impacted the environment by stealth without corresponding investment in the infrastructure or public realm.	underpin this critical Policy.  For too long, policies have been framed to capture contributions from larger sites - whereas steady growth of small scale infilling/windfall has impacted the environment by stealth without corresponding investment in the infrastructure or public realm.		discussed.
467616	Mr Richard Ronald					Affordable Housing	CS19	Policy CS 19	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy.  The financial contribution is not justified or effective for smaller market housing projects less than 10 dwellings in the towns or less than 3 dwellings in the rural area.  The Council policy is likely to put a stop to much small scale projects with this stance. Particularly when combined with the Sustainable Housing policy CS29 these policies potentially will impose huge costs on small developers.  The Council's policies state that they seek balanced communities and request e.g. 35% Social Housing in Market Housing developments. There does not appear to be any corresponding policy to seek 35% market housing in Social Housing developments.  The Government have stated they are seeking local building projects to assist in the regeneration of communities, so this Policy is not in the interests of local or national government.	"Development of market housing of less than 10 dwellings in towns or 3 dwellings in Rural areas to be exempt from provision of contributions to local or strategic infrastructure, or to provide other financial contributions towards Social Housing.  Social Housing projects of 10 dwellings or more that contain Shared Ownership housing to contribute pro rata to Local and Strategic Infrastructure.  Large Social Housing projects to include 35% some form of market housing, to further the creation of balanced communities.	Yes, I wish to participate at the oral examination	
471307	George Edkins	Hightown Praetorian & Churches HA				Affordable Housing	CS 19	Policy CS 19	Objecting	Yes	No	b) Effective	We support the new Affordable Housing policy which introduces a 35% affordable housing obligation to all residential developments, and	The policy is simplified to read  "Affordable homes will be provided on sites of a size of	Yes, I wish to participate at the oral	In order to explain the issue from a specialist viewpoint

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													<p>specifies that this be delivered in kind (ie on site) where the size of the project is above certain thresholds, and commutes this to cash where the project size is below these thresholds, namely 10 or more units in Hemel Hempstead and 5 or more elsewhere.</p> <p>A 35% affordable requirement for a site just above the lower -elsewhere threshold, say 6 units, equates to an obligation to deliver just 2 homes.</p> <p>Our issue is with the high build cost of small schemes, and with the administrative and managerial impracticality of many more s106 Agreements each of which delivers just 2 affordable homes.</p> <p>For the housing association buyer, with scarce project staff, a small project uses just the same time in terms of the contract, the site meetings, etc (as indeed it does for the council's legal staff in preparing s106 agreement). Moreover, builders of small scheme also tend to have little experience of affordable housing design requirements.</p>	0.3ha or 10 dwellings or larger, and a financial contribution will be sought in lieu of affordable housing on sites which fall below these thresholds"	examination	
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Affordable Housing	CS 19	Policy CS 19	Supporting	Yes	Yes		<p>This comment relates to Policy CS19 Affordable Housing.</p> <p>Our client recognises the need to deliver affordable housing to meet the needs of the Borough and is generally supportive of the approach identified by the Council in Policy CS19.</p> <p>The identified considerations (a to</p>	<b>The wording</b> of Policy C19 should be amended to delete the following sentence: ' <i>A minimum of 75% of the affordable housing units provided should be for rent</i> '	Yes, I wish to participate at the oral examination	<p>Our client is a national house builder, which has vast experience in dealing with complex issues relating to housing delivery.</p> <p>Therefore, it is considered that</p>

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												<p>d), which will guide judgments about the level and mix of affordable housing, are considered to be reasonable and conclusive. This rightly includes consideration of the overall viability of the scheme and any abnormal costs associated.</p> <p>However, in addition, the policy also states that 'a minimum of 75% of the affordable housing units provided should be for rent'. It is considered that that the affordable housing tenure mix would be more appropriately considered on a site by site basis having regard to the identified considerations (a to d).</p> <p>It is suggested that further guidance on the Local Planning Authority's usual requirements would be more appropriately set out in the proposed Affordable Housing SPD, which can be more easily updated to reflect changes in housing need, deliver and Government guidance.</p>			our client can provide useful and meaningful input into discussions relative to housing (and wider development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.	
620322		West Herts College	620319	Ms Alison Tero	CBRE	Affordable Housing	CS19	Policy CS 19	Supporting	Yes	No		WHC supports the need for flexibility in relation to the provision of affordable housing. In particular, WHC supports the need to ensure that viability issues are taken into account when determining the appropriate level and type of affordable housing provided within a development scheme.		Yes, I wish to participate at the oral examination	<p>West Herts College (WHC) would like to participate at the oral part of the Examination if its proposed recommendations (as set out in these representations) are not included in the Submission version of the Core Strategy.</p> <p>WHC would like the opportunity to set out its reasoning for the</p>

