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	Brian Worrell											e	of the re-development of Hemel town centre, and it has been mentioned previously in this document. I suggest it is added to this paragraph as a key ambition. Otherwise, Hemel will need to rely on the Old Town Hall venue which is unsuitable to many arts related activities.	library, '		
488516	mr hugh siegle					Paragraph	15.24	15.24	Objecting	No	b) Effective		The Council highlights the benefits of cultural activities and it will 'support' the efforts of others to provide facilities but there is no leadership role outlined nor reference to past promises to replace the Pavillion with a new cultural and performing arts centre. The Council has to step up and take responsibility for improving cultural provision		No, I do not wish to participate at the oral examination	
484719	Mr. Roy Warren	Sport England				Social Infrastructure	CS23	Policy CS 23	Objecting	Yes	No	a) Justified	While the Social Infrastructure policy is welcomed because it seeks to protect existing infrastructure including sports facilities, encourages the provision new facilities and seeks provision from new development, the policy is considered unsound because the underlying evidence base (Dacorum Sport and Recreation Study (Indoor and Outdoor Facilities) 2006) in relation to sports facilities is not considered to be sufficiently robust to justify the proposals in the policy and is not considered to accord with Government guidance in PPG17 in relation to planning policies being supported by robust assessments and audits of local need. In summary, the evidence base is not considered to be sufficiently robust and would not therefore meet the 'justified' and 'consistent with National Policy' tests of soundness because the evidence base is no longer considered to be up-to-date as it was prepared over 5 years ago. Supply and demand data which informs sports facility needs	To address the concerns raised, in view of the issues raised above, the Dacorum Sport and Recreation Study for both indoor and outdoor facilities should be updated in order to provide a robust basis for supporting Policy CS23. It is advocated that the reviews of these studies accord with Sport England's "Towards a Level Playing Field" methodology which has become the established methodology for assessing playing pitch needs (and is referred to in the PPG17 companion guide) and the Fit for Purpose Framework (2010) for assessing sports facility assessments/strategies. This should ideally be undertaken before the core strategy is submitted for examination to ensure that the evidence base is up-to-date at the time the policy is examined. However, as an alternative, Sport England would be willing to accept a formal commitment to prepare revised assessments within an agreed	No, I do not wish to participate at the oral examination	

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													<p>assessments can change significantly over a 5 year period e.g. facilities opening/closing and sports clubs/teams starting-up/growing/closing. Sport England's advice is that a facility strategy/assessment requires reviewing after 3 years unless annual monitoring of supply and demand takes place (in which case a review after 5 years is acceptable). Furthermore, the strategic planning tools available have developed significantly over the last 5 years and more robust assessments can now be undertaken especially in relation to indoor facilities. As the data upon which the studies were based derives from 5-6 years ago and there is no evidence that the data used in the studies has been regularly reviewed since the study was published, this is not considered to be sufficiently robust to support policy CS23. This is likely to have consequential implications for the implementation of the policy e.g. the potential for securing developer contributions through planning obligations or CIL. or the ability to safeguard facilities threatened by development.</p> <p>While Sport England is supportive of the work undertaken as part of the Council's Facilities Improvement Strategy that is referred to in the supporting text to the policy, this strategy has not yet been published and does not currently form part of the LDF evidence base so it is difficult to confirm at this stage whether the assessment of needs contained in the strategy would be adequate for supporting the policy. In any case, this strategy focused on indoor sports facility needs and did not cover outdoor facilities such as</p>	<p>timescale if this was referred to in the core strategy. Sport England would be willing to provide further advice to the Council on this matter.</p> <p>Sport England would prefer to agree a mutually agreeable way forward with the Council before the core strategy is submitted than take an adversarial position at the Examination stage.</p>		

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													playing pitches. It is advised that DPDs (such as the Lichfield Core Strategy) where significant issues have been raised about the robustness of the open space evidence base have been found to not accord with the tests of soundness which has contributed to the DPDs being found to be unsound by Inspectors at examination. In Sport England's view, the out-of-date nature of the published evidence base is sufficient to make policy CS23 unsound and consequently this needs attention before the DPD is submitted for examination.			
214649	Mr John Greenaway	Jehovah's Witnesses				Social Infrastructure	CS23	Policy CS 23	Supporting	Yes	Yes		I commend Dacorum for their effort to include D1-h facilities in new developments and to make a genuine effort to retain D1 facilities. Of course when it comes to developers wishes they can be different to the desire of the Planners - this is the point where principle for what is right must take precedence !			
491185	Sheila Doyle	Friends of the Earth				Social Infrastructure	CS23	Policy CS 23	Objecting	No	No	a) Justified	Increase in housing will put more pressure on school places within Hemel. Herts CC is under obligation to ensure that all school children have a school place, can this be guaranteed under the plans? Any increase in travel distances to schools would lead to more car usage and, therefore, carbon extraction and more pollution. Any new schools that are required must be built on brownfield sites, and not on Greenbelt land.	Any new school required must be built on brownfield site not on Greenbelt land.	Yes, I wish to participate at the oral examination	prefer personal representation
607346	DEF Dacorum	Dacorum Environmental Forum				Social Infrastructure	CS23	Policy CS 23	Objecting		No	b) Effective	This is not sufficiently effective . Regarding school facilities , there is clear evidence that school children	Revert to the lower housing growth figure. See also our	No, I do not wish to participate	

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	Environmental Forum	Waste Group											<p>are having to travel from Berkhamsted to Gadebridge , Potten End and Tring This pressure will only increase if the higher housing numbers take place. That is why a lower figure would have been more sustainable. Hertfordshire County Council has a legal obligation to make sure that every child has a school place. Can this be guaranteed under this plan? See also our response to 1.4.</p> <p>Planning constraints on schools in the Green Belt should be no less robust than those for housing. Considerations should include visual intrusion, school run traffic and light pollution.</p> <p>Multiple use constraints on the specification of a performing arts centre should not be at the expense of providing facilities equivalent to the Milton Keynes theatre, which is able to attract national touring companies such as Glyndebourne.</p>	<p>response to 1.4.</p> <p>State that Planning constraints on schools in the Green Belt will be no less robust than those for housing. Considerations should include visual intrusion, school run traffic and light pollution.</p> <p>State that multiple use constraints on the specification of a performing arts centre will not be at the expense of providing facilities equivalent to the Milton Keynes theatre, which is able to attract national touring companies such as Glyndebourne.</p>	at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Social Infrastructure	POLICY CS 23	Policy CS 23	Supporting	Yes	Yes		BRAG would endorse Policy CS23. Social Infrastructure is under considerable pressure in Berkhamsted now. It is a fact that prospective developers cannot be asked to cater for existing deficiencies (DoE Circular 11/95 Conditions). Primary Care provision is being reviewed: this is an identified need within the local community. Current lack of schooling is acute and a review of the schooling system is underway. School buildings are regrettable in Green Belt but the Core Strategy is the appropriate stage in the development plan cycle		No, I do not wish to participate at the oral examination	

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													to argue the case. On the other hand their playing fields would do much to protect it for the foreseeable future. It is to be hoped that in future the Community Infrastructure Levy and s.106 monies will indeed be paid, or the designated buildings constructed: at a national level it is acknowledged that in the past s.106 agreements did not deliver.			
211055	Mr Matthew Wood	Hertfordshire County Council				Social Infrastructure	CS23	Policy CS 23	Supporting	Yes	Yes		<p>Representations were made previously * stating the need for a flexible approach to urban open land designations to assist in facilitating expansion of existing school sites. The wording in Policy CS23 stating that;</p> <p>The provision of new school facilities will be supported on Open Land and in defined zones and in the Green Belt' is fully supported'.</p> <p>The policy indicates that an existing site will be protected in community use unless it can be demonstrated that appropriate alternative provision has been made for an element of social infrastructure.</p> <p>If HCC's interpretation of the final sentence in the paragraph is correct , ie that the preference expressed in the policy for retention of a site for community service or use, is tempered by the fact that a site could be redeveloped if alternative provision has been made elsewhere, then HCC support the policy. This interpretation would protect viable community facilities, but also enable the recycling of land for appropriate alternative uses.The final paragraph of the policy, requiring all new development to contribute towards social infrastructure, and the fact that for larger developments, this may</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

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													<p>include land, is supported.</p> <p>Representations have been made previously identifying how appropriate education allocations in the Core Strategy or subsequent Site Allocations Development Plan Documents, can assist in the economics of delivery. It is worth repeating that reference in full here;</p> <p>Part III of the Land Compensation Act 1961 provides a mechanism for indicating the kind of development (if any) for which planning permission can be assumed by means of a 'certificate of appropriate alternative development'. The permissions indicated in a certificate can briefly be described as those with which an owner might reasonably have expected to sell his land in the open market if it had not been publicly acquired. Therefore, if X number sites are identified as being educational sites in</p> <p>the development plan and they are located in the Green Belt, then the alternative use is limited to those uses which are appropriate in the Green Belt. If however, the identification is simply as a school as part of a wider housing release, then one might argue that the alternative development would be residential and the site acquisition will be prohibitively more expensive.</p> <p>Such identification would equally apply to the economics of delivery of a new</p> <p>Household Waste Recycling Centre - and the necessity of making provision for relocation/enlargement of the existing Hemel Hempstead HWRC was identified at paragraphs</p>			assist DBC officers in proving the 'soundness' of the Core Strategy.

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													<p>4.43, 4.44 and 5.31 of our November 2010 representations.</p> <p>The Delivery Mechanism set out for policy CS23 is supported, particularly in respect of;</p> <ul style="list-style-type: none"> Identification of infrastructure planning requirements through the Site Allocation DPD Inclusion of appropriate requirements within any Development Management DPD. Masterplans for Strategic sites Partnership working with infrastructure providers including Children's Services and Hertfordshire Property at the County Council Implementation of the Infrastructure Delivery Plan <p>HCC officers particularly in Planning Obligations, Children's Services, the Waste Management Unit and Hertfordshire Property, would welcome continuation of the constructive partnership working to date. This will assist in identifying appropriate issues to be covered in the course of preparation of the above documents.</p>			
211055	Mr Matthew Wood	Hertfordshire County Council				Social Infrastructure	CS23	Policy CS 23	Supporting	Yes	Yes		HCC Children's Services colleagues have not identified that there is any requirement for reserve secondary school site allocations since it is considered that there is sufficient capacity and potential within existing schools to provide for additional secondary school places. The fact that Policy CS 23 has been amended to cater for the potential expansion of schools washed over		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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													<p>by open land designations fulfils that requirement. For example, this would enable consideration to be given to the expansion of all the secondary schools in Hemel Hempstead, as well as Tring Secondary. The situation with regard to Kings Langley Secondary and Ashlyns and their designation as Major Developed Sites within the Green Belt and the fact that those MDS boundaries could be amended to facilitate further development, has been noted above at 3.6 to 3.8 and 3.54. It is helpful.</p> <p>The situation with regard to potentially requiring additional secondary school site capacity could change in the event that St Albans City and District propose significant housing growth to the east of Hemel Hempstead. Again, HCC officers would welcome the opportunity of further tri partite discussions around this issue.</p>			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.
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Social Infrastructure	CS23	Policy CS 23	Objecting	No	No	a) Justified	<p>It is not Justified or Effective.</p> <p>Draft Policy CS23 in relation to social infrastructure provision is objected to on the specific point relating to the designation of education zones - where the Council do not appear to have any justification for why they have identified land for such purposes in these zones. At Land South of Berkhamsted for example, the Zone appears to be based on existing education uses. The policy is therefore not justified.</p> <p>It is considered that a flexible approach should be considered in planning both improvements and</p>	<p>For the reasons set out above, the following changes (as proposed deletions in strikethrough) are considered necessary in order to make the Core Strategy sound:</p> <p>Policy CS23: Social Infrastructure</p> <p>Social infrastructure, providing services and facilities to the community, will be encouraged.</p> <p>New infrastructure will:</p> <p>(a) be located to aid accessibility; and</p> <p>(b) provide for the multifunctional use of space.</p>	Yes, I wish to participate at the oral examination	

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													<p>new school provision in certain towns (to include Berkhamsted) which relates to actual needs and requirements at a local level and in consultation with the Local Education Authority (LEA). An approach that identifies zone boundaries is considered overly restrictive and does not allow for sufficient flexibility. For example, development proposals at Land to the south of Berkhamsted identify land for a new 2 form entry primary school just outside of the proposed Education Zone (an approach agreed with Hertfordshire County Council). The policy is therefore not effective.</p>	<p>The dual use of new and existing facilities will be promoted.</p> <p>The provision of new school facilities will be supported on Open Land and in defined zones in the Green Belt. Zones will be defined in the Green Belt where there is clear evidence of need: the effect of new building and activity on the countryside must, however, be minimised.</p> <p>Existing social infrastructure will be protected unless appropriate alternative provision is made, or satisfactory evidence is provided to prove the facility is no longer viable. The re-use of a building for an alternative social or community service or facility is preferred.</p> <p>All new development will be expected to contribute towards the provision of social infrastructure. For larger developments this may include land and/or buildings.</p>		
498429	Steve Baker	CPRE - The Hertfordshire Society				Social Infrastructure	CS23	Policy CS 23	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>CPRE Hertfordshire objects to the allocation of sites for development of new schools and dual use facilities in the Green Belt, unless evidence is provided to show that such provision cannot be made at existing or extended sites or in alternative non-Green Belt locations.</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 development of existing school sites for housing,</p>	<p>References to defined education zones within the Green Belt should be deleted and 'Facilities will not be permitted if they conflict with Green Belt objectives and purposes' added to the Policy.</p>	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.

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													is contrary to national Green Belt policy and is not justified by supporting evidence.			
611253	Mr B Moffitt	New Gospel Hall Trust	479603	Mr John Shephard	J & J Design	Social Infrastructure	CS23: Social Infrastructure	Policy CS 23	Objecting	Yes	No	b) Effective	<p>PPS12 advises that to be effective core strategies must be deliverable; flexible and able to be monitored. They must also ensure that partners who are essential to delivery including landowners and developers are signed up to the plan.</p> <p>In the case of Policy CS23, the Trust broadly welcomes the encouragement of social infrastructure, but considers that the policy is unduly prescriptive and lacking in flexibility by requiring multifunctional use of space and the dual use of new and existing facilities. These requirements are contrary to the ethos of the Brethrens Christian Fellowship and indeed other faith communities who generally require a single user in dedicated premises, unsuited to multifunctional or dual uses. This has been made clear to the Council and is acknowledged in the background study: 'Social and Community Facilities' (January 2006) at paragraph 7.2.8. Furthermore, representations were made by the Trust and others at the Consultation Draft stage as recorded in "Report for Consultation - Volume 6 Annex A". The word "shared" has been omitted from the supporting text at paragraph 15.14 in the Pre-Submission Core Strategy, but the policy wording remains.</p> <p>Although the Council has supported single user small scale facilities in several locations within the Borough, the proposed policy wording may well result in resistance to this in the future and</p>	<p>We request the following changes:</p> <p>a. Second paragraph - amend (b) to read:</p> <p>(b) may provide for the multifunctional use of space, where appropriate.</p> <p>b. Delete the third paragraph.</p>	Yes, I wish to participate at the oral examination	To assist the Inspector in reaching a clear understanding of the ethos of the brethren and the approach of other faith groups to sole user facilities, together with wider research on these issues and previous relevant appeal decisions.

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													thereby undermine the effectiveness of the delivery of further places of worship during the plan period for the Brethren and other faith communities. Multifunctional and dual use of premises is not a requirement of the draft NPPF which supports community facilities and local services including places of worship (see paragraph 126).			
211041	Ms Rose Freeman	The Theatres Trust				Social Infrastructure	CS23	Policy CS 23	Supporting	Yes	Yes		<p>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.</p> <p>Comments</p> <p>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 intended outcomes.</p> <p>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</i></p>		No, I do not wish to participate at the oral examination	

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													<p>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.</p> <p>We also find the document unnecessarily long and although it does not undermine the soundness of the CS, it obscures its key themes and entails repetition.</p>			
503254		Royal Mail	625562	Ms Lisa Bowden	BNP Paribas Real Estate	Social Infrastructure	CS23	Policy CS 23	Objecting	Yes	No		<p>This Policy states that all new development will be expected to contribute towards the provision of social infrastructure and that for larger developments this may include land and / or buildings.</p> <p>Royal Mail acknowledges that new development may need to contribute to the provision of social infrastructure. However, this should be subject to where there is an identified need, supported by the appropriate evidence, and which does not impact on the viability of a development.</p>	<p>Royal Mail therefore request that Policy CS23 explicitly states that the level of any contributions should be:</p> <p>Subject to viability and deliverability of the development; Justified in Circular 05/05 and regulation 122 of the Community Infrastructure Levy Regulations 2010 terms; and Subject to independent verification.</p>		
620322		West Herts College	620319	Ms Alison Tero	CBRE	Social Infrastructure	CS23	Policy CS 23	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified, effective and not consistent with national policy.</p> <p>WHC plays a significant role in contributing to the vitality and viability of Hemel Hempstead town centre. It is the College's intention to remain within the town centre if a viable redevelopment proposal can be secured. As such, WHC considers that reference should be made in Chapter 15: Meeting Community Needs – Education, to the need for WHC to deliver a new</p>		<p>Yes, I wish to participate at the oral examination</p>	<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>