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																recommendations made in its representations to ensure that the policies and vision set out in Core Strategy are considered 'sound' and that they support WHC's proposals for its Dacorum Campus.
625293		BIDWELLS				Affordable Housing	Policy CS19	Policy CS 19	Objecting	No	No		<p>The minimum of 75% Affordable Housing rent should be reworded, so that this is a target not an absolute. This would also be consistent with the remaining wording of the Policy which has regard to judgement approach.</p> <p>We believe the requirement of 35% of new dwellings for Affordable Homes does not have regard to the changes in economic circumstances, particularly with regard to changes to Grant Aid Funding for RSL's.</p> <p>The changes in Grant Aid Funding have had a negative impact on the economics of schemes. This negative impact should be reflected in the level of Affordable Homes to be provided; in the circumstances, the Policy wording should be amended so that it is a target of 35%, that is in terms of being an aspiration rather than mandatory. Again, this would be consistent in the later part of the Policy, which refers to judgement.</p>			
625438	Mr Chris		625439	Mr Adam	Bidwells	Affordable Housing	CS19	Policy CS 19	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>We object to Policy CS19 in so far</p>	Within Policy CS19 remove the statement that 'Higher Levels will be sought on sites which are specified in a development plan	Yes, I wish to participate at the oral	It is our belief that Allocation Proposal LA4 is important to

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	Ball			Halford									<p>as it relates to Higher Levels of Affordable Housing being sought on sites which are specified in a development plan document, on the grounds that it is not 'justified' or 'effective'.</p> <p>We support and commend the acknowledgement that affordable housing provision needs to be able to be tested on individual sites in relation to viability and need, however, we contend, for the reasons set out below that the Plan is 'unsound' unless it is revised to provide an equitable approach between allocated sites and other sites.</p> <p>Our principle concern is the inconsistency by which affordable housing percentages are proposed to be applied; sites allocated within the Development Plan Documents seemingly penalised by the simple fact of being identified through the proper planning processes.</p> <p>We are also concerned that the detail in relation to the calculation of contributions is to be relegated to a Supplementary Planning Document (SPD). Such documents are not afforded the same level of independent scrutiny as DPDs. The absence of the detail at Examination will make it practicably impossible to ascertain whether Policy CS19 meets the tests of soundness, in particular that it is 'justifiable' - founded on a robust and credible evidence base.</p>	<p>document' to leave a consistent direction of:</p> <p>"35% of the new dwellings should be affordable homes, provided development would be viable and need is evident."</p> <p>Insert detail into Policy CS19 in relation to the calculation of contributions.</p> <p>We consider that the above changes will insert consistency of approach within the Development Plan Document and make the Plan 'justified' and 'effective'.</p>	examination	meeting the new homes targets set out in the Core Strategy and it is therefore important that the site is represented at the examination.
626260		W J Mash & Sons	597730	Mr Peter Smith	PJSA Ltd	Affordable Housing	CS19	Policy CS 19	Objecting	Yes	No	a) Justified	<p><b>Market not Meeting Housing Needs</b></p> <p>CS paragraph 14.32 sets out the affordable housing requirement, identifying that there is an annual</p>		No, I do not wish to participate at the oral examination	

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													<p>need for affordable housing in Dacorum Borough totalling 265 dwellings, less than half the average yearly requirement set out in the EEP.</p> <p>The level of affordable housing need, identified in the Strategic Housing Market Assessment (SHMA) (published by Opinion Research Services in April 2010) is significant.</p> <p>The estimated tenure mix of housing requirement 2007 to 2021 as shown in the SHMA shows that Dacorum requires 4,800 Market Housing dwellings and 3,100 social rented housing dwellings.</p> <p>Evidence from the 2001 Census shows the travel to work patterns for London Commuter Belt West. Of the 303,400 employees working in the sub-region, 206,800 (68.2%) are also local residents. Paragraph 3.4 states "from this is can be argues that the study area has the makings of a housing market area, as it reflects where people both live and work".</p> <p><b>Housing Mix</b></p> <p>As GOSE stated, "housing delivery is about more than meeting the strategic requirement, it is, inter alia, also about meeting need such that the right amount of housing of the right type is also located in the right places at the right time in a sustainable way".</p> <p>As set out above, the affordability gap is prevalent in Dacorum Borough (See also SHMA) and we remain of the view that providing for housing numbers on previously developed sites, within the urban</p>			



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													<p>area, is not necessarily meeting identifies housing needs in terms of either quantity or quality (number and mix).</p> <p>The release of land from the Green Belt can help deliver sustainable, mixed communities, including a material amount of affordable housing provision at 35% of the total to be provided.</p> <p>Providing for suitably located urban extensions, including through a local Green Belt review, as an important component part of the CS, will help to ensure the provision of an appropriate mix of housing types and tenures.</p> <p>Reliance on housing delivery from previously developed sites within the urban areas often results in flatted development comprising of smaller units of 1 and 2 bedrooms.</p> <p>The release of greenfield and brownfield sites can provide the quantum of development to help deliver a more varied mix of housing types and tenures.</p> <p>For the reasons states, we do not accept that the CS as drafted represents a sound strategy.</p> <p>The absence of a local review of the Green Belt, including on land adjoining the Hemel Hempstead area, fails to be consistent with policy at the national and regional level. In addition, we do not accept that the overall approach to meeting the affordable housing requirement as well as the housing mix generally is justified or effective, particularly when considered against the reasonable alternatives.</p>			

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632747	Mr George Crutcher	George Crutcher Planning				Affordable Housing	CS19	Policy CS 19	Objecting	Yes	No	b) Effective	<p>The section of the core strategy on Affordable Housing and Policy CS19 are not sound. They are not in accordance with National Policy as they are based on evidence which is not "as up to date as practical having regard to what may have changed since the evidence base was collected." (PPS12 para 4.37).</p> <p>The site size threshold for the provision of affordable housing is based on the findings of the Affordable Housing and S 106 Viability Study (AHVS). These findings relied upon data collected in late 2008 and an assessment of the economics of development at that time. Since then the economics of development have changed considerably. The value of completed development (i.e. house sale prices) have fallen, whilst the costs of development has risen due to higher commodity prices, transport costs and the higher cost of short/medium term funding. This has had an effect on the viability of development and the extent to which the additional cost of affordable housing can be borne - especially on small sites, and those on previously developed land..</p> <p>Policy CS19 fails to recognise these changes and requires 35% of houses on all sites above 0.16ha (rural areas) and 0.3ha (Hemel Hempstead) to be affordable. No distinction is made between brownfield and greenfield sites, and the higher costs inevitably associated with redevelopment of the former (because of the need to fund site clearance and decontamination) are not acknowledged or taken account of in the Policy or its preamble.</p>			

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													<p>The application of this Policy, as written, will have the effect of undermining the redevelopment, for housing, of small sites, especially previously developed sites.</p> <p>The Policy should set a range of site size thresholds based on an up to date assessment of the economics of development in different parts of the district, and which recognise the different economics of development which apply in the case of previously developed sites.</p> <p>This difference is acknowledged in the AHVS, but is not reflected in its analysis or case studies. None of the selected case studies relate to a previously developed site.</p> <p>Further, and oddly, in Chapter 3, on "High Level Testing" the study states that "the residual values shown [in the case studies] will be the same whether the site is greenfield or on previously developed land" and that "the Chapter explains this" or though it does not do so. As this is a counter intuitive position for the AHVS to adopt and flies in the face of development industry experience it requires explanation and justification, but none is given.</p> <p>As a consequence the Core Strategy and Policy CS19 also make no distinction between developments on greenfield and previously developed sites.</p> <p>The policy does make reference to "the overall viability of the scheme and any abnormal costs;" but only in relation to level and mix of affordable housing, not site size threshold. It will be for the developer/landowner to say why a</p>			

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												<p>lower level of provision should be applied (para 14.34) and viability will be tested by "an open book financial appraisal".</p> <p>However, most potential projects for the redevelopment of previously developed sites, especially small ones, will not get that far as a preliminary assessment of net residual value, applying the full requirements of Policy CS19, is likely to show that the job is not worth the candle. Such sites will not come forward, and the valuable, potential contribution they could make to housing supply will be choked off.</p> <p>The Affordable Housing section of the Core Strategy, and CS19 should therefore be redrafted to reflect the above concerns, and in the light of the findings of an up to date assessment of residual land values and the economics of development for different parts of the District and different types of site.</p>				
597806	Mr and Mrs M Kenealy		597730	Mr Peter Smith	PJSA Ltd	Affordable Housing	CS 19	Policy CS 19	Objecting	Yes	No		<p>It is unsound because it is not Justified and Consistent with national policy.</p> <p>The absence of a local review of the Green Belt, including on land adjoining the Hemel Hempstead urban area, fails to be consistent with policy at the national and regional level. In addition, we do not accept that the overall approach to meeting the affordable housing requirement as well as the housing mix generally is justified or effective, particularly when considered against the reasonable alternatives.</p>	<p>Please see attached report.</p> <p>The release of land from the Green Belt can help deliver sustainable, mixed communities including a material amount of affordable housing provision at 35% of the total provided.</p> <p>CS paragraph 14.32 sets out the affordable housing requirement, identifying that there is an annual need for affordable housing in Dacorum Borough totalling 265 dwellings, less than half the average yearly requirement set out in the EEP.</p>	No, I do not wish to participate at the oral examination	

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626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Affordable Housing	CS 19	Policy CS 19	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective, Consistent with national policy.</p> <p>The basis for this threshold is the evidence in the 2009 Strategic Housing Market Assessment report, but it is feared that the evidence and market based approach is now out of date. The Trustees believe that if the Council insist in Policy CS19 on demanding 35% affordable housing on general sites, and even more on allocated Development Plan sites, then this would risk making such sites unviable.</p> <p>It is considered that no threshold is actually needed in practice, and that every major scheme that is submitted could be accompanied by a formal viability assessment so that the viability of a scheme would then determine the appropriate level of on-site affordable housing, or in certain circumstances, an off-site Section 106 contribution, or indeed to identify schemes where no affordable housing would be possible on viability grounds but which would instead be able to deliver high quality mixed use schemes which would include a good mix and range of market housing, which is also needed in the Borough.</p> <p>The reference in Policy CS19 to viability as being a key criterion for both larger sites and others is therefore welcomed. This reference is essential to ensure that applicants have the ability to demonstrate the viability of a scheme or otherwise if affordable housing is sought on site, or as an off-site contribution.</p> <p>The requirement that on rural sites the developments should be 100%</p>		No, I do not wish to participate at the oral examination	

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													<p>affordable is also noted. The Trustees consider that this is unnecessarily restrictive, and that in many cases it would allow only green field sites to be brought forward, which have a lower residual land value, at the expenses of developing brown field previously developed land first. This would seem to be at odds with a sustainable development strategy in PPS1, PPS3 and the Core Strategy itself.</p> <p>It is also in this section of the Core Strategy that a fundamental change is needed to bring in the requirements of the Localism Act, so that neighbourhood plans and other delivery mechanisms are referred to.</p> <p><b>Delivery</b></p> <p>Finally, again there is no reference in the delivery section to the flexible and pro-active used of Section 106 Contributions to reflect viability of schemes and to ensure that as many as possible come forward and are delivered on the ground.</p>			
211503	Mr Colin White	Chilterns Conservation Board				Rural Sites for Affordable Homes	CS20	Policy CS 20	Supporting	Yes	Yes		<p>A Conservation Board is a statutory independent corporate body set up by Parliamentary Order under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.</p> <p>Section 87 of the CRoW Act sets out the purposes of a conservation board as:</p> <p>a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and</p> <p>b) the purpose of increasing the</p>	No, I do not wish to participate at the oral examination		