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													<p>facility given the very poor condition of the existing campus in Hemel Hempstead, the preference being for the College to remain on its existing site if a viable solution can be secured.</p> <p>WHC generally supports policy CS23 for the provision of social infrastructure however WHC recommends that a more flexible approach is taken in the Core Strategy to alternative use or redevelopment of surplus/redundant land and facilities, particularly in town centres, to maximise the use of available brownfield land.</p> <p>WHC considers that the proposals for the intensification of existing social infrastructure sites and/or the provision of other uses on existing sites as 'enabling development' should be a material consideration where it can be shown that such uses would help deliver improved social infrastructure facilities in the borough.</p>			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.
633333	Mr Paul Harris	Dacorum Green Party				Social Infrastructure	CS23	Policy CS 23	Objecting	No	No	a) Justified	Regarding school facilities, there is clear evidence that school children are having to travel from Berkhamsted to Gadebridge, Potten End and Tring. This pressure will increase if the higher housing numbers take place. This is why a lower figure would have been more sustainable. Herts County Council is under obligation to make sure every child has a school place. Can this be guaranteed under these plans?	All future school building should be built on Brownfield sites only. Children travelling some distance to school from their home destination involves more care usage, increased air pollution and more carbon extraction. Hence the need for smaller increase in house numbers.	Yes, I wish to participate at the oral examination	I like to make a personal appearance.
610088	Mr Martin Hicks	HBRC				Enhancing the natural environment	Strategic Objectives	16	Objecting	No	No	b) Effective	The strategic Objectives should state	Insert: 'protect, maintain and enhance Dacorum's'	No, I do not wish to participate at the oral examination	

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													<p>protect, maintain and enhance Dacorum's'</p> <p>as this recognises and captures the need to <i>manage</i> the resource as well. Protection alone within a planning system is insufficient; and enhancement is not possible anyway without the means to deliver it. Therefore something that recognises the need to keep it going as well is essential - a fundamental issue relating to the green infrastructure / living landscapes approach. Our previous comments (28/7/10) advised <i>We consider that this should also include a statement which reflects suitable management, such as „To support management activities that actively contribute to delivery of environmental objectives‘.</i></p>			
223914	Mrs Nichola Mills					Enhancing the natural environment	Strategic Objectives	16	Supporting	Yes	Yes		Yes - I support the Strategic Objectives.		No, I do not wish to participate at the oral examination	
617246	Ms Janet Nuttall	Natural England				Enhancing the natural environment	Section 16	16	Objecting	Yes	No		Monitoring of wildlife sites, particularly statutory sites, should include consideration of changes in condition of the site as well as to its extent/area.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.1	16.1	Supporting	Yes	No	b) Effective	We support the Borough's recognition of and various references made to the <i>active management</i> of habitats, the countryside and the natural environment, which is necessary and important for the protection and enhancement of our semi-natural habitats, landscapes and biodiversity. This is apparent in the Vision statement, paragraph 16.1 and paragraph 26.14. It must be		No, I do not wish to participate at the oral examination	

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													ensured that the need for ongoing management of habitats, habitat features, Green Infrastructure assets etc, will be taken into account in planning and decision making, and in decisions relating to developer contributions.			
610088	Mr Martin Hicks	HBRC				Paragraph	16.2	16.2	Objecting	No	b) Effective	I believe the correct title for this landscape term is Chilterns National Character Area . As such its reference No. is 110. Alternatively Natural England have produced Natural Areas, which the Chilterns are No. 65. Although the boundary is the same it is anticipated that the emphasis on the broader 'Landscape' description is the more appropriate title. You may wish to confirm this with Herts Landscape Officer if you consider changing it.	Use term Chilterns National Character Area	No, I do not wish to participate at the oral examination		
617246	Ms Janet Nuttall	Natural England				Paragraph	Para 16.2	16.2	Supporting	Yes	Yes		Natural England is pleased to see the inclusion of a separate section and detailed discussion of landscape issues, including recognition of the national significance of the Chilterns AONB and the need to protect this at the local level.			
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	16.3	16.3	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	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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													meets on 8 th February 2012. Any further comments made at that 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 the recognition given to the importance of the Chilterns AONB and the AONB Management Plan in this paragraph.			
617246	Ms Janet Nuttall	Natural England				Paragraph	16.3	16.3	Objecting	No	No		The Core Strategy should also recognise the AONB as a locally and regionally important biodiversity and green infrastructure asset.			
610088	Mr Martin Hicks	HBRC				Map 2	Map 2	Map 2	Objecting	No	b) Effective		Map 2 purports to show principal landscape areas although it seems to be a mixture of AONB, 'Natural Area' (which therefore has the wrong boundary in the Vale) and the more local Landscape Character Assessment (as it highlights and names (for the purposes of the LCA) Boarscroft Vale). This is misleading. It mixes two very different scales of description and more locally fails to highlight obvious characteristics eg river valleys. The scarp is also wrong in that it omits the Aldbury Nowers scarp which links to Pitstone Hill in Bucks. As it stands, if a larger landscape typology is adopted, the flatlands of the Aylesbury Vale should be called that as well as their Natural (National) area equivalent (Bedfordshire and Cambridgeshire Claylands - No.88). This boundary is also not a river (as it is shown in	Select consistent landscape descriptions and make corrections as above.	No, I do not wish to participate at the oral examination	

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													blue). I consider this map should be consistent either with National or more Local landscape types and be shown accordingly. The HCC Landscape Officer may also have views on this matter. For a local plan it should be possible to show the more detailed Landscape Character Assessment areas, in addition to the more broad landscape character and designations (AONB). Why highlight Ivinghoe Beacon when it is some distance outside of the DBC boundary?			
617246	Ms Janet Nuttall	Natural England				Paragraph	16.4	16.4	Supporting	Yes	Yes		Natural England is pleased to see the inclusion of a separate section and detailed discussion of landscape issues, including recognition of the national significance of the Chilterns AONB and the need to protect this at the local level.			
610088	Mr Martin Hicks	HBRC				Paragraph	16.5	16.5	Objecting	No	No	b) Effective	I consider that the Landscape Character Areas should be shown on a map, or if not and in any event, be referenced as to where they may be found. They must be accessible if they are to be used.	Show or reference LCAs.	No, I do not wish to participate at the oral examination	
617246	Ms Janet Nuttall	Natural England				Paragraph	16.5	16.5	Objecting	No	No		However, we would again suggest that reference is made in the supporting text to the need for relevant development to be subject to best practice landscape and visual assessment and for suitable mitigation to be provided where appropriate.			
211503	Mr Colin	Chilterns Conservation Board				Paragraph	16.10	16.10	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		No, I do not wish to participate at the oral	

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	White												<p>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 to the purpose of conserving and</p>		examination	

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													<p>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 8th 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 the recognition given to the importance of the Chilterns AONB and the AONB Management Plan in this paragraph.</p> <p>The text is supported as drafted.</p>			
610088	Mr Martin Hicks	HBRC				Paragraph	16.11	16.11	Objecting	No	b) Effective		The function of GI with respect to biodiversity is not fully reflected in the description.	I advise that the following is added to this paragraph: area. It has an important role in enabling biodiversity to flourish and move through the landscape at different scales'.	No, I do not wish to participate at the oral examination	
211503	Mr	Chilterns Conservatio				Paragraph	16.11	16.11	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											<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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618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.11	16.11	Supporting	Yes	Yes		We support the reference made in paragraphs 16.10 to 16.12 to the range of benefits of GreenInfrastructure.		No, I do not wish to participate at the oral examination	
211503	Mr Colin	Chilterns Conservation Board				Paragraph	16.12	16.12	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		No, I do not wish to participate at the oral	

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	White												<p>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 to the purpose of conserving and</p>		examination	

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618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.12	16.12	Supporting	Yes	Yes		We support the reference made in paragraphs 16.10 to 16.12 to the range of benefits of GreenInfrastructure.		No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	16.13	16.13	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		No, I do not wish to participate at the oral examination	

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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 8th 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 the recognition given to the importance of the Chilterns AONB and the AONB Management Plan in this paragraph.</p> <p>The text is supported as drafted.</p>				
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.13	16.13	Supporting	Yes	Yes		We support the reference made in paragraphs 16.10 to 16.12 to the range of benefits of GreenInfrastructure.		No, I do not wish to participate at the oral examination	
610088	Mr Martin Hicks	HBRC				Paragraph	16.14	16.14	Objecting	No	b) Effective	One of the 'life support systems' that GI is supposed to contribute to is as a 'productive' land use, ie producing food or other resources from the land. This is obviously a fundamental life support system. Farming and forestry - whilst not	Add farming and forestry to the list of GI life support systems.	No, I do not wish to participate at the oral examination		

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													necessarily always as ecologically benign as we might wish - are still essential aspects of land use which should also be encouraged to improve their broader environmental services. But in respect of providing food they should be highlighted as an integral part of GI - otherwise pressures for other land uses will change many aspects of the land's character, function and ecological services. This is also reflected within the NPPF.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.14	16.14	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> <p>Paragraph 16.13. We accept the differentiation of levels in the GI network (high level, vs. detailed borough wide, vs. settlement strategies) as this may be a useful tool to focus efforts and set priorities at different spatial and temporal scales. However, it is necessary to appreciate that the detail is important to the effective protection and enhancement of the high level assets, and that the local links and sites are critical to making the whole landscape permeable to wildlife and effectively deliver ecosystem services.</p> <p>We draw your attention to the citation in paragraphs 16.13 and 16.14 of the Green Infrastructure</p>		No, I do not wish to participate at the oral examination	

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													Strategy. We seek clarification as to whether this refers to the <i>Dacorum Borough Green Infrastructure Plan</i> (Land Use Consultants, 2011) or to another document.			
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	16.14	16.14	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</p>		No, I do not wish to participate at the oral examination	

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													<p>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 8th 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 the recognition given to the importance of the Chilterns AONB and the AONB Management Plan in this paragraph.</p> <p>The text is supported as drafted.</p>			
617246	Ms Janet	Natural England				Paragraph	16.15	16.15	Objecting	Yes	Yes		It is disappointing that the section on GI does not really discuss levels of GI deprivation or ANGSt			

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	Nuttall												standards. Natural England has commissioned a series of county-level reports to map the provision of accessible natural greenspace (ANGSt) by local authority; the report for Hertfordshire identifies that at the 100ha+/5km level Dacorum performs below the county average, this is in part because the eastern half of Hemel Hempstead is unprovisioned - the Core Strategy should discuss and seek to address this through development. We would also suggest reference is made to secure long term management of GI sites, through developer funding or adoptions by a body such as the local authority or local wildlife trust.			
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	16.15	16.15	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,</p>		No, I do not wish to participate at the oral examination	

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													<p>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 8th 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</p>			

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													<p>AONB and the need to conserve and enhance its natural beauty.</p> <p>The Board welcomes the recognition given to the importance of the Chilterns AONB and the AONB Management Plan in this paragraph.</p> <p>The text is supported as drafted.</p>			
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	16.16	16.16	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</p>		No, I do not wish to participate at the oral examination	

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610088	Mr Martin	HBRC				Paragraph	16.17	16.17	Objecting	No	b) Effective	Given that GI does - in theory - highlight a productive land use, should not the Core Strategy also reflect the Dacorum Local Food	Include the emrging Dacorum Local Food Initiative as a reference source for GI	No, I do not wish to participate at the oral		

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	Hicks												Initiative? Whilst this is not a planning document, it does include a strategy which aims to highlight many areas pertinent to local food delivery and as such, provides an important approach to seeking to secure and promote a local food culture. This in turn should also contribute to helping to sustain and encourage land management and enterprises which help to deliver the planning objectives of maintaining countryside quality. It should at least be reflected within the GI Strategy and Action Plan. Thus it represents an important delivery mechanism.		examination	
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	16.17	16.17	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</p>		No, I do not wish to participate at the oral examination	

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													The Board welcomes the recognition given to the importance of the Chilterns AONB and the AONB Management Plan in this paragraph. The text is supported as drafted.			
610088	Mr Martin Hicks	HBRC					Map 3	Map 3	Objecting	No	b) Effective		Cartographic inconsistencies: SAC (Chiltern Beechwoods) Key and Map do not match. Wendover Woods Key and Map do not match; Also, if Wendover Woods are shown on the map by text, why not Ashridge or Ivinghoe? All are major, publicly accessible recreation sites.	Address map and key inconsistencies.	No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board					Map 3	Map 3	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 the public of the special qualities of the area of outstanding natural beauty 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	Include the AONB on Map 3.	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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</p>			

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													<p>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 the recognition given to the importance of the Chilterns AONB and the AONB Management Plan in this paragraph.</p> <p>Though this is not objected to the Board considers that it would be useful if the map also included the AONB to show how important it is to the overall Green Infrastructure network within the Borough.</p>			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills		Map 3	Map 3	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is considered that the draft Policy CS26 in relation to Green Infrastructure would be a more effective policy if it included acknowledgement of new developments, in particular that relating to new development proposed at Land South of Berkhamsted, as a contributor to the borough and town's green infrastructure network.</p> <p>The development proposals will create important, new green infrastructure which needs to be acknowledged in the CS Plan and as part of Map 3 of the Plan. GUI has submitted as part of their formal representation and as part of the Planning Document (at Appendix 6) a Landscape Enhancement Assessment in connection with new development south of the town, prepared by Churchman Associates.</p>	On the above basis, it is recommended that Map 3 is amended to reflect the new green infrastructure created through the proposals south of Berkhamsted.	Yes, I wish to participate at the oral examination	It is necessary as the above relates to material changes to the Core Strategy Plan.

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													<p>This assessment indicates that a green buffer is a key part of these proposals, serving a number of inter-related functions. It explains that it would firstly be engineered to mitigate noise from the A41, establishing a zone to the north which will experience more acceptable levels of road noise, below the recommended threshold for residential areas. In part this is due to the incorporation of a bund or sound screen in those sections of the site where the A41 is elevated or at grade.</p> <p>The green buffer is proposed to extend well beyond the extent of the new housing, it is a major piece of green infrastructure running along the southern edge of the town from the woodland of Long Green in the east to Dennys Lane in the west. The buffer and its mound will provide valuable habitat, supporting new plant and animal communities, including red kite, which are well suited to this type of landscape.</p> <p>The key benefit of this linked green space is that it binds together a number of small - medium sized habitats such as Long Green and Brickhill Green to form a more self sustaining and robust set of communities and a series of linked wildlife corridors. Swing Gate Lane for example has been identified</p> <p>as an important bat commuting route connecting the valley bottom and the town with Long Green and the wider rural context.</p> <p>The green buffer also provides a diverse range of recreational and leisure activities from dog walking and jogging, through play and formalised team sports to more</p>			

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													<p>individual or extreme sporting pursuits such as scrambling , bmx or skateboarding. It is proposed that this buffer, which ranges in width from 20 metres to 120 metres, will retain a largely natural character, although there will be pockets of more formalised landscape within it. This slightly looser character provides an ideal setting for more natural play activities, something which is heavily promoted by Dacorum's Core Strategy. The aim is in effect to create a new green asset along the town's southern edge, and to provide a green space which sits somewhere between town park and common land.</p> <p>Lastly, the green buffer offers an enhanced means of access and communication both east - west along the southern edge of the town, but also north - south from the town centre out into the wider network of tracks, paths and bridleways. This area has historically been a point of convergence for a number of pathways linking the town with the wider agricultural landscape. Unfortunately many of these links were severed by the A41, making access to the countryside to the south somewhat tortuous. Although there are a total of six existing underpasses or bridges over the A41 within this 2.5km stretch, levels of use would appear to be low due to the uninviting nature of the individual connections and the lack of connectivity between the six crossing points on the north side of the road</p> <p>corridor.</p> <p>This proposal will deliver that link, from Long Green down to Brickhill Green and will be able to achieve a</p>			

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													<p>new east - west pathway. Land between Brickhill Cemetery and Dennys Lane GUI is only part owned so the continuation of the route will need third party agreement but as the areas not in GUI ownership are either in public ownership (Kingshill cemetery) or quasi government ownership, it is concluded that the green buffer and the wildlife corridors are "missing links" to the town and borough's green</p> <p>infrastructure network and for this reason it is recommended that both aspects are illustrated on draft Map 3 of the CS.</p>			
502874	Mr Chris Bearton	Hertfordshire County Council					Map 3	Map 3	Objecting	No	No		<p>There are a number of ways in which the approach taken to Green Infrastructure could be made more sound. The main points are;</p> <p>The Chilterns AONB should be referred to as a GI asset for the retention, provision and enhancement of Green Infrastructure;</p> <p>Encouragement should be given to urban greening in Hemel Hempstead;</p> <p>Provision should be made to secure CIL monies to support implementation of the Strategic and Borough GI plan.</p> <p><u>Omission of GI links and assets</u></p>			

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													<p>4.2 It is perhaps inadvertent, but there are some inconsistencies. The high level GI network for Dacorum (Map 3) omits some strategic GI links and assets identified in the SHiP and in the RSS. In order to be most sound and demonstrate sufficient co-operation with neighbouring authorities and strategic documents, these links and assets need to be included as part of the network, and should thus be included in the Dacorum Core Strategy. (In some cases links are included but appear to be misdrawn).</p> <p><i>The omission of the Chilterns AONB</i></p> <p>4.3 The Chilterns AONB was identified in the RSS as an " Asset of regional significance for the retention, provision and enhancement of green infrastructure." It is identified as an existing element as part of the SHiP and shown as a Strategic Regional & Sub-Regional GI asset in the GIP on diagram 3.1. It is also identified in the Buckinghamshire GI Strategy, yet is not marked on the High Level Green Infrastructure Network map, nor directly referred to in Policy CS26. While it may be reasonable to deal with the AONB in a separate policy, it is strongly suggested the AONB should at least be referred to in CS26 and/or its supporting text, or alternatively, in the text for CS24, have its strategic GI status identified.</p> <p><i>The omission of GI heritage conservation and enhancement of Hemel Hempstead</i></p> <p>4.4 It is recognised that the Dacorum 2008 Open Space Study concluded that Hemel was generally</p>			

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													<p>well provided for in terms of <i>spaces</i> (allotments excepted) and that most residents are broadly satisfied with this. But GI is concerned with multifunctionality, and networks as well as equity. In the SHiP, therefore, Hemel Hempstead is one of a number of settlements where urban greening is a strategic priority. This is in the context of relatively high levels of deprivation in H/h East and the anticipation of growth pressures. Hemel is thus included in Strategic Project 4 which seeks, amongst other things, to:</p> <p><i>celebrate & promote the unique urban GI heritage of as well as providing enhanced functionality of urban, greenspace, through appropriate management & new tree planting;</i></p> <p><i>Enhance urban biodiversity;</i></p> <p><i>secure urban greening for climate change adaptation;</i></p> <p><i>encourage sustainable living options, local food production/allotments, community gardens & orchards; and</i></p> <p><i>secure positive green urban interfaces - enhancement of peri urban greenspace & through landscape mitigation</i></p> <p>The Dacorum GIP specifically supports and expands the need for this urban greening in Hemel, identifying Project 7 to address this.</p> <p>4.5 And these documents follow on from the Dacorum's Urban Nature Conservation Study 2006 which noted that Hemel was deficient in Local Nature Reserves, the distribution of Wildlife Sites with public access was rather uneven</p>			