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													<p>understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty</p> <p>But if it appears to the board that there is a conflict between those purposes, they are to attach greater weight to the purpose mentioned in paragraph (a).</p> <p>Furthermore "A conservation board, while having regard to the purposes mentioned in subsection (1) [of Section 87], shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty."</p> <p>Section 85 of the CRoW Act states under "General duty of public bodies etc"</p> <p>"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."</p> <p>The Board is grateful for the opportunity to comment on the document that is the subject of consultation (and which it welcomes and generally supports) and trusts that its comments are taken on board. The attached response has been prepared by Colin White, Planning Officer, under delegated powers and will be presented for approval to the Conservation</p>			

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													<p>Board's Planning Committee which meets on 8<sup>th</sup> February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further information do not hesitate to contact the writer. Please note that the Board has only commented on those elements of the consultation document that are considered to have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>The policy is supported as drafted.</p>			
605890	Mr Peter Mercer MBE	National Federation of Gypsy Liaison Groups	602704		Derbyshire Gypsy Liaison Group	New Accommodation for Gypsies and Travellers	CS 22	Policy CS 22	Objecting	No	No	a) Justified	<p>Please note that I consider Policy CS 22 to be unsound because it is not justified, effective or consistent with national policy. The consultation portal will allow only one element to be selected.</p> <p>The policy should contain the minimum numbers of plots/pitches to be delivered, and over what time scale. Whilst this information is, according to Table 7, contained in policy CS 17, it should be set out in policy CS 22 for clarity. In addition, it is not clear how the working arrangements across Hertfordshire will deliver transient pitches or accommodation for Travelling Showpeople - there are no timescales, minimum targets or other details of how this will be achieved. This will be difficult to monitor and such a vague approach will stifle delivery.</p> <p>The criteria in policy CS 22 are unreasonably restrictive and should be amended in order to make the policy sound (see changes below). Are proposals for accommodation for Travelling Showpeople to be assessed against this policy?</p>	<p>Criterion (a) should be deleted because it is not justified or effective. An applicant for a small private family site should not be expected to consider a dispersed distribution pattern, and when considering allocations, then sites which could otherwise be considered suitable may be ruled out because they do not follow this particular pattern of distribution. It is an unrealistic approach to site selection.</p> <p>Criterion (b) should be amended to read: 'reasonably accessible to facilities'. This would ensure that the criterion reflects current government guidance (Circular 01/2006, paragraph 54) and allows a degree of flexibility in site selection.</p> <p>Criterion (d) outlines an approach to phasing occupancy which is not justified. If the site is being delivered to meet a need, then it is not appropriate to delay occupancy. In terms of private site delivery this is particularly nonsensical.</p>	No, I do not wish to participate at the oral examination	



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														<p>Criterion (e) is too prescriptive and not justified. Design should be of a high standard, but the particular landscaping and other issues are by their nature a matter for the development control process. It may not be appropriate for all sites to have an open frontage, for example where that would involve removing established landscaping features such as mature trees or hedges.</p> <p>The element of the policy which describes 'Priority will be given to the provision of sites which are defined on the Proposals Map. If other proposals come forward, they will be judged on the basis of need for that provision'. This approach is again not justified. Proposals should be judged against the policy criteria. This approach is particularly inconsistent with the approach to housing generally, as set out in the core strategy. Paragraph 14.9 states 'The housing target in policy CS17 sets a level of housing which the council expects to achieve and exceed' - clearly there is no onus on mainstream housing applicants to produce evidence of need, and since the pitch figures are included in CS17, then the same approach should be adopted. Furthermore, paragraph 14.12 goes on to state 'Windfalls (i.e. previously unidentified sites which usually provide fewer than five dwellings each) will inevitable occur and are an element of supply'. Again this represents an inconsistency of approach between housing types which is not justified.</p>		
223914	Mrs Nichola					New Accommodation for Gypsies and	CS22	Policy CS 22	Objecting	No	No	b) Effective	No development should be built on greenbelt. Brownfield sites must be	Protection of green belt land should be a priority.	Yes, I wish to participate	

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	Mills					Travellers							used instead.  Also building on the Greenbelt decreases biodiversity.		at the oral examination	
611549	Ms J Bowyer	Three Rivers District Council				New Accommodation for Gypsies and Travellers	CS22	Policy CS 22	Supporting	Yes	Yes	b) Effective	The delivery mechanism for the policy sets out that delivery will be achieved through the identification of sites in site allocations, but the policy does not specifically set out what level of need will be provided for so it is not clear whether the RSS requirement as set out at Table 10 will be met. It is suggested that the effectiveness of the policy would be improved by stating the level of need that will be provided for.	The policy should state the level of need that will be provided for.	No, I do not wish to participate at the oral examination	
619517	Mr Robert Ian Gomarsall	Tring Bowling Club				Meeting community needs	Section 15	15	Objecting	No	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.  We think there should be an acknowledge in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.	We would suggest the following change to paragraph 15.18:  "Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of supporting participation".	No, I do not wish to participate at the oral examination	
619543	Mr	Tring Hockey				Meeting community	Section 15	15	Objecting	No	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring		No, I do not wish to	

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	Patrick Barr	Club				needs						d	<p>Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.</p> <p>We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.</p>	<p>We would suggest the following change to paragraph 15.18:</p> <p>"deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation."</p>	participate at the oral examination	
619998	Mr Howard Clarke					Meeting community needs	Section 15	15	Objecting	Yes	No	a) Justified	<p>I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.</p> <p>We think there should be an acknowledgement in the central Core Strategy document that the</p>		No, I do not wish to participate at the oral examination	

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													2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.			
619551	Mr Chris Roberts	Tring Swimming Club				Meeting community needs	Section 15	15	Objecting	No	No	a) Justified	<p>I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.</p> <p>We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.</p>	<p>We would suggest the following change to paragraph 15.18:</p> <p>"Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation".</p>		
619545	Mr Michael Eldridge	Tring Athletic Football Club				Meeting community needs	Section 15	15	Objecting	No	No	a) Justified	<p>I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I</p>	<p>We would suggest the following change to paragraph 15.18:</p> <p>"Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation".</p>	No, I do not wish to participate at the oral examination	

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													<p>therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.</p> <p>We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.</p>			
489516	Mr Christopher Allen	Tring Sports Forum				Meeting community needs	Section 15 Meeting Community Needs (Leisure)	15	Objecting	Yes	No		<p>Paragraph 15.18 states that the 2008 Open Space Study has identified "deficiencies in leisure space in the borough" and paragraph 15.20 states that "the Council will need to use existing land and buildings to rectify the deficiencies...and help respond to changing recreational and leisure demands".</p> <p>However, it is Tring Sports Forum's firm view that the 2008 Open Space Study - which relies heavily on a report delivered in October 2006 by a firm of consultants, Knight Kavanagh and Page - identified the deficiencies on the basis of partly inaccurate data that particularly affected Tring. Our own survey (submitted to Dacorum BC Spatial Planning on 23 September 2010) clearly indicates that these deficiencies are far greater than suggested and that the study significantly underestimates the demand and overstates the supply of sporting facilities in Tring. This also brings into question the accuracy of the study for the rest of Dacorum.</p> <p>We would add that the assessment</p>	<p>We think that the supporting evidence base to the Core Strategy should be updated, and the Spatial Strategy for Tring consequently amended, in order to reflect the actual (higher) need for open space and sports facilities in the town; otherwise the strategy is not sound and is not founded on "a robust and credible evidence base".</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Tring Sports Forum represents the views of a significant number of local residents of Tring and the Inspector may therefore find it helpful for a representative of the forum to attend the Examination hearings, where appropriate.</p>

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													<p>of facility provision in the Core Strategy takes as its benchmark the lowest level NPFA standard of 1.6 hectares per <b>1000</b> population (hpk) rather than the higher end of the scale figure of 1.8hpk, or even the median.</p> <p>In the Report of Consultation, Volume 6, Annex A, an individual responding to Question 11 regarding Community Needs comments: "The Open Space Study dated 2008 is based on an audit of each site taken in July and September 2004. The relevance of the audit information relative to seal has to be redone and taking into account National Governing. Body standards and competitive structures to make the basis of the Open Space Study reliable for this Core Strategy?"</p> <p>We also note that in the public consultation on the Decorum Planning Obligations SPD adopted in April 2011 one organisation, Grand Union Investments, comments on paragraph 4.0 (Open Space) as follows: "It is considered that the assumptions made in this section are based on out of date supporting studies, for example, the Decorum Sport and Recreation Study Outdoor Sports Facilities Assessment Report (2006)..."</p> <p>Responding to the criticisms made of the evidence base for sports facilities, Decorum BC writes: "Current technical information is considered adequate for Core Strategy purposes. However, the Council will consider whether to update the Outdoor Sports Facilities Study to support subsequent planning documents."</p>			

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													This response is not satisfactory and, by knowingly producing a Pre-Submission Core Strategy document which is founded on an out of date evidence base, the Core Strategy as drafted fails the "soundness" tests of PPS12. (The document is not "justified", because it is not founded on "a robust and credible evidence base".)			
629238	Mr Malcolm Newton					Meeting community needs	Section 15 Meeting Community Needs (Leisure)	15	Objecting	Yes	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities In Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified L I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.  We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.	We would suggest the following change to paragraph 15.18:  "Deficiencies In leisure space in the borough have however been identified" becomes "Deficiencies in leisure space In the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation".	No, I do not wish to participate at the oral examination	
629253	Mr Stephen Jones					Meeting community needs	Section 15 Meeting Community Needs (Leisure)	15	Objecting	Yes	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and	We would suggest the following change to paragraph 15.18:  "Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and	No, I do not wish to participate at the oral examination	

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													overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.  We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.	updated to reflect specific shortfalls in facility provision and increased levels of sporting participation		
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	15.1 and Figure 14	15.1	Supporting	Yes	Yes		The Trust welcomes the recognition of the need for a wide range of social infrastructure to support the day-to-day living needs and well-being of society. We also welcome the Figure 14 definition of Social Infrastructure including community buildings and places of worship.			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	15.1	15.1	Supporting	Yes	Yes		The identification of education and community/civic/leisure/cultural buildings within the definition of social infrastructure is welcomed as covering the sweep of the County Council's service interests in DBC. HCC has commented on the expandability of existing primary school sites in previous representations, (paragraph 3.10 above cross references to the relevant paragraphs of those previous representations).	Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the	