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													<p>and that the principal ecological routes through the town need enhancing as well as consideration being given to smaller scale ecological features and the contribution gardens make to Wildspace.</p> <p>It is thus strongly suggested that a Hemel Hempstead GI initiative is included on Map 3.</p> <p><u>The lack of recognition of strategic routes</u></p> <p>4.6 A number of strategic links (SHiP) have been omitted from Map 3. The Ridgeway (national trail), Icknield Way Regional path and Chiltern Way, however, are particularly well-established strategic GI routes which are not shown as part of the High Level Green Infrastructure Network on Map 3. These routes are recognised in the Dacorum GIP and the SHiP, are identified in Map 10 of the Green Infrastructure background Paper 2010. Furthermore, at a Green Infrastructure meeting arranged by LGIG meeting on 9th November 2011, it was agreed to support work on mending severance on Strategic GI routes, including at two points on the Icknield Way. The maps below overlaying the strategic GI links in purple over Map 3, illustrate the problem here:</p> <p>Ridgeway & Icknield Way Strategic Link (highlighted in yellow)</p> <p>Chiltern way Strategic Link (highlighted in yellow)</p> <p><u>Apparent mis-drawing of the Tring</u></p>			

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													<p><u>to Wendover Woods link</u></p> <p>4.7 The link shown on Map 3 appears misdrawn, not relating to the GIP and Bucks GI Plan. Please see the following comparisons:</p> <p>Tring-Wendover woods link from Dacorum GIP (double green line)</p> <p>4.8 Aerial Photos showing same link in relation to woodland network confirming the line in the Dacorum GIP is correctly mapped</p> <p>4.9 However the Tring-Wendover link as shown on Map 3 is drawn (dashed green line) approximately 1 mile to the north</p> <p>4.10 The drawing below shows the strategic links (in black dashed) in relation to an extract of the Buckinghamshire GI Plan (where networks are rendered as a green tone), reinforcing the impression that the Tring to Wendover link has been misdrawn</p> <p><u>The possible omission of Tring urban wildlife corridors</u></p> <p>4.11 This is perhaps an area where Dacorum has taken a decided view. However this point is raised in case it is an omission.</p> <p>4.12 It is understood that the urban nature conservation study has been used in addition to the GI plans in identifying some additional nature conservation links. The outputs of this are quoted as Map 5 in the Green Infrastructure Background Paper 2010. This urban work may well have some value for identifying additional links. However it seems that Tring is not dealt with even-</p>			

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													<p>handedly when compared with Hemel and Berkhamsted in terms of carry-through of urban nature conservation corridors from the studies. See below: The brown lines which are not associated with black lines on the Aerial photo of Tring below show candidate urban wildlife corridors that have not been captured in Map 3.</p> <p><u>Comments made in Para 16:17 about geological assets</u></p> <p>4.13 The documents listed in the paragraph 'A preferred approach to GI' above do not support any particular weight (for example the use of the word 'key') being attached to 'geological' resources in Para 16.17. There is a historical association between the study of rocks/fossils and species by natural historians, but discussion of geological conservation is best done outside <i>green</i> infrastructure to avoid future confusion.</p> <p><u>The inclusion of a strategic link without supporting evidence base</u></p> <p>4.14 It could be that there is good reason to include it on Map 3 (and it does follow a line of woodland Wildlife Sites), however the justification for the strategic link circled in mauve on the map below being included (in preference to other omitted links) is not clear and it would be worth checking.</p>			
617246	Ms Janet Nuttall	Natural England					Map 3	Map 3	Objecting	Yes	Yes		However, it is disappointing that statutory conservation sites including SSSIs and the Chilterns Beechwoods SAC are not given more detailed discussion. These sites form a valuable part of the green infrastructure network of the borough and contribute significantly			

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													to local landscape, biodiversity and access. It would be helpful if these were depicted on Map 3 - the Chilterns Beechwoods SAC is included in the key but the site boundary does not appear to be included on the map.			
610088	Mr Martin Hicks	HBRC				Paragraph	16.18	16.18	Objecting	No	b) Effective	Biodiversity and Geodiversity resources are 'fundamental' components of GI; they existed long before the concept of GI came about. Given that there are no specific biodiversity or geodiversity policies - they are included within 'Green Infrastructure' - their relative contribution must be properly recognised.	Change 'key' to 'fundamental' (or 'critical' or 'essential').	No, I do not wish to participate at the oral examination		
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	16.18	16.18	Objecting	No	No	The documents listed in the paragraph 'A preferred approach to GI' above do not support any particular weight (for example the use of the word 'key') being attached to 'geological' resources in Para 16.17. There is a historical association between the study of rocks/fossils and species by natural historians, but discussion of geological conservation is best done outside <i>green</i> infrastructure to avoid future confusion.				
617246	Ms Janet Nuttall	Natural England				Paragraph	16.18	16.18	Objecting	Yes	No	However, it is disappointing that statutory conservation sites including SSSIs and the Chilterns Beechwoods SAC are not given more detailed discussion. These sites form a valuable part of the green infrastructure network of the borough and contribute significantly to local landscape, biodiversity and access. It would be helpful if these were depicted on Map 3 - the Chilterns Beechwoods SAC is included in the key but the site boundary does not appear to be included on the map. Reference should be made to the statutory protection afforded to these sites				

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													and the requirement for appropriate assessment and mitigation as part of development.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.18	16.18	Supporting	Yes	Yes		We support the reference made in paragraph 16.17 to the importance of biodiversity resource as a key component in Green Infrastructure, and in paragraph 16.18 the specific reference to Wildlife Sites, which are a critical element in Dacorum's GI network. It would be beneficial to mention in the text that Local Wildlife Sites (variably known also as County Wildlife Sites, Wildlife Sites and Local Sites) are a non-statutory designation, and only currently have protection through the planning system. It will be necessary to ensure that Local Wildlife Sites continue to be protected into the future, through the Local Plan, given that the current protection at national level (via PPS9) may be removed, relaxed or made less than explicit in the emerging NPPF.		No, I do not wish to participate at the oral examination	
610088	Mr Martin Hicks	HBRC					Fig 15	Figure 15	Objecting	No	c)	Consistent with national policy	Fig 15 could be considered, strictly speaking, incorrect. PPS9, Circular 06/2005 and the emerging NPPF recognise three principal distinctions of hierarchy: international national local (and regional) The first two include statutory and formal designations. If the name of the SAC is noted, consideration should be given to listing the eight SSSIs that are found within the borough. RIGGS are in effect local - being driven by recognition at the county level, but some Govt documents reflect the Regional part of the RIGGS title. They are essentially the	Consider modifying the Figure to reflect the three principle tiers.	No, I do not wish to participate at the oral examination	

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													<p>geological equivalent of Wildlife Sites (called Local Sites by DEFRA, formerly also Sites of Importance for Nature Conservation). Both are non-statutory and would be considered 'local' in a three-tier hierarchy.</p> <p>Key Biodiversity Areas were originally recognised by the local BAP and therefore identified at the County level, often reflecting an amalgamation of a range of sites where they are closely linked or are particularly distinctive in character or size. To date they are not officially recognised in Govt guidance but are an important statement of larger area value.</p> <p>Local Nature Reserves could be any of these sites, potentially from international to local if the LPA had a legal interest in the land and were minded to submit a site for approval from NE. The primary criteria is a local authority's legal interest in the land but they are also statutory in that they are identified by means of a formal, legal designation. However they are normally considered within a 'local' context, as distinct from 'national' nature reserves, of which Dacorum does not have any.</p> <p>Other nature reserves - eg of the Wildlife Trust or another body, can also be an SSSI or a Wildlife Site, so reflecting a range of importance.</p> <p>Should DBC retain its current hierarchy, the local importance at the bottom should be identified by 'informal designations' as these can be varied and inconsistent, eg wildlife corridor, Wildspace (as in the Urban Study). There are opportunities to reflect such</p>			

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													importance elsewhere within the plan.			
610088	Mr Martin Hicks	HBRC				Paragraph	16.19	16.19	Objecting	No	b) Effective		Wildlife Sites have now been removed from all biological SSSIs in Hertfordshire in order to clarify the recording units within the LRC database and better understand statistics on statutory and non-statutory sites. Therefore there is now no overlap in designations, although Little Heath Pit is a geological SSSI currently within a Wildlife Site - although this may change pending future survey work.	Remove 'some of which overlap with higher designations'.	No, I do not wish to participate at the oral examination	
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.19	16.19	Supporting	Yes	Yes		We support the reference made in paragraph 16.17 to the importance of biodiversity resource as a key component in Green Infrastructure, and in paragraph 16.18 the specific reference to Wildlife Sites, which are a critical element in Dacorum's GI network. It would be beneficial to mention in the text that Local Wildlife Sites (variably known also as County Wildlife Sites, Wildlife Sites and Local Sites) are a non-statutory designation, and only currently have protection through the planning system. It will be necessary to ensure that Local Wildlife Sites continue to be protected into the future, through the Local Plan, given that the current protection at national level (via PPS9) may be removed, relaxed or made less than explicit in the emerging NPPF.		No, I do not wish to participate at the oral examination	
610088	Mr Martin Hicks	HBRC				Paragraph	16.20	16.20	Objecting	No	b) Effective		The examples of ecologically important features could be better described, as could the low flow issue.	I suggest the following rewording: 'Larger scale features such as river valleys, chalk streams, the Grand Union Canal, ancient and semi-natural woodland, grasslands and other local green spaces within towns and villages are collectively very significant and need protection, along with smaller features including	No, I do not wish to participate at the oral examination	

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														orchards, veteran trees,important hedges and roadside verges. Many of these areas support priority habitats identified by the national and local biodiversity action plans.' Opportunities....initiatives. 'Improved management of the water resource and restoration of seasonal flows to the chalk streams which suffer from over-abstraction will be critical.'		
4885 16	mr hugh siegle					Paragraph	16.20	16.20	Objecting	No	b) Effective		My objection to this particular policy is in relation to the Borough's chalk streams and water supplies and how they are to be protected given the planned growth in employment and residents. How are water resources to be managed?. They are already under pressure. The Gade is suffering from water extraction to serve Hemel. The Bullbourne is dry in parts and as it is spring fed, indicates the aquifer cannot cope with the level of water extraction. Likewise the Grand Union canal has low water levels , and these factors cannot be dismissed as one-off instances due to adverse weather conditions. It is also reported (7/12/11) that Veolia are to sell their local water supply interests. Development in the Borough should be restricted until alternative sources of domestic water supply are provided, which will also give the aquifers time to recover		No, I do not wish to participate at the oral examination	
6188 73	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.20	16.20	Supporting	Yes	Yes		We support the recognition that not all features of value area formally designated and that these are still important and in need of protection (paragraph 16.19). We strongly support the reference to chalk streams and the focus on water resource management and		No, I do not wish to participate at the oral examination	

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													restoration of natural flows (paragraph 16.19). Chalk rivers are internationally important habitats and a key part of Dacorum's habitat diversity, which should be a priority for protection and restoration. It will be critical to take an holistic and integrated approach to this, tackling abstraction rates and water use efficiency, water quality issues, as well as restoring river systems to their natural state.			
610088	Mr Martin Hicks	HBRC				Paragraph	16.21	16.21	Objecting	No	b) Effective	<p>This paragraph should mention the potential for 'living landscape' projects to help deliver a more joined-up network, but this will only happen by influencing land management, which is not easy. That is why the local Food perspective should be mentioned within the Core Strategy.</p> <p>The second sentence could be more effectively constructed.</p> <p>I am not sure that habitat fragmentation is particularly bad in the southern part of the Borough, given the presence of commons and the Chess Valley. I suggest it is worst in the eastern side generally, north of Hemel Hempstead given the predominance of larger, arable fields around Gaddesden Row, Flamstead and Markyate.</p>	<p>Re word: ...addressed. ' Living Landscape projects will help to encourage land management on a largerscale. Habitats have become increasingly isolated or small making them vulnerable to a wide range of factors such as spray drift, lack of management, disturbance, structural diversity and connectivity which reduces movement between sites. For these reasons they are also less robust in their resilience to extreme weather events or impacts of climate change'.</p> <p>Remove 'southern' from the description of habitat fragmentation.</p>	No, I do not wish to participate at the oral examination		
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.21	16.21	Supporting	Yes	Yes		We support the reference in paragraph 16.20 to habitat fragmentation and the Council's intention to address this issue. This will be critical if the ecological network is to be protected into the future.		No, I do not wish to participate at the oral examination	
618873	Miss Odette	Herts and Middlesex Wildlife				Paragraph	16.22	16.22	Objecting	Yes	No	b) Effective	Whilst we support the recognition and reference made to Key Biodiversity Areas (paragraph	Whilst we support the recognition and reference made to Key Biodiversity Areas (paragraph	No, I do not wish to participate	

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	Carter	Trust											16.21), we recommend that this reference be expanded so as to encompass any landscape-scale conservation areas (ecological restoration zones, Nature Improvement Areas etc), as may be defined by the Hertfordshire Local Nature Partnership. This will add flexibility to the Core Strategy and help to ensure that the Core Strategy continues to be effective and relevant in the area of nature conservation, which is currently undergoing change both nationally and locally. HMWT is embarking on work to develop a Living Landscapes Strategy for Hertfordshire, which is likely to output new information, such as habitat opportunity maps. These outputs will be a useful addition and update to the Hertfordshire BAP and districts' Habitat Inventories, to direct future efforts and set out priorities for landscape-scale nature conservation and habitat restoration in the County.	16.21), we recommend that this reference be expanded so as to encompass any landscape-scale conservation areas (ecological restoration zones, Nature Improvement Areas etc), as may be defined by the Hertfordshire Local Nature Partnership.	at the oral examination	
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.23	16.23	Objecting	Yes	No	b) Effective	Paragraph 16.22. We support the concept of using a Sustainability Offset Fund to support improvement to habitats and ecological networks, but it is important that this supports other habitats besides woodlands and tree planting. Grasslands, wetlands and chalk rivers, for instance, are important elements in the borough's landscape and ecological network, important for their wildlife value but also in the provision of ecosystem services. Please also see our later comments on the Sustainability Offset Fund, referring to paragraph 18.23-18.24. Paragraph 16.22 should be altered to read "The Sustainability Offset Fund will help support habitat improvement, creation and restoration, and provide additional tree and woodland planting where	Clarification needed over Sustainability Offset Fund. Paragraph 16.22 should be altered to read "The Sustainability Offset Fund will help support habitat improvement, creation and restoration, and provide additional tree and woodland planting where this is appropriate, to extend and supplement existing green corridors and to reinforce existing landscape belts".	No, I do not wish to participate at the oral examination	

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													this is appropriate, to extend and supplement existing green corridors and to reinforce existing landscape belts".			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	16.24	16.24	Objecting	Yes	No	b) Effective	Regardless of new developments in nature conservation, the Local BAP will continue to be an important tool in protecting and enhancing the ecological network in Herts. We therefore support reference to HBAP targets and Chilterns AONB Management Plan targets and the Borough's commitment to support monitoring and information sharing (16.23). We would however request a commitment to support the development and implementation of other initiatives in Herts, such as Nature Improvement Areas and other outcomes of the Local Nature Partnership.	Paragraph 16.23, alongside the commitments to the Herts BAP, we would request a commitment to support the development and implementation of other initiatives in Herts, such as Nature Improvement Areas and other outcomes of the Local Nature Partnership.	No, I do not wish to participate at the oral examination	
610088	Mr Martin Hicks	HBRC				Paragraph	16.25	16.25	Objecting		No	b) Effective	It is not now true to say geological conservation has been less researched. A major book on the Geology of Hertfordshire was published by the Herts Natural History Society in 2010, providing an up to date detailed review of Hertfordshire's geology, geomorphology and landscape, written by national and local experts. There are also now <i>four</i> RIGGS sites in Dacorum - the new ones are Tring Park and the Bourne Gutter , both identified for the valuable interpretation of their geomorphological characteristics. HBRC have informed DBC of these (indeed suggested their inclusion) and supplied appropriate boundary GIS layers.	Re-word: 'The geology of Hertfordshire has been formally described in a recent mjr publication. There are four Regionally Important Geological and Geomorphological (RIGGs) sites within the borough:- pingos on Boxmoor puddingstone boulders at Castle Hill, Berkhamsted Bourne Gutter winterbourne and hydrology, Bourne End Tring Park dry valley geomorphology, Tring.	No, I do not wish to participate at the oral examination	
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	The Chilterns Area of Outstanding Natural Beauty	CS24	Policy CS 24	Supporting	Yes	Yes					
6172	Ms	Natural				The Chilterns	CS24	Policy	Supporti	Ye	Ye		We welcome the inclusion of a			

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46	Janet Nuttall	England				Area of Outstanding Natural Beauty		CS 24	ng	s	s		separate policy CS24 - the Chilterns AONB - which seeks to conserve the special qualities of this nationally important landscape, including the requirement for development to have regard to the Chilterns Conservation Board's Management Plan.			
211503	Mr Colin White	Chilterns Conservation Board				The Chilterns Area of Outstanding Natural Beauty	CS24	Policy CS 24	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</p>	Add 'and enhanced' at the end of line 2.	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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>Policy CS24 deals with the Chilterns AONB. Whilst the policy is generally welcomed and supported the Board considers that a small amendment is required in order to ensure compliance with the National Parks and Access to the Countryside Act 1949, the Countryside and Rights of</p>			