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																critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
211041	Ms Rose Freeman	The Theatres Trust					Figure 14	Box Figure 14	Objecting	Yes	Yes		We support the document in respect of Policies CS23 and CS33 which will promote new and protect existing social infrastructure (cultural facilities) but with some comments.  <b>Comments</b>  The document uses descriptive terms which are not consistent. Social, leisure, cultural and community facilities are mixed up in the policies and supporting text. Cultural facilities are identified at para.15.22 on page 120 and social infrastructure is described on page 117. However, in our opinion, schools, houses and hospitals are not 'social' items but are particularly community facilities. The section on infrastructure (page 223) also introduces 'local infrastructure' e.g. schools and sports facilities. We do not think the document is clear on these definitions and suggest that one definition is used throughout for clarity and greater certainty of		No, I do not wish to participate at the oral examination	

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													intended outcomes.  So that guidelines are clear and consistent we recommend a description for the term 'community facilities': <i>community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. This term and definition should be used for Policy CS23 with the infrastructure section on page 223 categorising the component parts of the term 'community facilities' to include Figure 14 and para.15.22.</i>  <b>We also find the document</b> unnecessarily long and although it does not undermine the soundness of the CS, it obscures its key themes and entails repetition.			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	15.2	15.2	Supporting	Yes	Yes		The Trust welcome and support the need to acknowledge the aspirations of the Dacorum Community Strategy and the local planning system in promoting and improving community well-being and delivery of the social infrastructure required. We welcome the commitment to help with the provision of social infrastructure to supply the right facilities in the right place.			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	15.5	15.5	Supporting	Yes	Yes		Hertfordshire Property and colleagues in Childrens Services offer full support to the statements contained within the Core Strategy relating to the collaborative partnership that has been established between DBC and HCC. In particular, HCC supports;  Establishment of two new education zones in Berkhamsted The fact that the LPA has	Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector	

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													<p>placed the need to accommodate additional nursery, primary and secondary school places on existing school sites</p> <p>The fact that the LPA have confirmed that it would be prudent to plan for 'a number' of new primary schools.</p> <p>Methodology Employed to Assess the need for additional School Capacity</p> <p>3.16 Previous assessments of the need for additional school places in Dacorum had been assessed on the basis of 1 longitudinal form of entry per 850 dwellings. That equates to 24.7 children per 100 units. However, latest evidence of averages across Hertfordshire suggests that assuming 1fe per 500 units, (or 42 children per 100 dwellings) will only underestimate child yield 2.5% of the time, in other words, provide a 97.5% confidence level that child yield is not being underestimated.</p> <p>It is reasonable to conclude that the child yield from new developments will be somewhere in the above range. However, DBC have rolled forward the idea of two contingent reserve education site allocations, (referenced at Section 27.14 of the plan third bullet point), which would be released for development if, and when required.</p> <p>HCC would encourage review of the location of any such education reserve sites in the light of housing delivery, perhaps every 5 years ?</p> <p>3.18 The prudent nature of identifying education reserve sites</p>			<p>understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.</p>

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													to cater for any volatility in child yields will be self evident.			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	15.6	15.6	Supporting	Yes	Yes		<p>Hertfordshire Property and colleagues in Childrens Services offer full support to the statements contained within the Core Strategy relating to the collaborative partnership that has been established between DBC and HCC. In particular, HCC supports;</p> <p>Establishment of two new education zones in Berkhamsted</p> <p>The fact that the LPA has placed the need to accommodate additional nursery, primary and secondary school places on existing school sites</p> <p>The fact that the LPA have confirmed that it would be prudent to plan for 'a number' of new primary schools.</p> <p>Methodology Employed to Assess the need for additional School Capacity</p> <p>3.16 Previous assessments of the need for additional school places in Dacorum had been assessed on the basis of 1 longitudinal form of entry per 850 dwellings. That equates to 24.7 children per 100 units. However, latest evidence of averages across Hertfordshire suggests that assuming 1fe per 500 units, (or 42 children per 100 dwellings) will only underestimate child yield 2.5% of the time, in other words, provide a 97.5% confidence level that child yield is not being under estimated.</p> <p>It is reasonable to conclude that the child yield from new developments</p>		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.

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													<p>will be somewhere in the above range. However, DBC have rolled forward the idea of two contingent reserve education site allocations, (referenced at Section 27.14 of the plan third bullet point), which would be released for development if, and when required.</p> <p>HCC would encourage review of the location of any such education reserve sites in the light of housing delivery, perhaps every 5 years ?</p> <p>3.18 The prudent nature of identifying education reserve sites to cater for any volatility in child yields will be self evident.</p>			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	15.7	15.7	Supporting	Yes	Yes		<p>Hertfordshire Property and colleagues in Childrens Services offer full support to the statements contained within the Core Strategy relating to the collaborative partnership that has been established between DBC and HCC. In particular, HCC supports;</p> <p>Establishment of two new education zones in Berkhamsted</p> <p>The fact that the LPA has placed the need to accommodate additional nursery, primary and secondary school places on existing school sites</p> <p>The fact that the LPA have confirmed that it would be prudent to plan for 'a number' of new primary schools.</p> <p>Methodology Employed to Assess the need for additional School Capacity</p> <p>3.16 Previous assessments of the need for additional school places in</p>		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to