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													Way Act 2000 and Planning Policy Statement 7. The Board considers that the first paragraph should state that 'the special qualities of the Chilterns Area of Outstanding Natural Beauty will be conserved and enhanced'.			
610088	Mr Martin Hicks	HBRC				Landscape Character	CS 25	Policy CS 25	Objecting	No	b) Effective	In respect of Policy CS25 I am unclear as to how the statement 'All development will help conserve and enhance Dacorum's natural ... landscape' can apply as clearly some proposals eg telecommunications towers, horse menages, floodlights, golf courses and clubhouses etc all impose alien features within the landscape and can alter the local ecology - say from grassland to an artificial surface. However, these all may be acceptable in planning terms - indeed, all such features have been approved in Dacorum. Perhaps a better aim would be to 'Limit or minimise the impact of harmful development on.....and seek to conserve or contribute to ...where possible'. This is what I advised previously.	Re-word: Proposals will be assessed for their impact on landscape features to ensure that they limit or minimise the impact of harmful development and seek to conserve or contribute to the prevailing landscape quality, character and condition where possible , taking full account of the Dacorum Landscape Character Assessment, Historic Landscape Characterisation and advice contained within the Hertfordshire Historic Environment Record.	No, I do not wish to participate at the oral examination		
211503	Mr Colin White	Chilterns Conservation Board				Landscape Character	CS25	Policy CS 25	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			

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													<p>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 meets on 8th February 2012. Any</p>			

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													<p>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>			
610088	Mr Martin Hicks	HBRC				Green Infrastructure	Policy CS 26	Policy CS 26	Objecting	No	a) Justified	<p>Policy CS26 should be titled Biodiversity and Green Infrastructure, given that GI is a broader topic. 'Biodiversity and Green infrastructure' are also referred to within the NPPF para 167. Consistent with NPPF it should also:</p> <p>Seek to support the biological record in order that up-to-date information on ecology and networks can be identified and mapped, including designated sites and areas identified for habitat restoration and creation Support monitoring of biodiversity indicators Aim to prevent harm to geological conservation interests.</p> <p>I am not clear to what 'a greater range of uses in urban green spaces' means; there is no reference to this within the explanatory text and if this encourages more formal recreation - a laudable objective nonetheless - it could well lead to conflict with biodiversity aims, at least locally.</p>	<p>Re-word policy: Biodiversity and Green Infrastructure</p> <p>Add:</p> <p>Seek to support the biological record in order that up-to-date information on ecology and networks can be identified and mapped, including designated sites and areas identified for habitat restoration and creation Support monitoring of biodiversity indicators Aim to prevent harm to geological conservation interests.</p>	No, I do not wish to participate at the oral examination		

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502874	Mr Chris Bearton	Hertfordshire County Council				Green Infrastructure	CS26	Policy CS 26	Objecting	No	No		The Chilterns AONB was identified in the RSS as an "Asset of regional significance for the retention, provision and enhancement of green infrastructure." It is identified as an existing element as part of the SHiP and shown as a Strategic Regional & Sub-Regional GI asset in the GIP on diagram 3.1. It is also identified in the Buckinghamshire GI Strategy, yet is not marked on the High Level Green Infrastructure Network map, nor directly referred to in Policy CS26. While it may be reasonable to deal with the AONB in a separate policy, it is strongly suggested the AONB should at least be referred to in CS26 and/or its supporting text, or alternatively, in the text for CS24, have its strategic GI status identified.			
617246	Ms Janet Nuttall	Natural England				Green Infrastructure	CS26	Policy CS 26	Supporting	Yes	Yes		Policy CS26 Green Infrastructure - we welcome this policy which proposes to protect, extend and enhance the GI Network. We note that designated sites will be protected and opportunities taken to link these into the wider Network. However, it is disappointing that statutory conservation sites including SSSIs and the Chilterns Beechwoods SAC are not given more detailed discussion. These sites form a valuable part of the green infrastructure network of the borough and contribute significantly to local landscape, biodiversity and access. It would be helpful if these were depicted on Map 3 - the Chilterns Beechwoods SAC is included in the key but the site boundary does not appear to be included on the map. Reference should be made to the statutory protection afforded to these sites and the requirement for appropriate assessment and mitigation as part of development.			
6172	Ms	Natural				Green	CS26:	Policy	Objecting	Yes	No		Monitoring of wildlife sites,			

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46	Janet Nuttall	England				Infrastructure	Monitoring	CS 26	g	s			particularly statutory sites, should include consideration of changes in condition of the site as well as to its extent/area.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Green Infrastructure	CS26	Policy CS 26	Supporting	Yes	Yes		<p>We welcome the inclusion of this <i>Policy CS26 Green Infrastructure</i>, and in particular the commitment to protect, extend and enhance the GI network. We would welcome the development of an SPD on the topic, which would bring greater clarity and focus for planners, developers and others with an interest in nature conservation and GI. We also would welcome action plans for habitat management, but would wish this to be expanded to explicitly include habitat restoration and reconnection of habitats.</p> <p>We welcome the Borough's intention to support the national and local BAPs.</p> <p>Whilst we welcome the policy to protect designated sites and, importantly, to take opportunities to link them with the wider GI network, it may be beneficial for the sake of clarity to specify that this covers both statutory and non-statutory designated sites.</p> <p>It would also be better to replace bullet point "strengthening biodiversity corridors" to instead read "the improvement of ecological connectivity and strengthening habitat linkages". This carries across the suggested change in CS10g) to include "wildlife corridors, stepping stones and other ecological linkages". Whilst wildlife corridors are an important element in improving ecological connectivity, it is too narrow a description and risks sidelining or excluding other options, which may be more appropriate in some cases. This</p>	<p>It may be beneficial for the sake of clarity to specify that "designated sites" covers both statutory and non-statutory designated sites.</p> <p>It may be beneficial to explicitly make reference to the Green Infrastructure network working to deliver multiple benefits and secure and enhance various ecosystem services, as discussed very well in the preceding body text.</p> <p>Policy CS26 should refer to the broader aims and range of benefits Dacorum Borough Council hopes to achieve through GI protection, extension and enhancement. We might suggest addition of a 5th bullet point "the protection and enhancement of ecosystem services", or something in this vein.</p> <p>It would also be better to replace bullet point "strengthening biodiversity corridors" to instead read "the improvement of ecological connectivity and strengthening habitat linkages". This carries across the suggested change in CS10g) to include "wildlife corridors, stepping stones and other ecological linkages".</p>	No, I do not wish to participate at the oral examination	

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													<p>alteration would therefore make the Policies more effective and flexible.</p> <p>Whilst the content of the Policy CS26 is good in terms of its biodiversity coverage, it may be beneficial to explicitly make reference to the Green Infrastructure network working to deliver multiple benefits and secure and enhance various ecosystem services, as discussed very well in the preceding body text. This should make the Core Strategy more internally consistent and also align the policy and Strategy better with the Dacorum and Hertfordshire GI Plans (Land Use Consultants/HCC, March 2011; Land Use Consultants/DBC, March 2011) and other related strategies and objectives (eg. Water Framework Directive), national policy and the general direction of work of HMWT and other groups. Increasingly HMWT's work (ie. Living Landscapes) focuses on a landscape-scale, integrated approach to land management and habitat protection and enhancement to deliver multiple benefits, such as flood and water resource management, as well as biodiversity gains. Policy CS26 should refer to the broader aims and range of benefits Dacorum Borough Council hopes to achieve through GI protection, extension and enhancement. We might suggest addition of a 5th bullet point "the protection and enhancement of ecosystem services", or something in this vein.</p>			
211503	Mr Colin	Chilterns Conservation Board				Green Infrastructure	CS26	Policy CS 26	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			

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	White												<p>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 to the purpose of conserving and</p>			

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													<p>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 8th 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>			
211503	Mr Colin White	Chilterns Conservation Board				Conserving the historic environment	Section 17	17	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</p>	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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													meets on 8 th February 2012. Any further comments made at that 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. Chapter 17 is concerned with the historic environment and is supported as drafted.			
405001	Mr Roger Hands	Dacorum Heritage Trust				Conserving the historic environment	Section 17	17	Supporting	Yes	Yes	a) Justified	Dacorum Heritage Trust is supportive of the local authority revising the current Core Strategy and submits the following observations, which we trust will be accepted as our steer for yourselves to consider with regard to Section 17 the Historical Environment. <i>Mission Statement: To collect and record the history of the Borough of Dacorum. To interpret and display the collection in order to encourage interest and appreciation of the heritage of Dacorum.</i> Dacorum Heritage Trust has evolved since 1979 on the initiative of Dacorum District Council and the grant aiding has continued with Dacorum Borough Council to advise both on matters relating to the local heritage and museum activities. The Trust is an umbrella organisation with thirteen local heritage societies and organisations throughout the whole of Dacorum and thus has created a wide ranging voluntary group of local residents of all age and cultural backgrounds		No, I do not wish to participate at the oral examination	

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													<p>working together within the local heritage.</p> <p>DHT has always been convinced of the huge diversity of Dacorum's heritage and since 1979 DHT has been committed to working with the local community to widen the knowledge of all residents and induce a sense of civic pride. We have produced over 40 publications and some films.</p> <p>There are not many districts that possess many stone age and iron age sites; a Roman Villa with a bath second only to Bath; a castle reputed to be where the English submitted to the Norman conquerors; a Norman church; a Grade I medieval timber framed building with medieval wall paintings; the site of the first cottage hospital in the country; the first long distance railway; the first long distance canal linking London to the industrial Midlands; the list is endless. There are also many Royal connections.</p> <p>Dacorum has a very important historical landscape, with its three chalk rivers and a great deal of common land, which includes increasingly rare chalk grassland.</p> <p>Since 1979 DHT has been committed to working for the local community of all ages and backgrounds to widen their interest in local cultural activities and the arts, as well as social and industrial heritage.</p> <p>The DHT Museum Store provides ideal environmental conditions for many local heritage collections to be housed and archived for research and displays highlighting the</p>			

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													<p>activities of the local community.</p> <p>This service is committed to stopping the drain of many examples of the local heritage, as happened in the past, and can claim many important successes.</p> <p>We remain dedicated to the provision of a Dacorum Museum, for this will allow public displays related to many important social and industrial stories that are of proven interest to the local community, as well as attracting tourists to the area.</p> <p>DHT remains committed to protecting the local architectural heritage which has extensive tourism attraction,s such as Ashridge, and collaborates with DBC and their Conservation Areas' appraisals. This currently embraces the wish to regenerate Hemel Hempstead, linking the 'old' and the 'new' towns, since Marlowes itself does have several buildings of note.</p> <p>Roger Hands, Chairman, Dacorum Heritage Trust, 7th December, 2011</p>			
625282	Mr Martin Dowling	Dacorum Architecture Forum				Paragraph	17.5	17.5	Objecting	Yes	No	b) Effective	Paragraph 17.5, sentence 3 refers to "new characterless buildings... should be avoided". "Characterless building" is too vague and meaningless a phrase and also suggests that new buildings should be particularly rich in character which might be entirely inappropriate.	Paragraph 17.5 sentence 3 should refer to "new poorly designed buildings and public realm should be avoided".	No, I do not wish to participate at the oral examination	
607431	Mrs Kate Harwood	Hertfordshire Gardens Trust				Quality of the Historic Environment	CS27	Policy CS 27	Supporting	Yes	Yes		All historic assets, buildings, SAM, landscapes and battlefields should be conserved and a robust policy towards remedial measures for those identified as 'At Risk' should be adopted. The settings of these historic assets should receive equal consideration.		No, I do not wish to participate at the oral examination	

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211072	Ms Katherine Fletcher	English Heritage				Quality of the Historic Environment	CS27	Policy CS 27	Objecting	Yes	No		Paragraph 17.6 refers to the programme of conservation appraisals. We commend this but would emphasise the need to assess and recognise the significance of the new town and its assets, including groups of buildings, spaces and public realm features. These warrant characterisation, understanding with potential designation of conservation areas and local listing. Add to the end of the policy: 'Ongoing appraisal of heritage assets and their settings will inform further local designation and management plans.'			
223914	Mrs Nichola Mills					Quality of the Historic Environment	cs27	Policy CS 27	Supporting	Yes	Yes		Yes - I support the Quality of the Historic Environment policy.		No, I do not wish to participate at the oral examination	
502874	Mr Chris Bearton	Hertfordshire County Council				Quality of the Historic Environment	CS27	Policy CS 27	Objecting	No	No		In line with the guidance set out in PPS5 and the draft NPPF, there is a requirement to set out the strategic priorities for the area in the Local Plan, which includes the protection and enhancement of the historic environment. Furthermore, there is a requirement for non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, to be considered subject to the policies for designated heritage assets. Dacorum has a number of known non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments. In addition, there is also the potential for such heritage assets in many other locations in the Borough. These heritage assets,	All development will favour the conservation of heritage assets. The integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected or conserved in proportion to their significance and if appropriate enhanced. Development will positively conserve and enhance the appearance and character of conservation areas. Negative features and problems identified in conservation area appraisals will be ameliorated or removed. Undesignated heritage assets of archaeological interest that are demonstratively of equivalent significance to scheduled monuments should be identified and protected in all		

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													and others of greater than local interest, are relevant to Local Plan strategic policies and are especially at risk from proposals in NDPs and NDOs as in many cases the local community is unlikely to be aware of their existence and/or the constraints and conservation issues. Although Policy CS27 makes reference to the conservation and protection of both designated and undesignated sites, it is suggested that the following changes are incorporated to the Policy so that it more closely relates to the requirements of PPS5 and the draft NPPF. If the suggested changes are not made, then there is a potential soundness issue with regard to inconsistency with national policy (PPS5) and probably in due course the NPPF. The same may hold true in relation to the suggested wording changes for the individual Place Strategies.	plans and proposals including neighbourhood development plans and orders. The Policy would also benefit from the inclusion of the following footnote. (information and advice on undesignated heritage assets with archaeological interest including those of equivalent significance to scheduled monuments, can be obtained from the Hertfordshire Historic Environment Record)		
625282	Mr Martin Dowling	Dacorum Architecture Forum				Quality of the Historic Environment	CS27	Policy CS 27	Objecting	Yes	No	a) Justified	"The integrity, setting and distinctiveness of designated and undesignated heritage assets will be protected, conserved and if appropriate enhanced." Undesignated heritage assets should not in themselves be given blanket protection. An undesignated heritage asset (e.g. a Victorian terrace house with previously replaced windows) may be neutral in its contribution so it may be appropriate to alter or remove it rather than protect and conserve it. "Development will positively conserve and enhance the appearance and character of conservation areas. Negative features and problems identified in conservation area appraisals will be	The wording should be altered to: "Development will conserve or enhance the appearance and character of conservation areas, and need not necessarily replicate the style or design of existing elements from previous historic periods. Negative features and problems identified in conservation area appraisals will be ameliorated or removed". The wording should be altered to: -The integrity, setting and distinctiveness of designated heritage assets which positively contribute to the Conservation Area will be protected, conserved and if appropriate enhancedll.	No, I do not wish to participate at the oral examination	

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												<p>ameliorated or removed".</p> <p>It is not possible to both conserve and enhance, the first implies no change and the second implies change so it must be one or the other.</p> <p>It is superfluous to refer to 'positive' in relation to conserve or enhance, by implication they both are a positive action. Furthermore the Planning (Listed Buildings and Conservation areas) Act 1990 does not call for a positive action but calls for development to 'not harm' therefore not be negative.</p> <p>This section of the document does not give clarity or guidance to the possibility of different appropriate design approaches, in line with good design principles and summarised well be UNESCO in their Vienna Memorandum, "World Heritage and Contemporary Architecture - managing the Historic Urban Landscape" 2005, with particular regard to article 21.</p>				
211503	Mr Colin White	Chilterns Conservation Board				Using resources efficiently	Section 18	18	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</p>	No, I do not wish to participate at the oral examination		

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													<p>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 meets on 8th February 2012. Any</p>			

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													<p>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>Chapter 18 deals with the issue of using resources efficiently and is generally welcomed and supported.</p>			
627351	Mr Roger Hands	Dacorum Environment Forum Water Group				Using resources efficiently	Section 18	18	Supporting	Yes	Yes	a) Justified	<p>Dacorum Environmental Forum Water Group is supportive of the local authority revising the current Core Strategy and submits the observations which we trust will be accepted as our steer for yourselves to consider with regard to Section 18, the Usage of Resources and Section 28, the Infrastructure.</p> <p><i>Mission Statement: Water is the basis of all life on the planet yet many of us take it for granted. We simply turn on the tap and expect water to appear. Some parts of the world do not always enjoy this privilege.</i></p> <p>Water Scarcity Status. Dacorum uses more water than is available from the local aquifer.</p> <p>Water metering can have a dramatic impact on reducing personal use of water but, Ofwat refuses to make water metering compulsory to all. This campaign has to be maintained.</p> <p>Growth of Hemel Hempstead Strategy has to be expected to some degree but provision of a</p>		No, I do not wish to participate at the oral examination	

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													<p>robust water infrastructure must be an integral part of this strategy.</p> <p>The recent improvements to Berkhamsted Sewage Works treated water discharge into the Grand Union Canal has been a most important step forward in ensuring that water remains within Dacorum rather than simply being exported with raw sewage to Maple Cross. The recent installation of reed beds through which water passes before entering the canal has additional environmental benefits.</p> <p>The recent M1 Widening near Hemel Hempstead incorporated water run-off facilities with reed beds in order to improve water for retaining locally. This treatment of surface water run-off must be more widely adopted throughout the borough with oil and silt traps being used if reed beds are not possible.</p> <p>This group (DEFWG) was present at the meetings related to local Strategic Flood Risk Assessment and the provision of wetlands provided where possible can influence the potential risks associated with occasional flooding. It is pertinent to remind the local authority that this exercise identified the need to investigate the integrity of the Flood Relief Drain installed from Bury Mill to Kings Langley at the time of the New Town Construction fifty years ago.</p> <p>DEFWG attended meetings of Defra and the Environment Agency related to the Water Framework Directive and this group stresses the importance of working to the objectives within this Framework.</p>			