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													<p>Dacorum had been assessed on the basis of 1 longitudinal form of entry per 850 dwellings. That equates to 24.7 children per 100 units. However, latest evidence of averages across Hertfordshire suggests that assuming 1fe per 500 units, (or 42 children per 100 dwellings) will only underestimate child yield 2.5% of the time, in other words, provide a 97.5% confidence level that child yield is not being underestimated.</p> <p>It is reasonable to conclude that the child yield from new developments will be somewhere in the above range. However, DBC have rolled forward the idea of two contingent reserve education site allocations, (referenced at Section 27.14 of the plan third bullet point), which would be released for development if, and when required.</p> <p>HCC would encourage review of the location of any such education reserve sites in the light of housing delivery, perhaps every 5 years ?</p> <p>3.18 The prudent nature of identifying education reserve sites to cater for any volatility in child yields will be self evident.</p>			assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	15.7	15.7	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>As stated in our representations on the Draft Core Strategy, the release of large Green Belt sites for new built development in the form of new schools in tandem with redevelopment of existing school sites for housing, is contrary to national Green Belt policy and is not justified by supporting evidence.</p>	The Education Zones should be deleted from the Core Strategy.	Yes, I wish to participate at the oral examination	To ensure that the Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.
2110	Mr	Hertfordshir				Paragraph	15.8	15.8	Supporti	Ye	Ye		Hertfordshire Property and		Yes, I wish	It is considered

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55	Matthew Wood	ere County Council							ng	s	s		<p>colleagues in Childrens Services offer full support to the statements contained within the Core Strategy relating to the collaborative partnership that has been established between DBC and HCC. In particular, HCC supports;</p> <p>Establishment of two new education zones in Berkhamsted</p> <p>The fact that the LPA has placed the need to accommodate additional nursery, primary and secondary school places on existing school sites</p> <p>The fact that the LPA have confirmed that it would be prudent to plan for 'a number' of new primary schools.</p> <p>Methodology Employed to Assess the need for additional School Capacity</p> <p>3.16 Previous assessments of the need for additional school places in Dacorum had been assessed on the basis of 1 longitudinal form of entry per 850 dwellings. That equates to 24.7 children per 100 units. However, latest evidence of averages across Hertfordshire suggests that assuming 1fe per 500 units, (or 42 children per 100 dwellings) will only underestimate child yield 2.5% of the time, in other words, provide a 97.5% confidence level that child yield is not being under estimated.</p> <p>It is reasonable to conclude that the child yield from new developments will be somewhere in the above range. However, DBC have rolled forward the idea of two contingent reserve education site allocations.</p>		to participate at the oral examination	that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.

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													(referenced at Section 27.14 of the plan third bullet point), which would be released for development if, and when required.  HCC would encourage review of the location of any such education reserve sites in the light of housing delivery, perhaps every 5 years ?  3.18 The prudent nature of identifying education reserve sites to cater for any volatility in child yields will be self evident.			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	15.9	15.9	Supporting	Yes	Yes		Hertfordshire Property and colleagues in Childrens Services offer full support to the statements contained within the Core Strategy relating to the collaborative partnership that has been established between DBC and HCC. In particular, HCC supports;  Establishment of two new education zones in Berkhamsted The fact that the LPA has placed the need to accommodate additional nursery, primary and secondary school places on existing school sites The fact that the LPA have confirmed that it would be prudent to plan for 'a number' of new primary schools.  Methodology Employed to Assess the need for additional School Capacity  3.16 Previous assessments of the need for additional school places in Dacorum had been assessed on the basis of 1 longitudinal form of entry per 850 dwellings. That equates to 24.7 children per 100 units.		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that



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													<p>However, latest evidence of averages across Hertfordshire suggests that assuming 1fe per 500 units, (or 42 children per 100 dwellings) will only underestimate child yield 2.5% of the time, in other words, provide a 97.5% confidence level that child yield is not being under estimated.</p> <p>It is reasonable to conclude that the child yield from new developments will be somewhere in the above range. However, DBC have rolled forward the idea of two contingent reserve education site allocations, (referenced at Section 27.14 of the plan third bullet point), which would be released for development if, and when required.</p> <p>HCC would encourage review of the location of any such education reserve sites in the light of housing delivery, perhaps every 5 years ?</p> <p>3.18 The prudent nature of identifying education reserve sites to cater for any volatility in child yields will be self evident.</p>			attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Paragraph	15.10	15.10	Supporting	Yes	Yes		The Brethrens Christian Fellowship are private education providers in the area, with a primary and secondary school established in Central Bedfordshire. Replacement or additional facilities may be required in the area during the plan period. The Trust therefore welcomes the recognition of the important role of the private sector in education.			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	15.10	15.10	Supporting	Yes	Yes		Hertfordshire Property and colleagues in Childrens Services offer full support to the statements contained within the Core Strategy relating to the collaborative partnership that has been established between DBC and		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire Property (and appropriate

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													<p>HCC. In particular, HCC supports;</p> <p>Establishment of two new education zones in Berkhamsted</p> <p>The fact that the LPA has placed the need to accommodate additional nursery, primary and secondary school places on existing school sites</p> <p>The fact that the LPA have confirmed that it would be prudent to plan for 'a number' of new primary schools.</p> <p>Methodology Employed to Assess the need for additional School Capacity</p> <p>3.16 Previous assessments of the need for additional school places in Dacorum had been assessed on the basis of 1 longitudinal form of entry per 850 dwellings. That equates to 24.7 children per 100 units. However, latest evidence of averages across Hertfordshire suggests that assuming 1fe per 500 units, (or 42 children per 100 dwellings) will only underestimate child yield 2.5% of the time, in other words, provide a 97.5% confidence level that child yield is not being underestimated.</p> <p>It is reasonable to conclude that the child yield from new developments will be somewhere in the above range. However, DBC have rolled forward the idea of two contingent reserve education site allocations, (referenced at Section 27.14 of the plan third bullet point), which would be released for development if, and when required.</p> <p>HCC would encourage review of the</p>			<p>services) are available to attend the Examination in Public in order to ensure that the Inspector understands the approach to facilitation of opportunities to deliver services within the Core Strategy Consultation document, the critical link between development and infrastructure, and the need for appropriate funding mechanisms to be put in place to assist in the delivery of the same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.</p>