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													<p>This group contributed to the Halcrow Low Flow Study for the river Bulbourne and currently expects to hear the current investigation by the EA into the Sustainable Abstraction for water at the head of the river.</p> <p>DEFWG was invited by the Environment Agency (EA) to sit on the River Gade Sustainability Study which, under Veolia Water, identified in detail all issues related to local water provision whilst sustaining the integrity of the river Gade.</p> <p>The recent Environment Agency „Dacorum Chalk Rivers Restoration Strategies“ for the Bulbourne, Gade and Ver, must receive the vigorous support of everybody within Dacorum</p> <p>The Ver Society collaborates with DEFWG strategically but have been acting to the benefit of the Ver for many years and provide an example all of us seek to emulate.</p> <p>Biodiversity is a most important feature of the local rivers and the DBC Urban Nature Conservation Study is a most important Planning document which this group strongly supports at every opportunity.</p> <p>DEFWG seeks at every opportunity to stress the importance of chalk streams/ivers. They are an internationally rare landscape feature and the majority exist in the UK. Dacorum is most fortunate in having three flowing within its district. To have two chalk streams joining within just half a mile of Hemel Hempstead Town Centre is unique.</p>			

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													<p>The Hemel 2020 initiative at Two Waters and Two Waters Lake are both most important recent initiatives which must receive the utmost support .</p> <p>The Buncefield Disaster has clearly impacted the local aquifer and remains a serious concern for all.</p> <p>DEFWG is currently contributing to the Veolia Water Drought Management Plan and was recently advised that the local aquifer is currently being seriously affected by low rainfall. The local rivers are currently suffering an ecological drought. The annual winter recharge is crucial this year and more facts will be known by next March.</p> <p>Roger Hands, Chairman, Dacorum Environmental Forum Water Group, 7th December, 2011</p>			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.12	18.12	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	18.13	18.13	Objecting	Yes	No	a) Justified	As the opportunities for wind power referred to in the final sentence are mostly in the Green Belt or in Chilterns AONB, the text after "Green Belt" should be amended to be consistent with national policy.	The text after "Green Belt and" should be amended to read "or AONB. Very special circumstances would need to be demonstrated to outweigh inappropriateness and the harm caused, by any proposals in these areas".	No, I do not wish to participate at the oral examination	
617246	Ms Janet Nuttall	Natural England				Paragraph	18.13	18.13	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			

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617246	Ms Janet Nuttall	Natural England				Paragraph	18.14	18.14	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.15	18.15	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.16	18.16	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.17	18.17	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.18	18.18	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
211503	Mr Colin White	Chilterns Conservation Board					Map 4	Map 4	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:	Add the AONB to Map 4.	No, I do not wish to participate at the oral examination	

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												<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 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</p>				

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													<p>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 8th 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>Map 4 details the energy opportunities for the Borough. Though the map is already fairly busy it would be useful to add the AONB to it in order to show that this is also a constraint alongside the Green Belt.</p>			
398370	Mr Matt Richardson	Gleeson Strategic Land	621389	Mr Bob Sellwood	Sellwood Planning		Table 11	Table 11	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified, effective and is not consistent with national policy.</p> <p>Whilst the proposed submission text of Policy CS28 is unexceptional in seeking carbon reductions, the supporting text at paragraph 18.12 and 18.15 and Table 11 indicate a policy approach which would result in the accelerated introduction of a higher code for sustainable homes levels than proposed by the Government. If this is the intent of the policy, it is objected to and needs to be justified by the Council at the public examination. The basis of the objection is that the Government is seeking to avoid overburdening the house building</p>	<p>No amendments to Policy CS28 is necessary, but Table 11 should be deleted since there is no justification for acceleration commencement dates for Code 5 compliance levels from 2013. There also needs to be a consequential amendment to Policy CS29 (f) to remove the cross reference to Table 11.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Gleeson is promoting the local allocation site at Marchmont Farm (LA1) and the company and its consultants are experienced in methods of carbon reduction and the progressive introduction of higher levels of the Code for Sustainable Homes.</p>

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.
													sector with higher code levels which will be costly to implement. What are the particular circumstances in Dacorum which justify the application of higher standards that are set nationally by the Government?			
467616	Mr Richard Ronald						Table 11	Table 11	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>Table 11 is not clear and conflicts with other requirements.</p> <p>The main mechanism of raising fabric insulation levels is the National Building Regulations. Table 11 and Policy CS29 represent a backward step - it took years to get rid of Local Building Byelaws - but this would become a sort of Local Building Byelaw, by differing from National Building Regulations.</p> <p>Table 11 will create dates for implementation different from building regulations thereby creating further conflicts. Building Regulations work to precise timetables depending upon when the application is submitted and the planning application dates will invariably differ creating confusion. The Policy is too detailed going into the exact number of litres of water usage for example. This matter is anyway covered by Part G of the Building Regulations so why include it here? If the Building Regulations changes the number of litres per day then the two figures will conflict.</p> <p>The concept of District Heating Opportunity Area is unsound when examined.</p> <p>There are no existing district heating systems to speak of. Any new</p>	Table 11 to be deleted.	Yes, I wish to participate at the oral examination	

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													system that applied to new housing would not be commercially viable when you consider the rapidly rising insulation levels in the building fabric of new homes which is being driven by Building Regulations Part L. Indeed by 2016 according to Government timetables new housing would be at or close to zero carbon in which case the heating load would be minimal or non-existent for any new property. What would the point be of District Heating?			
625390	Mr Jon Tankard	Dacorum Architecture Forum					Table 11	Table 11	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy. Whilst the policy alleviates the small housing projects from the extra 5% carbon emissions target we can't help feel that for projects over 5 houses this will be placing an unnecessary burden on development of larger sites which are already facing the new 'site charges' and the increase in construction costs due to the Codes having to be met without any real saleable tag to the purchaser i.e. 'Code 4 but a bit better'. Whilst we fully appreciate the requirements for the increase we do feel that introducing this at this time could have financial implications on the economic growth. Under policy CS29 it states that 'the principles in this policy (CS29) may be relaxed if the scheme would be unviable or there is not a technically feasible approach' if the scheme was proved to be 'unviable' due to the increased financial burden that the developer was having to shoulder could this policy be relaxed?	Set the Code Standards as set within Table 11 but omit the 5% additional.	No, I do not wish to participate at the oral examination	
617246	Ms	Natural England				Paragraph	18.19	18.19	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and			

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	Janet Nuttall												Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.19	18.19	Supporting	Yes	Yes		We welcome the focus on sustainable design and construction in the Core Strategy as a way to address various challenges and the specific reference in paragraph 18.19 to habitat loss. This might be expanded to read "habitat loss and fragmentation", which is correctly recognised elsewhere in the text as a major issue (paragraph 16.20). More broadly, we approve of the focus on sustainability in built environment within the Core Strategy, as this is necessary to achieve real gains for biodiversity and ecological connectivity and functioning, which cannot be achieved through focus on designated sites and isolated patches. There is a need to take a whole landscape approach.	Paragraph 18.19 reference to habitat loss. This might be expanded to read "habitat loss and fragmentation".	No, I do not wish to participate at the oral examination	
633312	Mrs Patricia Bramley					Paragraph	18.19	18.19	Objecting	Yes	No		Housing should be seriously considered as with living areas upstairs and warm air rising less fuel is required to heat the area most used and gives a chance to turn off downstairs radiators as not always required. My house has this system.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.20	18.20	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.21	18.21	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of			

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													development.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.22	18.22	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.22	18.22	Supporting	Yes	Yes		We welcome the inclusion of paragraph 18.22, but suggest that the phrase "ecological benefits" would be more clearly and accurately described as "ecosystem service benefits", given the following text. As mentioned previously, the final sentence of paragraph 18.22 should be adjusted to read "help to plant more trees, of appropriate species, in appropriate locations and contexts, to expand the tree canopy in the borough". It would be better in the Core Strategy to consistently discuss appropriate woodland creation and tree planting as a means to deliver multiple benefits for nature and communities.	Paragraph 18.22, we suggest that the phrase "ecological benefits" would be more clearly and accurately described as "ecosystem service benefits", given the following text. The final sentence of paragraph 18.22 should be adjusted to read "help to plant more trees, of appropriate species, in appropriate locations and contexts, to expand the tree canopy in the borough". It would be better in the Core Strategy to consistently discuss appropriate woodland creation and tree planting as a means to deliver multiple benefits for nature and communities.	No, I do not wish to participate at the oral examination	
467616	Mr Richard Ronald					Paragraph	18.23	18.23	Objecting	Yes	No	a) Justified	It does not take into account costs to developers of small projects less than 5 dwellings. It could frustrate the objects of the Council ie to regenerate run down areas of the Towns in Dacorum, and provide badly needed housing.	Developers of sites of 5 dwellings or more will be expected to complete a Sustainability Statement and carbon compliance check online for their proposal. Payments by developers of sites of 5 dwellings or more will be expected to complete a Sustainability Statement and carbon compliance check online for their proposal.....	Yes, I wish to participate at the oral examination	To speak up for the householders and small developers who are not always able to attend such events.
617246	Ms Janet Nuttall	Natural England				Paragraph	18.23	18.23	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			

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618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.23	18.23	Objecting	No	No	b) Effective	<p>Paragraph 18.23. Whilst we support the Borough's commitment to sustainability throughout the Core Strategy, there is some inconsistency in the document as to exactly what this means. Whereas some sections nicely illustrate the concept of sustainable development and sustainability in its broad sense (eg. Figures 9 and 10, the breadth of the Strategic Objectives), other sections belie a focus on fairly narrow definition or understanding of it - specifically reduction of carbon emission and climate change mitigation. This apparent emphasis comes across in paragraphs 18.23, 18.24 and 18.25, as well as Policy CS30: Sustainability Offset Fund. These paragraphs and the Policy CS30 should be redrafted, to balance out the dominant focus on carbon emission reductions and better encompass all those other aspects of sustainable development discussed elsewhere in the document (including paragraph 18.19). The Sustainability Statement compiled by developers should also cover issues such as protection and enhancement of habitats and ecosystems, water resource management and climate change adaptation, as well as climate change mitigation. The Sustainability Offset Fund should be used to support initiatives relating to climate change mitigation, but not exclusively and not where other aspects of sustainability will be compromised as a result. To illustrate, woodland creation on biodiversity-rich grasslands or heathlands would not be appropriate in broad sustainability terms. Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that</p>	<p>Consistency needed over what sustainability means and over Sustainability Offset Fund in Paragraphs 18.23, 18.24 and 18.25, as well as Policy CS30: Sustainability Offset Fund. These paragraphs and the Policy CS30 should be redrafted, to balance out the dominant focus on carbon emission reductions and better encompass all those other aspects of sustainable development discussed elsewhere in the document (including paragraph 18.19).</p> <p>Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.</p>	No, I do not wish to participate at the oral examination	

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													deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.24	18.24	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.24	18.24	Objecting	No	No	b) Effective	Paragraph 18.23. Whilst we support the Borough's commitment to sustainability throughout the Core Strategy, there is some inconsistency in the document as to exactly what this means. Whereas some sections nicely illustrate the concept of sustainable development and sustainability in its broad sense (eg. Figures 9 and 10, the breadth of the Strategic Objectives), other sections belie a focus on fairly narrow definition or understanding of it - specifically reduction of carbon emission and climate change mitigation. This apparent emphasis comes across in paragraphs 18.23, 18.24 and 18.25, as well as Policy CS30: Sustainability Offset Fund. These paragraphs and the Policy CS30 should be redrafted, to balance out the dominant focus on carbon emission reductions and better encompass all those other aspects of sustainable development discussed elsewhere in the document (including paragraph 18.19). The Sustainability Statement compiled by developers should also cover issues such as protection and enhancement of habitats and	Consistency needed over what sustainability means and over Sustainability Offset Fund in Paragraphs 18.23, 18.24 and 18.25, as well as Policy CS30: Sustainability Offset Fund. These paragraphs and the Policy CS30 should be redrafted, to balance out the dominant focus on carbon emission reductions and better encompass all those other aspects of sustainable development discussed elsewhere in the document (including paragraph 18.19). Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.	No, I do not wish to participate at the oral examination	

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													ecosystems, water resource management and climate change adaptation, as well as climate change mitigation. The Sustainability Offset Fund should be used to support initiatives relating to climate change mitigation, but not exclusively and not where other aspects of sustainability will be compromised as a result. To illustrate, woodland creation on biodiversity-rich grasslands or heathlands would not be appropriate in broad sustainability terms. Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.25	18.25	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and Construction, including requirements for retention of trees/replacement of trees as part of development.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.25	18.25	Objecting	No	No	b) Effective	Paragraph 18.23. Whilst we support the Borough's commitment to sustainability throughout the Core Strategy, there is some inconsistency in the document as to exactly what this means. Whereas some sections nicely illustrate the concept of sustainable development and sustainability in its broad sense (eg. Figures 9 and 10, the breadth of the Strategic Objectives), other sections belie a focus on fairly narrow definition or understanding of it - specifically reduction of	Consistency needed over what sustainability means and over Sustainability Offset Fund in Paragraphs 18.23, 18.24 and 18.25, as well as Policy CS30: Sustainability Offset Fund. These paragraphs and the Policy CS30 should be redrafted, to balance out the dominant focus on carbon emission reductions and better encompass all those other aspects of sustainable development discussed elsewhere in the document (including	No, I do not wish to participate at the oral examination	

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													carbon emission and climate change mitigation. This apparent emphasis comes across in paragraphs 18.23, 18.24 and 18.25, as well as Policy CS30: Sustainability Offset Fund. These paragraphs and the Policy CS30 should be redrafted, to balance out the dominant focus on carbon emission reductions and better encompass all those other aspects of sustainable development discussed elsewhere in the document (including paragraph 18.19). The Sustainability Statement compiled by developers should also cover issues such as protection and enhancement of habitats and ecosystems, water resource management and climate change adaptation, as well as climate change mitigation. The Sustainability Offset Fund should be used to support initiatives relating to climate change mitigation, but not exclusively and not where other aspects of sustainability will be compromised as a result. To illustrate, woodland creation on biodiversity-rich grasslands or heathlands would not be appropriate in broad sustainability terms. Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.	paragraph 18.19). Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.		
617246	Ms Janet	Natural England				Paragraph	18.26	18.26	Supporting	Yes	Yes		We support the proposals outlined for Renewable Energy and Sustainable Design and			

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	Nuttall												Construction, including requirements for retention of trees/replacement of trees as part of development.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.26	18.26	Objecting	Yes	No	b) Effective		Paragraph 18.26 should read "Sustainability Offset Fund".	No, I do not wish to participate at the oral examination	
610882		Stanhope Plc and Aviva	610880	Mr Philip Allard	Planning Perspectives	Carbon Emission Reductions	Policy CS 28	Policy CS 28	Objecting	Yes	No	b) Effective	<p>The aspiration to reduce carbon emissions from new development is welcomed. However, the targets identified in Table 11 are considered to be economically unsustainable given the achievable rents in the Maylands Business Park. The targets need to be reviewed so that they are flexible and do not place financial burdens on development which would make them unviable and therefore, constrain development. Policies CS28 and CS29 should be aspirational and should not contain inflexible targets which cannot be achieved. It is important that the financial burdens do not make Hemel Hempstead uncompetitive with other office locations.</p> <p>The Carbon Offset Fund and the District Heating Opportunity Areas identified in paragraph 18.17 will place additional financial burdens on development which will potentially make them unviable and uncompetitive with other office locations.</p>	Policies CS28 and CS29 should be aspirational subject to viability considerations.	Yes, I wish to participate at the oral examination	These policies will have a direct impact on the Peoplebuilding site, an important and major site in the Borough.
617246	Ms Janet Nuttall	Natural England				Carbon Emission Reductions	CS28	Policy CS 28	Supporting	Yes	Yes		We welcome the recognition that developers should consider carbon-reduction measures and investment in low and zero community heat infrastructure before simply committing contributions to the Sustainability Offset Fund.			
6187	Mr	Brixton	6187	Miss Barton		Carbon Emission	CS28	Policy	Objecting	Yes	No	a)	It is not Justified, Effective or	We suggest that the wording in	No, I do not	

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82	John Thompson	Properties Limited	83	Alyson Jones	Willmore	Reductions		CS 28	g	s		Justified	<p>Consistent with national policy.</p> <p>There should be a specific reference to the viability of these measures on development to ensure that development is not prevented through the enforcement of the policy measures. Alternatively there should be a specific policy requirement for viability to be taken into account in the further guidance yet to be published.</p> <p>Areas of the Maylands Business Park, including units A-G appear to fall within a District Heating Opportunity Area, according to Core Strategy Map 4, Energy Opportunities Plan however it is not clear as to what the requirements for such sites will be given the further guidance yet to be produced, therefore it is considered that the policy is neither justified, effective or consistent with national policy, without some greater clarity in the policy wording as to what the guidance should cover.</p>	Policy CS29, Sustainable Design and Construction, is included in Policy CS28. Policy CS29 states that the principles of the policy may be relaxed if the scheme would be unviable or there is not a technically feasible approach.	wish to participate at the oral examination	
398370	Mr Matt Richardson	Gleeson Strategic Land	621389	Mr Bob Sellwood	Sellwood Planning	Carbon Emission Reductions	CS28	Policy CS 28	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified, not effective and not consistent with national policy.</p> <p>Whilst the proposed submission text of Policy CS28 is unexceptional in seeking carbon reductions, the supporting text at paragraphs 18.12 and 18.15 and Table 11 indicate a policy approach which would result in the accelerated introduction of a higher code for sustainable homes levels than proposed by the Government. If this is the intent of the policy, it is objected to and needs to be justified by the Council at the public examination. The basis of the objection is that the Government is seeking to avoid overburdening the housebuilding</p>	No amendment to Policy CS28 is necessary, but Table 11 should be deleted since there is no justification for accelerated commencement dates for Code 5 compliance levels from 2013. There also needs to be a consequential amendment to Policy CS29 (f) to remove the cross reference to Table 11.	Yes, I wish to participate at the oral examination	Gleeson is promoting the local allocation site at Marchmont Farm (LA1) and the company and its consultants are experienced in methods of carbon reduction and the progressive introduction of higher levels of the Code for Sustainable Homes.

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													sector with higher code levels which will be costly to implement. What are the particular circumstances in Dacorum which justify the application of higher standards than are set nationally by the Government?			
503254		Royal Mail	625562	Ms Lisa Bowden	BNP Paribas Real Estate	Carbon Emission Reductions	CS28	Policy CS 28	Objecting	Yes	No		<p>Royal Mail recognises the need to reduce carbon emissions and for new developments to minimise energy consumption and production of CO2. However, we consider that the wording of Policies CS28 to be highly prescriptive and onerous, without providing suitable flexibility. As such, Royal Mail is concerned that this will affect the deliverability of development.</p> <p>We are of the opinion that there is no point in the Council setting targets if they will effectively make development unviable and will as a result prevent development from coming forward. We consider that the Council needs to maintain a balance between aspiring to achieve high standards of sustainability and energy savings, with the realistic feasibility of delivery and cost required to do so. We therefore request that such measures detailed in Policies CS28 will be subject to assessment of technical feasibility and viability.</p>	We note that the Council identifies in Policy CS28 that "where new development cannot meet these requirements the applicant will be expected to make an appropriate contribution to the Carbon Offset Fund ..." We request that the Policy explicitly identify that any form, and the level, of contribution is justified in planning policy, scheme impacts and government guidance Circular 05/05 terms and is also deliverable in terms of viability, in order to provide flexibility so that development in the Borough is not stifled.		
620322		West Herts College	620319	Ms Alison Tero	CBRE	Carbon Emission Reductions	CS28	Policy CS 28	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified, effective and not consistent with national policy.</p> <p>It is important that the Core Strategy policies are sufficient flexible to be responsive to changing circumstances over the life of the Core Strategy. As such reference in Policy CS29 to Table 11 and specifically Buildings Regulations are not considered appropriate and</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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													<p>WHC further considers that Chapter 18 of the Core Strategy should clarify the timescales for when the new standards identified in Table 11 will be applicable to new development proposals.</p> <p>Recognition within the policy wording that some of the requirements in Policy CS29 may be unviable or not technically feasible is supported. However, it is not considered appropriate to then seek a financial contribution towards a Sustainability Offset Fund. We understand it is the Council's intention to bring forward CIL, if this is the case then additional contributions towards a Sustainability Offset Fund should not be sought or required by Policy 29 and WHC therefore objects to Policy CS28, CS29 and CS30.</p>			<p>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 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.</p>
625390	Mr Jon Tankard	Dacorum Architecture Forum				Carbon Emission Reductions	CS28	Policy CS 28	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>Whilst the policy alleviates the small housing projects from the extra 5% carbon emissions target we can't help feel that for projects over 5 houses this will be placing an unnecessary burden on development of larger sites which are already facing the new 'site charges' and the increase in construction costs due to the Codes having to be met without any real saleable tag to the purchaser i.e. 'Code 4 but a bit better'.</p> <p>Whilst we fully appreciate the requirements for the increase we do feel that introducing this at this time could have financial implications on the economic growth. Under policy</p>	Set the Code Standards as set within Table 11 but omit the 5% additional.	No, I do not wish to participate at the oral examination	

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													CS29 it states that 'the principles in this policy (CS29) may be relaxed if the scheme would be unviable or there is not a technically feasible approach' if the scheme was proved to be 'unviable' due to the increased financial burden that the developer was having to shoulder could this policy be relaxed?			
4676 16	Mr Richard Ronald					Sustainable Design and Construction	Policy CS29	Policy CS 29	Objecting	Yes	No	b) Effective	<p>The costs of meeting Code for Sustainable Homes are excessive especially for Codes 4 5 and 6.</p> <p>Costs are very tight now and are likely to be for some time.</p> <p>A lot of Housing Associations no longer have to meet this requirement because they are not receiving HCA grant funding (because the Government is also short of funds)</p> <p>There is anyway a mechanism for raising fabric insulation standards which is Part L of the Building Regulations.</p> <p>I suggest the chart is omitted.</p> <p>There is also a mechanism for reducing water usage standard per person which is Part G of the Building Regulations.</p> <p>The addition of more and more extra costs by Dacorum Core Strategy risks some basic aims of the Council which is to secure regeneration and the supply of much needed homes.</p>	Omit Table 11 from the Core strategy.	Yes, I wish to participate at the oral examination	To defend the case made if necessary
3560 14	Mrs Anna Parr	Environment Agency				Sustainable Design and Construction	CS29	Policy CS 29	Supporting	Yes	Yes		We support the commitment to limit residential indoor water consumption to 105 litres per person per day. This will help achieve the objectives of the Water Framework Directive.		No, I do not wish to participate at the oral examination	

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488516	mr Hugh siegle					Sustainable Design and Construction	CS 29	Policy CS 29	Objecting		No	b) Effective	Policy states principles may be relaxed if scheme would be unviable or not technically feasible. This gives developers the opportunity to drive a coach and horses through the policy and it will be ineffective	Principles should only be relaxed in exceptional circumstances and viability is not one	No, I do not wish to participate at the oral examination	
502874	Mr Chris Bearton	Hertfordshire County Council				Sustainable Design and Construction	CS29	Policy CS 29	Supporting	Yes	Yes		In respect of the Waste Planning Authority encouraging the promotion of the sustainable management of waste, the Core Strategy reflects this in the sustainable design and construction section in terms of designing and constructing buildings that help to minimise key resources and construction waste from decommissioning buildings and considering refurbishment before demolition. This is backed up by Policy CS29 stating the need to recycle and reduce construction waste which may otherwise go to landfill and provide on-site recycling facilities for waste. There is also consideration of how materials could be recycled at the end of the building's life which is a positive addition to the document. As stated in our previous representations, the principles of relaxing policy CS29 are not supported given that it loses the main thrust of the positive nature of the policy.			
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd	Sustainable Design and Construction	Policy CS29	Policy CS 29	Objecting	Yes	No	b) Effective	Whilst we support the aspirations of Policy CS29 in terms of promoting sustainable design and construction, the Policy implies a requirement for new development to meet all stated principles/criteria listed in the policy. In the current economic climate it is unlikely that new development could reasonably (and viably) achieve all the principles listed within the policy text. Furthermore, it is possible that some of the requirements/principles	The opening paragraph to Policy CS29 should be redrafted as follows: "Applicants will be expected to demonstrate how new development will achieve the highest standard of sustainable design and construction possible (having regard to the criteria listed below), whilst ensuring that new development continues to be viable/deliverable:"	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-

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													may not be effective/appropriate/suitable/achievable on certain developments (and in certain locations). Rather, Policy CS29 should be flexibly applied with applicants/developers encouraged to achieve the highest standards of sustainable design/construction in-line with the criteria listed within the policy, but having regard to the need to ensure that new development remains viable/deliverable.			Submission Core Strategy).
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Sustainable Design and Construction	CS29	Policy CS 29	Supporting	Yes	Yes		The inclusion of Policy CS29 within the Core Strategy is supported. In particular the inclusion of the following principles under Policy CS29 is strongly supported: b) Minimise water consumption during construction. d) Provide adequate means of water supply, surface water and foul drainage. e) Limit residential indoor water consumption to 105 litres per person per day, until national statutory guidance supercedes this advice. i) Minimise impermeable surfaces around the cartilage of buildings and in new street design. j) Incorporate permeable ... surfaces within urban areas.	N/A	No, I do not wish to participate at the oral examination	
211053	unknown	Wm Morrison Supermarkets plc	628141	Mr Anthony Ferguson	Peacock & Smith	Sustainable Design and Construction	CS29	Policy CS 29	Objecting	Yes	No	c) Consistent with national policy	The wording of policy CS29 is challenged.	I suggest that the first sentence of emerging Policy CS29: Sustainable Design and Construction is amended to read "New development will comply with the highest standards of sustainable design and construction where possible."	No, I do not wish to participate at the oral examination	
4676	Mr					Sustainable	CS29	Policy	Objecting	Yes	No	a)	It is not sound because it is not	"New development wil normally	Yes, I wish	

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16	Richard Ronald					Design and Construction		CS 29	g	s		Justified	<p>Justified, Effective or Consistent with national policy.</p> <p>This 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.</p> <p>The requirements for Sustainable energy in Table 11 impose potentially huge costs on developers, particularly after 2013 when Code for Sustainable Homes goes up to Levels 4 to £27k for CSH level 5.</p> <p>The Council policy is likely to put a stop to much small scale projects with this policy. Particularly when combined with policy CS35 there would likely be vast potential costs on small developers.</p> <p>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.</p>	<p>comply with the current applicable version of Code for Sustainable Homes. This Code has 9 categories that the builders need to address and the current version is CSH Level 3 carrying 57 points".</p> <p>Delete (a) to (k)</p> <p>"Buildings will be designed to have a long life and adptable internal layout. The recycling of materials at the end of the building's life should be considered as part of the CSH.</p> <p>Larger developments of more than 10 dwellings in the towns or less than 3 dwellings in the rural area to be exempt from provision of contributions to the Sustainability Offset Fund.</p> <p>Reference to District Heating to be removed.</p>	to participate at the oral examination	
471307	George Edkins	Hightown Praetorian & Churches HA				Sustainable Design and Construction	CS 29	Policy CS 29	Objecting	Yes	No	a) Justified	<p>The policy seeks to reduce carbon across the borough. The majority of the carbon output of the borough's houses comes from older stock built to lower standards, or indeed before there were any thermal performance standards (ie pre 1973). New build is not the problem, particularly in the future when the current already high Building Regulation and other standards are further increased.</p> <p>A requirement to meet Code 5 brings great marginal cost with little environmental return, and will seriously detract from the resources available to developers to cross subsidise the requirement to provide</p>	In CS 29 delete the paragraph from "Applicant will therefore need to explain" to "connection to decentralised community heating systems"	Yes, I wish to participate at the oral examination	In order to explore the issue from a specialist viewpoint

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													<p>35% affordable housing.</p> <p>The direction of all new design is towards greater insulation and airtightness, thus scaling back and in some cases (PassivHaus) eliminating altogether the need for heating systems, so it would be retrograde to require that new development provide centralised heating systems for the surrounding district. Equally even there were active proposals for a district heating system for existing stock, there is not much point in new development plugging into such systems when the new build heating load will be so low.</p> <p>The policy also refers to the recycling of materials at the end of the building's life. Our aim, unlike say a car manufacturer, is to have near permanent homes, with an indefinite life.</p>			
499516	Sainsbury's	Sainsbury's	398364	Mr Sean McGrath	Indigo Planning	Sustainable Design and Construction	CS29	Policy CS 29	Objecting	Yes	No		<p>Draft Policy CS29 requires that carbon emission reductions will be expected to be delivered through improvements to the fabric of the building. It goes on to state that where developments cannot make these requirements, the applicant will be expected to make an appropriate contribution to the Carbon Offset Fund.</p> <p>Whilst Sainsbury's agree that sustainable development should be at the core of future planning policy, the Council must remain flexible and balanced in their approach to achieving economic prosperity as well as protecting the environment. This is particularly relevant where</p>			

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													certain schemes are sometimes marginal and, if policy is over prescriptive, this can threaten deliverability. It is therefore, important that a balance is struck between sustainability and economic prosperity, and that this is reflected in policy.			
503254		Royal Mail	625562	Ms Lisa Bowden	BNP Paribas Real Estate	Sustainable Design and Construction	CS29	Policy CS 29	Objecting	Yes	No		We support the flexibility provided in the last paragraph of this Policy which identifies that "the principles in this Policy may be relaxed if the scheme would be unviable or there is not a technically feasible approach". Notwithstanding this support, we request that the Policy explicitly identify that any form, and the level, of contribution is justified in planning policy, scheme impacts and government guidance Circular 05/05 terms and is also deliverable in terms of viability, in order to provide flexibility so that development in the Borough is not stifled.			
620322		West Herts College	620319	Ms Alison Tero	CBRE	Sustainable Design and Construction	CS29	Policy CS 29	Objecting	Yes	No		<p>The Core Strategy is unsound because it is not justified, effective and not consistent with national policy.</p> <p>It is important that the Core Strategy policies are sufficient flexible to be responsive to changing circumstances over the life of the Core Strategy. As such reference in Policy CS29 to Table 11 and specifically Buildings Regulations are not considered appropriate and WHC further considers that Chapter 18 of the Core Strategy should clarify the timescales for when the new standards identified in Table 11 will be applicable to new development proposals.</p> <p>Recognition within the policy</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 recommendations made in its representations to</p>

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													wording that some of the requirements in Policy CS29 may be unviable or not technically feasible is supported. However, it is not considered appropriate to then seek a financial contribution towards a Sustainability Offset Fund. We understand it is the Council's intention to bring forward CIL, if this is the case then additional contributions towards a Sustainability Offset Fund should not be sought or required by Policy 29 and WHC therefore objects to Policy CS28, CS29 and CS30.			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.
625390	Mr Jon Tankard	Dacorum Architecture Forum				Sustainable Design and Construction	CS29	Policy CS 29	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>Items a, e, f, g, I and k will already be picked up within the Code for Sustainable Homes Level 3 so really have no function within this policy.</p> <p>Items b and c can only be managed during the site works. Although a sustainability site works assessment can be made prior to the works proceeding who will oversee that the works are proceeding as such?</p> <p>The wording the principles in this policy may be relaxed if the scheme would be unviable or there is not a technically feasible approach.</p> <p>This appears to limit the effectiveness of the whole low carbon strategy especially if the 'unviability' of the scheme comes with regard to 'design' and 'historic context' policies set out within the Core Strategy. Surely it would be better to 'relax' the afore mentioned policies in order to maintain the</p>	<p>Maintain statements b, c, h and j.</p> <p>Where a method statement for the Sustainable Site Works has been submitted as part of the planning application this should be referred to within the planning approval to ensure that the contractor refers to and follows the statement.</p> <p>Where a scheme would be unviable due to the restrictions of policies CS10, 11, 12, 13 and 27 then the latter mentioned policies should be relaxed in order to allow policies 28 and 29 to take precedent.</p> <p>All trees planted as part of the Tree Canopy Requirements be of native stock with clear benefits to the local biodiversity.</p>	No, I do not wish to participate at the oral examination	

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													<p>CO2 reductions to which this Core Strategy is based. If the scheme is 'unviable' due to policies, which the planning body do not feel could be relaxed, would the applicant be liable for the Sustainability Offset Fund?</p> <p>The decentralised heating system is still in its infancy for commercial housing sites and its requirement may limit potential developers of sites. Would future proofing via connection to a future decentralised heating system potentially be a waste of time? On a commercial housing estate who would instruct the work in the future?</p> <p>The tree canopy requirements make no direct mention of species which is essential in order to gain maximum benefit for bio diversity.</p>			
610882		Stanhope Plc and Aviva	610880	Mr Philip Allard	Planning Perspectives	Sustainable Design and Construction	Policy CS 29	Policy CS 29	Objecting	Yes	No	b) Effective	<p>The aspiration to reduce carbon emissions from new development is welcomed. However, the targets identified in Table 11 are considered to be economically unsustainable given the achievable rents in the Maylands Business Park. The targets need to be reviewed so that they are flexible and do not place financial burdens on development which would make them unviable and therefore, constrain development. Policies CS28 and CS29 should be aspirational and should not contain inflexible targets which cannot be achieved. It is important that the financial burdens do not make Hemel Hempstead uncompetitive with other office locations.</p> <p>The Carbon Offset Fund and the District Heating Opportunity Areas identified in paragraph 18.17 will place additional financial burdens on development which will</p>	Policies CS28 and CS29 should be aspirational subject to viability considerations.	Yes, I wish to participate at the oral examination	These policies will have a direct impact on the Peoplebuilding site, an important and major site in the Borough.