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													location of any such education reserve sites in the light of housing delivery, perhaps every 5 years ?  3.18 The prudent nature of identifying education reserve sites to cater for any volatility in child yields will be self evident.			
488516	mr Hugh siegle					Paragraph	15.12	15.12	Objecting	No	b) Effective		Much greater clarity of policy on healthcare provision is required. What is meant by "General Hospital" in terms of services to be offered on the existing Hemel site? What is the timing? What will be the exact role and responsibility of the Council in delivering the healthcare required by a population which is growing and ageing and employment is to be created. Surely a Borough of this size should have a high degree of self-sufficiency in these essential services		No, I do not wish to participate at the oral examination	
620486	Mrs Joan Desborough	Tring Lawn Tennis Club				Paragraph	15.18	15.18	Objecting	Yes	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.  We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the	We would suggest the following change to paragraph 15.18:  "Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation".	No, I do not wish to participate at the oral examination	

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													evidence base) requires amendment and updating.			
625882		Tring Squash Club				Paragraph	15.18	15.18	Objecting	Yes	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.	We would suggest the following change to paragraph 15.18:  "Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation".	No, I do not wish to participate at the oral examination	
625887		Pendley Sports Centre				Paragraph	15.18	15.18	Objecting	Yes	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.  We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires	We would suggest the following change to paragraph 15.18:  "Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation".	No, I do not wish to participate at the oral examination	

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													amendment and updating.			
626341	Ms Vivienne Bryan	Tring TLC				Paragraph	15.18	15.18	Objecting	Yes	No	a) Justified	I am aware of the errors in the evidence base highlighted by Tring Sports Forum (TSF) in their response to the Strategy and specifically the Knight Kavanagh and Page report of 2006 for which TSF have supplied proof of inaccuracies. I agree with TSF that this report significantly underestimates the demand and overstates the supply of sporting facilities in Tring and that as this is the main evidence base being used to support the strategy, that the strategy is therefore not justified. I therefore support and agree with the amendments to the Strategy suggested by Tring Sports Forum as detailed below.  We think there should be an acknowledgement in the central Core Strategy document that the 2008 Open Space Study (along with the 2006 Knight, Kavanagh and Page report that informs the evidence base) requires amendment and updating.	We would suggest the following change to paragraph 15.18:  "Deficiencies in leisure space in the borough have however been identified" becomes "Deficiencies in leisure space in the borough have however been identified through the 2008 Open Space Study, which will be reviewed and updated to reflect specific shortfalls in facility provision and increased levels of sporting participation".	No, I do not wish to participate at the oral examination	
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	15.21	15.21	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Consistent with national policy.  The wording of this paragraph implies that new school sites in the Green Belt (objecting to in representations on Para 15.7 and Policy CS23) would include indoor sports facilities. This would also be contrary to nation Green Belt policy and the stated objective of the Core Strategy to protect the Green Belt.	The words 'subject to compliance with Green Belt and countryside policies in the case of facilities outside existing settlements', should be added to the first sentence.	Yes, I wish to participate at the oral examination	To ensure that the Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.
366491	Mr Brian Worrell					Paragraph	15.22	15.22	Objecting	Yes	No	b) Effective	Although all that is stated in this paragraph is excellent, it has to be recognised that DBC has no 'tourism' person that co-ordinates or promotes the opportunities in	I suggest some words are added to ensure DBC and the Cultural Forum supports tourism as well as stating the cultural facilities are strongly linked to tourism. It is the		

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													Dacorum. The nearest there is, is the Culural Forum and even they do not have anyone representing tourism. What is needed is a srong committment to support topurism as the glue that pulls arts, heritage, leisure and sport together which then drives inward investment in business and makes Dacorum a great place to live.	other way round. Tourism is strongly linked to the cultural assets of Dacorum and its people.		
610088	Mr Martin Hicks	HBRC				Paragraph	15.23	15.23	Objecting	No	b) Effective		15.23 <b>Cultural Facilities</b> . One of the critical factors affecting our Quality of Life is the increasing gap between communities and their environment. The connection between communities and the natural world and the countryside is declining rapidly and dangerously as there is increasingly little or no appreciation of the role of traditional farming and land management in sustaining the countryside. Whilst it's a nice place to go, we don't want to see too many cows there (ref visitors to Tring Park).  The engagement of communities with their surroundings is as yet not addressed. To help to raise the profile and importance of this connection.  this could be achieved in part by:  Increasing awareness and participation in countryside activities, local food provision and opportunities for cultural celebration.	Add:  Increasing awareness and participation in countryside activities, local food provision and opportunities for cultural celebration.	No, I do not wish to participate at the oral examination	
366491	Mr					Paragraph	15.24	15.24	Objecting	Yes	No	b) Effective	There has been an expectation of a new Performing Arts Venue as part	I suggest the words 'performing arts venue' is added after "a new		