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													potentially make them unviable and uncompetitive with other office locations.			
502874	Mr Chris Bearton	Hertfordshire County Council				Sustainability Offset Fund	CS30	Policy CS 30	Objecting	No	No		Reference is made in Policy CS30 to the deliverability of the Sustainability Offset Fund to be achieved by adherence to the <i>Hertfordshire Municipal Waste Spatial Strategy</i> '. The correct reference should be made to the Joint Municipal Waste Management Strategy(2007) which underpins the strategy from which the MWSS feeds into.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Sustainability Offset Fund	CS30	Policy CS 30	Objecting	No	No	b) Effective	Paragraph 18.23. Whilst we support the Borough's commitment to sustainability throughout the Core Strategy, there is some inconsistency in the document as to exactly what this means. Whereas some sections nicely illustrate the concept of sustainable development and sustainability in its broad sense (eg. Figures 9 and 10, the breadth of the Strategic Objectives), other sections belie a focus on fairly narrow definition or understanding of it - specifically reduction of carbon emission and climate change mitigation. This apparent emphasis comes across in paragraphs 18.23, 18.24 and 18.25, as well as Policy CS30: Sustainability Offset Fund. These paragraphs and the Policy CS30 should be redrafted, to balance out the dominant focus on carbon emission reductions and better encompass all those other aspects of sustainable development discussed elsewhere in the document (including paragraph 18.19). Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.	No, I do not wish to participate at the oral examination		

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													<p>change mitigation. The Sustainability Offset Fund should be used to support initiatives relating to climate change mitigation, but not exclusively and not where other aspects of sustainability will be compromised as a result. To illustrate, woodland creation on biodiversity-rich grasslands or heathlands would not be appropriate in broad sustainability terms. Paragraph 18.23 must be clearer, by saying that the Sustainability Offset Fund "will be used to support initiatives that deliver sustainability improvements, such as reducing carbon emissions, managing surface water runoff, and enhancing biodiversity and ecological connectivity", or something similar. It would be beneficial to state that initiatives delivering multiple benefits to the environment and communities will be favoured.</p> <p>We welcome Policy CS30: Sustainability Offset Fund, and hope that this will be used to support initiatives delivering multiple benefits for communities and the environment. Habitat restoration and management, high-quality 'urban greening' schemes and retrofitting of urban GI are known to generate various public goods and secure ecosystem services. We strongly welcome the fact that the Policy mentions further guidance on the Fund, which is clearly needed. Nonetheless, greater clarity and consistency within the Policy and in the related Core Strategy text as a whole would be beneficial.</p>			
620322		West Herts College	620319	Ms Alison Tero	CBRE	Sustainability Offset Fund	CS29	Policy CS 30	Objecting	Yes	No		The Core Strategy is unsound because it is not justified, effective and not consistent with national policy.		Yes, I wish to participate at the oral examination	West Herts College (WHC) would like to participate at the oral part of the

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													<p>It is important that the Core Strategy policies are sufficient flexible to be responsive to changing circumstances over the life of the Core Strategy. As such reference in Policy CS29 to Table 11 and specifically Buildings Regulations are not considered appropriate and WHC further considers that Chapter 18 of the Core Strategy should clarify the timescales for when the new standards identified in Table 11 will be applicable to new development proposals.</p> <p>Recognition within the policy wording that some of the requirements in Policy CS29 may be unviable or not technically feasible is supported. However, it is not considered appropriate to then seek a financial contribution towards a Sustainability Offset Fund. We understand it is the Council's intention to bring forward CIL, if this is the case then additional contributions towards a Sustainability Offset Fund should not be sought or required by Policy 29 and WHC therefore objects to Policy CS28, CS29 and CS30.</p>		n	<p>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 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.</p>
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	18.27	18.27	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</p>	Add 'conserve' after 'protect' in line 1 of bullet point 6.	No, I do not wish to participate at the oral examination	

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												<p>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 board. The attached response has</p>				

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													<p>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 8th 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>Paragraph 18.27 deals with sustainable resource management and requires that development is carried out in a sustainable way. Reference is made to natural features of importance including landscapes. The Board considers that this element should be conserved and enhanced and that a small change to the sixth bullet point would achieve this.</p>			
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	18.27	18.27	Supporting	Yes	Yes		It is encouraging that reference is made to the need to safeguard all mineral reserves within the sustainable resource management section.			
617246	Ms Janet Nuttall	Natural England				Paragraph	18.27	18.27	Supporting	Yes	Yes		<p>We welcome the more detailed discussion of the issue of climate change and the need to address this through sustainable resource management.</p> <p>We are pleased that sustainable resource management principles will seek to ensure the protection and enhancement of natural features of importance, including wildlife and landscape.</p>			

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488516	mr hugh siegle					Paragraph	18.29 (and 18.30)	18.29	Objecting		No	b) Effective		Water efficiency measures will be insufficient to address the likely water shortage resulting from new development. Out of area water supplies are essential before the scale of new development proposed can be allowed to proceed	No, I do not wish to participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.29	18.29	Supporting	Yes	Yes	a) Justified	The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported. We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether: 1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and; 2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.		No, I do not wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	18.30	18.30	Supporting	Yes	Yes		BRAG also notes that that development of ridge top locations results in land sealed against rain water with resulting affects on the level of rainfall left to recharge groundwater sources.		No, I do not wish to participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.30	18.30	Supporting	Yes	Yes	a) Justified	The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported. We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether:		No, I do not wish to participate at the oral examination	

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													1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and; 2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.30	18.30	Supporting	Yes	Yes		We welcome the reference to and clear acknowledgment of links and overlap of water resources and ecosystem integrity, in paragraph 18.30. We welcome paragraph 18.31 relating to Sustainable Urban Drainage Systems, and would hope that there will be steps to maximise the benefits for local nature conservation as well as effective surface water regulation from SUDS and other measures		No, I do not wish to participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.31	18.31	Supporting	Yes	Yes	a) Justified	The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported. We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether: 1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and; 2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.		No, I do not wish to participate at the oral examination	
618873	Miss	Herts and Middlesex				Paragraph	18.31	18.31	Supporting	Yes	Yes		We welcome the reference to and clear acknowledgment of links and		No, I do not wish to	

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	Odette Carter	Wildlife Trust											overlap of water resources and ecosystem integrity, in paragraph 18.30. We welcome paragraph 18.31 relating to Sustainable Urban Drainage Systems, and would hope that there will be steps to maximise the benefits for local nature conservation as well as effective surface water regulation from SUDS and other measures		participate at the oral examination	
356014	Mrs Anna Parr	Environment Agency				Paragraph	18.32	18.32	Supporting	Yes	Yes		We support the reference to your Strategic Flood Risk Assessment.			
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.32	18.32	Supporting	Yes	Yes	a) Justified	<p>The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported.</p> <p>We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether:</p> <p>1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and;</p> <p>2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.</p>		No, I do not wish to participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.33	18.33	Supporting	Yes	Yes	a) Justified	<p>The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported.</p> <p>We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to</p>		No, I do not wish to participate at the oral examination	

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													<p>establish whether:</p> <p>1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and;</p> <p>2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.</p>			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	18.34	18.34	Objecting	Yes	No	b) Effective	<p>The Water Cycle Study Scoping Report ⁽³⁵⁾, referred to is not effective because it does not identify how the current problems will be addressed before development increases deficiencies. For Berkhamsted it states that "the Waste Water Treatment is currently operating close to its discharge consent and there are water quality concerns to the discharge being to the GUC."</p>	Expand to explain how deficiencies are going to be addressed prior to any development.	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.
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.34	18.34	Supporting	Yes	Yes	a) Justified	<p>The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported.</p> <p>We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether:</p> <p>1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and;</p> <p>2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.</p>		No, I do not wish to participate at the oral examination	

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618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.35	18.35	Objecting	No	No	a) Justified	<p>The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported.</p> <p>We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether:</p> <p>1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and;</p> <p>2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.</p> <p>It is our understanding however that further work on the Water Cycle Strategy will be aimed at establishing how extensive upgrades need to be to the sewerage networks throughout Dacorum and the Study area, rather than only Hemel Hempstead and Kings Langley.</p>	<p>Amend bullet point 2) in paragraph 18.35 to read:</p> <p>1) "How extensive the upgrades need to be to the sewerage networks throughout Dacorum and the Water Cycle Study area."</p>	No, I do not wish to participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.35	18.35	Supporting	Yes	Yes	a) Justified	<p>The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported.</p> <p>We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether:</p> <p>1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical</p>		No, I do not wish to participate at the oral examination	

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													standards, and; 2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.			
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.36	18.36	Supporting	Yes	Yes	a) Justified	The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported. We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether: 1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and; 2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.		No, I do not wish to participate at the oral examination	
356014	Mrs Anna Parr	Environment Agency				Paragraph	18.37	18.37	Supporting	Yes	Yes		We support the commitment to achieve the following objectives: restore river flows; restore natural habitats along the chalk streams and in Boarscroft Vale; support biodiversity; retain water in the catchment area; recharge the aquifer; limit the effect of variable rainfall and reduce the risk of flooding; provide sufficient capacity for foul water drainage; increase the efficiency of water use, in part through sustainable design and			

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													construction			
488516	mr Hugh siegle					Paragraph	18.37	18.37	Objecting	No	b) Effective		These proposed actions are meaningless and completely unspecific. Where is the water to come from? There are existing problems to be addressed let alone the compounding effect of new development		No, I do not wish to participate at the oral examination	
617246	Ms Janet Nuttall	Natural England				Paragraph	18.37	18.37	Supporting	Yes	Yes		As part of the Water Cycle Study we are pleased to note that the Council will work with partners to support biodiversity including restoration of habitats along with chalk streams and in Boarscroft Vale. CS31 Water Management requires measures to be secured to protect and enhance biodiversity.			
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Paragraph	18.37	18.37	Supporting	Yes	Yes	a) Justified	The inclusion of the section on Water Management (paragraphs 18.29 - 18.37) within the Core Strategy is strongly supported. We also support the inclusion of the reference at paragraphs 18.34 and 18.35 to the need for further work in respect of a Water Cycle Study to establish whether: 1) Maple Lodge and Blackbirds Waste Water Treatment Works would need to increase the Dry Weather Flow consent and introduce new physio-chemical standards, and; 2) How extensive the upgrades need to be to the sewerage networks throughout Hemel Hempstead and Kings Langley.		No, I do not wish to participate at the oral examination	
618873	Miss Odette	Herts and Middlesex Wildlife Trust				Paragraph	18.37	18.37	Supporting	Yes	Yes		We strongly welcome the commitment in paragraphs 18.37 and 18.39 to restore chalk river habitats. HMWT would be happy to		No, I do not wish to participate at the oral	

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	Carter												work with DBC towards this objective. There is some opportunity to link up targets and objectives within the Core Strategy to other schemes relating to delivering the Water Framework Directive as well as local and national BAP targets. HMWT is embarking on a 'Living Rivers' Project for Hertfordshire, which aims to develop an action plan for Hertfordshire's rivers and restore some of the county's internationally ecologically significant chalk river system. This could open up opportunities for partnership on implementation within Dacorum.		examination	
610088	Mr Martin Hicks	HBRC				Paragraph	18.38	18.38	Objecting	No	b)	Effective	This currently provides no reference to the identification of the ILE's light zones within the Borough or other guidance, which have previously been identified. DBC was previously in the forefront nationally in raising this issue (in conjunction with work on lighting and ecology at HBRC) and applying it through the planning process as recognised in many reports and national guidance on the issue. I would not wish to see this momentum reduced through diminished policy guidance. If it is not reflected in detail within the core strategy it should be subject to SPD, and reference to this should therefore be made within the core strategy. Light zones and detailed guidance is most helpful to reflect parts of the Borough where a dark landscape is to be encouraged and guide external lighting considerations elsewhere. These will also have important biodiversity benefits, as specifically referred to in para.175 of the NPPF.	Add Light Zones and lighting guidance to the Core strategy. If not, make reference to more detailed guidance in the form of an SPD.	No, I do not wish to participate at the oral examination	
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.38	18.38	Supporting	Yes	Yes		We strongly welcome the commitment in paragraphs 18.37 and 18.39 to restore chalk river habitats. HMWT would be happy to work with DBC towards this		No, I do not wish to participate at the oral examination	

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													objective. There is some opportunity to link up targets and objectives within the Core Strategy to other schemes relating to delivering the Water Framework Directive as well as local and national BAP targets. HMWT is embarking on a 'Living Rivers' Project for Hertfordshire, which aims to develop an action plan for Hertfordshire's rivers and restore some of the county's internationally ecologically significant chalk river system. This could open up opportunities for partnership on implementation within Dacorum.		n	
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	18.39	18.39	Supporting	Yes	Yes		The text at paragraph 18.39 relating to the potential need to relocate and enlarge the existing Household Waste Recycling Centre as part of a new Waste Park is welcomed. Hertfordshire Property/Planning Obligations and officers from the Waste Management Unit would welcome further discussions in connection with the provision of such a facility. It would also be important to ensure that the mechanisms for delivery of any replacement facility are incorporated into the IDP/CIL tariff/Section 106 contributions		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

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																same. It is considered that attendance at the EiP by HCC officers should assist DBC officers in proving the 'soundness' of the Core Strategy.
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	18.39	18.39	Objecting	No	No		<p>Pursuing the need to manage waste close to its source is covered in paragraph 18.39 which refers to all waste streams and states that unnecessary waste should be reduced and managed nearer to its source. In addition it should also be considered that recycled materials could be utilised within new development schemes.</p> <p>Site Waste Management Plans are a useful tool to engage with developers to minimise waste produced on site and re-use and recycle where possible. Reference should be made to the need for planning applications to be supported by a SWMP for projects costing more than £300,000 as a delivery mechanism to ensure that waste is minimised and where produced is managed in the most appropriate way which can also be cost effective for the developer for all types of developments. This would be in line with Policy 11 of the emerging Waste Core Strategy and Development Management Policies.</p>			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	18.39	18.39	Supporting	Yes	Yes		We strongly welcome the commitment in paragraphs 18.37 and 18.39 to restore chalk river habitats. HMWT would be happy to work with DBC towards this objective. There is some opportunity to link up targets and objectives within the Core Strategy to other schemes relating to delivering the Water Framework Directive as well		No, I do not wish to participate at the oral examination	

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													as local and national BAP targets. HMWT is embarking on a 'Living Rivers' Project for Hertfordshire, which aims to develop an action plan for Hertfordshire's rivers and restore some of the county's internationally ecologically significant chalk river system. This could open up opportunities for partnership on implementation within Dacorum.			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	18.40	18.40	Supporting	Yes	Yes		<p>The text at paragraph 18.39 relating to the potential need to relocate and enlarge the existing Household Waste Recycling Centre as part of a new Waste Park is welcomed. Hertfordshire Property/Planning Obligations and officers from the Waste Management Unit would welcome further discussions in connection with the provision of such a facility.</p> <p>It would also be important to ensure that the mechanisms for delivery of any replacement facility are incorporated into the IDP/CIL tariff/Section 106 contributions</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

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																assist DBC officers in proving the 'soundness' of the Core Strategy.
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	18.40	18.40	Objecting	No	No		Para 18.40 refers to Waste Management Authority which should read ' Waste Planning Authority ' to ensure that the responsibility of the County Council is stated clearly. Para 18.40 makes reference to the Waste Core Strategy and it should be acknowledged that the council merged two documents within the waste development framework and therefore the document should be referred to in full as the ' Waste Core Strategy and Development Management Policies DPD '. The DPDs not only establish broad locations for strategic waste facilities but also allocated sites and employment land areas of search for future waste uses;			
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Water Management	CS31	Policy CS 31	Objecting	No	b) Effective		These aspirations are welcome but ineffective since they cannot be guaranteed given the main growth targets of the plan. See our response to Policy CS 32 .	See our response to Policy CS 32 .	No, I do not wish to participate at the oral examination	
356014	Mrs Anna Parr	Environment Agency				Water Management	CS 31	Policy CS 31	Supporting	Yes	Yes		We strongly support this policy which will ensure that development is located appropriately and environmental enhancements are delivered.			
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd	Water Management	Policy CS31	Policy CS 31	Objecting	Yes	No	c) Consistent with national policy	Criterion (a) should be re-drafted to better explain/reflect the requirements of PPS25 - in terms of the application of the sequential approach/exceptions test.	Criterion (a) to be redrafted as follows: "(a) Development will be discouraged in Flood Zones 2 and 3 other than for water compatible uses. Where other forms of development are proposed in Flood Zones 2 and 3, such development will only be supported when accompanied by a Flood Risk Assessment and where it can	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

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														be shown that the development will meet the requirements of the sequential test/exceptions test (as set out in PPS25) and incorporate any necessary mitigation measures."		in the Pre-Submission Core Strategy).
617246	Ms Janet Nuttall	Natural England				Water Management	CS31	Policy CS 31	Supporting	Yes	Yes		As part of the Water Cycle Study we are pleased to note that the Council will work with partners to support biodiversity including restoration of habitats along with chalk streams and in Boarscroft Vale. CS31 Water Management requires measures to be secured to protect and enhance biodiversity.			
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Water Management	CS31	Policy CS 31	Supporting	Yes	Yes		The inclusion of Policy CS31 Water Management within the Core Strategy is supported.	N/A		
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Water Management	CS31	Policy CS 31	Supporting	Yes	Yes		We strongly support the Policy CS31: Water Management, in particular its focus on restoring natural flows and requirement d) "to secure opportunities to conserve and enhance biodiversity". We would recommend that point c) be modified to read, "c) secure opportunities to reduce the cause and impact of flooding through sustainable approaches, such as using green infrastructure for flood storage", to increase the clarity and effectiveness of the policy.	Policy CS31: Water Management. We would recommend that point c) be modified to read, "c) secure opportunities to reduce the cause and impact of flooding through sustainable approaches, such as using green infrastructure for flood storage", to increase the clarity and effectiveness of the policy.	No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Water Management	CS31	Policy CS 31	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		No, I do not wish to participate at the oral examination	

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												<p>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 board. The attached response has</p>				

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													<p>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 8th 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>Policy CS31 is welcomed and supported as drafted.</p>			
607346	DEF Dacorum Environmental Forum	Dacorum Environmental Forum Waste Group				Air, Soil and Water Quality	CS32	Policy CS 32	Objecting	No	b) Effective	<p>These aspirations are welcome but ineffective since they cannot be guaranteed given the main growth targets of the plan. See also our response to 1.4.</p> <p>The Sustainability Appraisal Report (Table 4-3: Compatibility of SA/SEA and Core Strategy Objectives) states clearly that as a result of the proposed levels of housing and economic growth a number of adverse and uncertain effects have 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 be a more significant issue over time. Housing development will result in an</p>	Change to a lower growth target, as per our response to 1.4.	No, I do not wish to participate at the oral examination		

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													increase in greenhouse gas emissions from energy used in new housing and associated activities.			
610088	Mr Martin Hicks	HBRC				Air, Soil and Water Quality	Policy CS 32	Policy CS 32	Objecting	No	b) Effective		Lack of detail re light pollution, in contrast to previous Policies and guidance. See comments on 18.38	Amend Policy to reflect more detailed guidance or its availability.	No, I do not wish to participate at the oral examination	
356014	Mrs Anna Parr	Environment Agency				Air, Soil and Water Quality	CS 32	Policy CS 32	Supporting	Yes	Yes		We support the reference to the treatment of contaminated land and to the Water Framework Directive.			
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Air, Soil and Water Quality	CS32	Policy CS 32	Supporting	Yes	Yes		The inclusion of Policy CS32 Air, Soil and Water Quality within the Core Strategy is supported.	N/A	No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Air, Soil and Water Quality	CS32	Policy CS 32	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</p>		No, I do not wish to participate at the oral examination	

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													<p>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 8th 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</p>			

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													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. Policy CS32 is welcomed and supported as drafted.			
633333	Mr Paul Harris	Dacorum Green Party				Air, Soil and Water Quality	CS32	Policy CS 32	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 affects have however been identified. There will be increases in levels of land take which could have localised adverse effects on environmental factors such as resident's soils, landscape and townscape. There are also likely to be increases in the level of water abstraction which in an area already identified is over abstracted could become a more significant issue over time. Housing development will result in an increase in greenhouse 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 raises the question where is the water coming from? Building on Green Belt land decreases biodiversity and 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	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Place Strategies - Introduction	Section 19 Place Strategies	19	Supporting	Yes	Yes		P 159 [Place strategies] Para 19.2 Support The second bullet: "Secure more affordable housing and a balanced mix of housing types. " Should be accompanied, possibly elsewhere, with indicative numbers of affordable dwelling in each settlement. It is not sufficient to state the overall numbers envisaged at major settlements: the outcomes will differ and be very dependent on the nature and scale of local house building.	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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													<p>The fourth bullet:</p> <p>Maintain and enhance the character, built heritage, natural environment and leisure assets of each settlement and the wider countryside.</p> <p>Local Character Area Assessments have served to safeguard the character, densities and vernacular of local areas: these should be retained.</p>			
366491	Mr Brian Worrell					Paragraph	19.2 Common Local Objectives	19.2	Objecting	Yes	No	b) Effective	<p>I support all the Common Local Objectives and suggest that either bullet point 8 in enlarged, or a new bullet point is added to include improving access for horse riders and horse carriage drivers to places of leisure, in these cases, off road facilities and services. There are a large number of these residents and many of the urban based riders and drivers regularly have to face busy and fast roads to access the countryside. Many rights of way are only accessible by these roads and many rights of way do not link to each other or provide safe circular routes for leisure.</p>	I suggest adding after 'cyclists', the following words: horse riders and horse carriage drivers,		
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	19.2 - Common Local Objectives	19.2	Supporting	Yes	Yes		<p>There is full support for the overarching identification within the Core Strategy of the need to ensure that; 'new housing is balanced by school capacity and matched by additional community facilities and local infrastructure'.</p> <p>From the perspective of services provision, it is essential that this linkage is reflected through the Infrastructure Delivery Plan (IDP) and in any Section 106 agreements associated with significant infrastructure provision on large development sites. Providing that is the case then, whoever is responsible for service provision,</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

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													the opportunity for the needs of the new community being met will have been provided.			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				Paragraph	19.2	19.2	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 the public of the special qualities of the area of outstanding natural beauty But if it appears to the board that there is a conflict between those	Delete 'maintain' at the start of the fifth objective and replace with 'conserve'.	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 8th 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 common local objectives applicable to the place strategies are detailed on page 159. The Board generally welcomes these but considers that the start of the fifth objective should be amended to read 'conserve and enhance' 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.			
619677		Blackjack Investments Ltd	398614	Mr Mark Flood	Insight Town Planning	Paragraph	19.7	19.7	Objecting	Yes	No	a) Justified	CS unsound because it is not justified and it is not consistent with national policy. The specific identification of the local allocations should be deleted, along with a consequential change to paragraph 19.7 of the CS. Table 9 can still refer to the anticipated supply from the site allocations DPD as a component of the housing trajectory.		Yes, I wish to participate at the oral examination	
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 19.9	19.9	Supporting	Yes	Yes		P160 Local Community Plans Para 19.9 - 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.
333991	Mrs Christa	STANDARD LIFE INVESTMENTS LTD	333985	MRS CHRISTA	STANDARD LIFE INVESTMENTS LTD	Hemel Hempstead Place Strategy	Chapter 20 Hemel Place Strategy	20	Supporting	Yes	Yes		The Marlowes is now identified as the prime retail pitch which is to be welcomed and supported.			

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	Masters	C/O MONTAGU EVANS LLP		MASTERS	C/O MONTAGU EVANS LLP											
211043	Ms Anne Box					Hemel Hempstead Place Strategy	20. Hemel Hempstead Place Strategy	20	Objecting	No	No		<p>I understand there are still no specifics. In the fifteen years I have lived at 40 Ebbens Road I have watched the town centre die. The market, the Pavillion, the hospital. Consultations and developers come-and go. The centre is culturally non-existent. It needs a good size concert hall to house opera, theatre, ballet symphony concerts and musical shows together with a gallery, gift shops etc. and a large screen for live transmissions there being no such for miles. This would bring people into the town thus revitalizing it economically and making it safer at night.</p> <p>I have also waited in vain for you to give the permission sought by the owners to reclassify Nos. 1=13 Frogmore Road for residential development in accordance with your declared philosophy and that of the original new town. Only three of the original tenants are still there thers could not afford to stay proving that they are NOT in fact economically viable, and in any case, there are now alternatives in appropriate places for heavy traffic and all night industrial activities such as we still have to endure. The government's attitude is now abundantly clear so</p> <p>what exactly is causing the delay? Leases run</p> <p>out in 2013, future plans to do with my life style rest on the outcome and the owners need to make their plans so please could this decision be expedited.</p>		No, I do not wish to participate at the oral examination	

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211055	Mr Matthew Wood	Hertfordshire County Council				Hemel Hempstead Place Strategy	Section 20 Local Objectives	20	Supporting	Yes	Yes		<p>The Place Strategy makes explicit reference to ;</p> <p>Provision of a primary school Provision of a new library and civic/cultural facilities Provision of a primary school for East Hemel (with the possibility of further education related development depending upon the scale of any development that St Albans District Council may promote in their administrative area to the east of Hemel. Provision of 'better waste management facilities' - the need for an enlarged replacement Household Waste Recycling Centre, (HWRC) has been made in previous reps. The provision of 'Several Primary Schools'.</p> <p>HCC welcome the positive identification of the need for the above facilities, and notes the identification of the potential suitability of the hospital site to provide additional school capacity, and the provision of a replacement library as part of a civic and cultural hub in the town centre. Since previous representations in November last year, it is worth noting that the only capacity that was considered to exist in existing schools in the Hemel East PPA at Tudor Primary has been developed to meet existing need, (1fe expansion granted planning permission summer 2011). In the Hemel Hempstead South East PPA, planning permission was granted this year for a 1fe expansion at</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>Hammond Primary.</p> <p>Therefore, to meet the needs arising out of the indigenous Dacorum housing being planned for in the document (ie excluding any development to the east of Leverstock Green), capacity is confined to that represented by reopening of Jupiter Drive and Barncroft and Chambersbury, giving a total of 2.5fe. This is clearly inadequate provision to provide for the potential needs arising out of the additional 8800 houses planned in Hemel Hempstead to 2031.</p> <p>With regard to the reference to 'several primary schools' the last bullet point in 3.31 above, text within the CS document identifies that it would be prudent to plan for the potential requirement for new 2fe primary schools at;</p> <p>Town Centre [1800 units town centre]</p> <p>West Hemel [900 units Local Allocation 3] NB the potential child yield arising out of this development would be between 1 and 2 forms of entry. It is therefore prudent spatial planning to ensure that a site is available with capacity to meet yields at the upper end of the scale. It is our understanding that a primary school would be provided as part of LA3 (see separate landowner reps relating to Local Allocation 3 and HCC's Chaulden Lane site).</p> <p>East Hemel [1000 units] (excluding any housing growth associated with residential development in</p>			

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													<p>St Albans City and District). East Hemel (to accommodate child yield arising out of any significant residential development in St Albans City and District and which would need to be bottomed out through further tri partite discussions). The Core Strategy identifies two further reserve allocations, in locations to be determined through the Site Allocations document, as being prudent. [Third bullet at section 27.14, (the Flexibility and Contingency) section of the plan, providing a further 4 fe of potential education capacity]. Demand for additional school places arising out of the existing areas of North East Hemel, including Local Allocation 1 at Marchmont Farm, would need to be met via the provision of new capacity, which might involve the re opening of Barncroft and its potential expansion to 2fe depending upon the availability of appropriate detached playing fields. To complete the context for education in the Hemel north east PPA, it should also be noted that Brockswood School may have potential for expansion in the event that suitable land were made available to provide additional playing fields. HCC has previously made representations relating to the need to identify an appropriate site to meet the</p>			

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													<p>potential need for a 2fe school well related to the Hemel Hempstead South east PPA.* That need still exists and it would be helpful to delivery if an appropriate education allocation can be made at the Site Allocations DPD stage. Officers from Children's Services and Hertfordshire Property will be happy to discuss this particular point further with DBC colleagues.</p> <p>There is an interrelationship between the Hemel Hempstead South East PPA, Kings Langley, and school places in Three Rivers to the south east.</p> <p>Subject to the potential need for a new school allocation to prudently plan for</p> <p>additional school places in South East Hemel being followed through in any Site Allocations Document, with funding of the same being linked through the IDP, then HCC supports policies CS33, Hemel Hempstead Town Centre, and CS34, Maylands Business Park as set out in the CS.</p>			
211068	Mr Nick Harper	The Crown Estate	210968	Ms Helena Deaville	AMEC	Hemel Hempstead Place Strategy	Section 20	20	Objecting	Yes	No	a) Justified	The Core Strategy is considered to be unsound in that it is not justified in terms of consideration of realistic alternatives. Land to the east of Hemel Hempstead was included as an option in the November 2006 Issues and Options 'Growth at Hemel Hempstead' consultation document. The Sustainability Appraisal did not identify any major constraints to development and the issues that scored negatively are	In order for the Core Strategy to be sound, it is considered that growth to the east of Hemel Hempstead should be fully assessed individually as an option (rather than as part of the eastern and dispersed options which included other sites), and the northern (north east Hemel Hempstead) option should be considered separately from the south eastern option.	Yes, I wish to participate at the oral examination	Given the significant extent of The Crown Estate's landholdings to the east of Hemel Hempstead, and its concerns as to the reasons why its land was not taken forward into the Submission

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													<p>not considered to have been appraised correctly taking into account the proximity of the site to employment areas and the new facilities/public transport links that would be provided as part of the development.</p> <p>The June 2009 Emerging Core Strategy (page 146) stated that "Further extension of Hemel Hempstead's residential areas may be necessary or appropriate. The best opportunity with least impact, lies to the east of Spencer's Park and south of the Nickey Line." It goes on to note that St. Albans would be the planning authority and would be responsible for decisions on the level of development. However, no specific options for Hemel Hempstead were assessed as part of the SA. The reason given for this was due to the uncertainty at the regional level, and as options had already been considered in the 'Growth at Hemel Hempstead', November 2006 Issues and Options Paper.</p> <p>In March to August 2009, Dacorum developed three options for delivering housing growth around Hemel Hempstead and these were assessed as part of the evidence base for the Dacorum and St. Albans Core Strategies. The three options were as follows:</p> <p>Eastern option which includes land to the east of the town in St. Albans, West Hemel Hempstead and Marchmont Farm.</p> <p>Northern option which includes land to the north of the town (requiring a northern bypass), West Hemel Hempstead and</p>	<p>Consideration of sites individually would pick up on issues that are specific to the site. This approach would accord with PPS12.</p> <p>The reasons for discounting land to the east and only referring to the possibility of new homes in St. Albans in the Submission Core Strategy should be fully addressed. Development to the east of the town was considered by Dacorum to be a sustainable option. If this is the most sustainable option for growth of the town then the tightly drawn local authority boundary should not be a reason for it not to be progressed.</p> <p>Whilst the broad approach is considered to be sound, The Crown Estate considers that there should have been full consideration of options for growth to the east of the town and clear discussions with St. Albans about this sustainable option, as set out in our representations relating to cross boundary issues and the distribution of development/alternatives.</p>		<p>Core Strategy, it is considered necessary to participate at the examination. The interest in the land between the Buncefield Oil Depot and the M1 and the significant employment and regeneration opportunities associated with potential development of this site is also an important issue that needs to be considered at the examination.</p> <p>The Crown Estate is a significant landowner in the Dacorum/St. Albans area and owns the part of the Spencer's Park site that is located within St. Albans. The Crown Estate therefore has a significant interest in the proposals for East Hemel Hempstead.</p>

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													<p>north of Gadebridge. Dispersed option, which includes land to the east of the town in St. Albans, West Hemel Hempstead and Shendish.</p> <p>Dacorum developed a methodology for assessing these options and an SA assessed broader overarching issues. This assessment concluded that the northern option had the most potential for significant adverse effects on the environment and that the other two options were likely to have fewer effects. The November 2010 SA of the Dacorum Core Strategy Consultation Draft states in section 6.3.4 in relation to the August 2009 Housing Growth Options that: "The eastern strategy in combination with the East Hemel Hempstead Area Action Plan (AAP), should they both proceed, could have cumulative positive effects on the economic and social objectives through the provision of employment, leisure and housing in close proximity, plus improvements to transport infrastructure."</p> <p>The three options that were developed in August 2009 were to be taken forward for consultation by Dacorum, but just prior to publication they were not progressed due to the timing of the policies relating to Hemel Hempstead in RSS14 being quashed, and there was effectively a policy gap in relation to housing numbers, Green Belt review and the identification of an urban extension to the east of Hemel Hempstead (into St. Albans).</p> <p>The Core Strategy consultation in</p>			

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													<p>November 2010 did not include land to the east of Hemel Hempstead (north or south of the A414), and the land was not included a part of the Assessment of Local Allocations and Strategic Sites Document (October 2010). This does not appear to be related to the results of the previous sustainability appraisal, but simply the fact that land to the east of the town falls within a different authority. Please also refer to The Crown Estate's representations relating to cross boundary issues (on Form 1).</p> <p>There are no major environmental constraints to development to the east of the town, the land makes a limited contribution to the Green Belt, the M1 is a clear robust long term Green Belt boundary to prevent encroachment into the countryside and development would not impact negatively on the AONB, unlike developments in a number of other locations. Development of a mixed use neighbourhood in this location would assist in balancing the mix of uses to the east of the town, providing housing and community facilities close to the Maylands Employment Area. Critically, it would also assist in the regeneration of this area. These key points do not seem to have been considered as part of the sustainability appraisal work to date.</p> <p>There has been significant interest in the employment land between Buncefield and the M1 from logistics companies including a high profile major logistics company with significant interests in road, rail and air freight operations. The Crown Estate as landowner has been approached due to the suitability of the site for logistics, including the size of the site and the excellent</p>			

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													<p>motorway links in a location that is central to air freight centres which are important to such operations.</p> <p>Development of this nature would provide a significant number of jobs (estimated to be between 200 and 500) for residents of Dacorum and St. Albans, and these would be across a range of skill levels. A similar operation in the Midlands has over 600 employees on site in addition to other jobs maintained in local couriers, sub-regional service centres and a network of collection points. This development would also assist in the regeneration of the Maylands area, widening the range of jobs and companies in the area. The land makes a very limited contribution to the Green Belt in terms of openness and it is surrounded by major infrastructure to the east and west, the Buncefield Oil Depot and the M1.</p> <p>Opportunities for such employment development should be considered as part of the Core Strategy and the approach agreed with St. Albans prior to progressing further detail of an employment allocation through the East Hemel Hempstead AAP. Allocation of this land would accord with the approach set out in the Draft NPPF which at paragraph 73 requires that local planning authorities should set out strategies which positively and proactively encourage sustainable economic growth. It would also accord with the Strategic Employment objectives set out on page 83 of the Pre-Submission Core Strategy. Policy CS15 should therefore be amended to provide for a greater supply of land for storage and distribution uses. The 2010 SW Hertfordshire Employment Land Update identified that further consideration should be</p>			

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													<p>given to the release of the land east of Buncefield for B2/B8 development, although this is not reiterated in the 2011 update.</p> <p>In addition to the Dacorum assessment, the St. Albans Planning Policy Advisory Meeting Agenda on 16 September 2010 recognised that although in the Green Belt, North East Hemel Hempstead is in a sustainable location and the initial findings of the St. Albans Proactive Green Belt study showed that the site scored well in terms of suitability for release from the Green Belt. Dacorum and St. Albans officers have therefore recognised the suitability of land to the east of Hemel Hempstead, but due to lack of full cross boundary co-operation, this option has not been taken further. A sustainable and suitable location for the expansion of Hemel Hempstead should not be dismissed simply because it falls within a neighbouring authority, particularly given that the Localism Bill which sets out the 'duty to co-operate' has recently obtained Royal Assent.</p> <p>It is our view that this alternative should not have been dismissed, particularly given that there was no justified reason for doing so in relation to the findings of the sustainability appraisal. The reason for the option not being progressed does not appear to be clearly set out in any of the consultation documents.</p> <p>PPS12 states at paragraph 4.38 that the ability to demonstrate that the plan is the most appropriate when considered against reasonable alternatives delivers confidence in the strategy. It goes</p>			

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													<p>on to advise that being able to demonstrate that the plan is the most appropriate having gone through an objective process of assessing alternatives will result in an easier passage through the examination process. Therefore all alternatives should have been fully considered and assessed.</p> <p>The Crown Estate supports the Core Strategy's approach to regenerate the Maylands Business Park. In particular reference to the new residential neighbourhood at Spencer's Park is welcomed. However, it is our view that in order to be able to provide sufficient new facilities and services, and to balance the employment/residential mix in East Hemel Hempstead, provision should be made for a significant extension to Spencer's Park to the east. Whilst the policies specific to Hemel Hempstead in the East of England Plan have been quashed, the Plan was clear that there was a need to regenerate the Maylands/Buncefield area.</p> <p>Providing more housing in the form of a significant new community in this area is likely to be very beneficial for the Maylands Area and wider East Hemel Hempstead. The current problems such as lack of services and facilities in the area need to be addressed not only through new facilities in the heart of Maylands but also through balancing the mix of uses in the wider area, through the development of residential and other social and community facilities to the east of Maylands at North</p>			

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													<p>East Hemel Hempstead, as part of a larger sustainable neighbourhood.</p> <p>As set out in our representations relating to the distribution of development and alternatives, there has been significant interest in the employment land between Buncefield and the M1 from major logistics companies who have approached The Crown Estate as landowner. An employment allocation on this land would provide significant benefits, not only in terms of job creation for Dacorum and St. Albans (estimated to be between 200 and 500 new jobs), but in terms of the wider benefits for the regeneration of the Maylands area. This opportunity should be fully considered by Dacorum and St. Albans as part of the development of the East Hemel Hempstead AAP. Please refer to The Crown Estate's representations relating to the distribution of development/alternatives for further detail on this.</p> <p>Further evidence from Hertfordshire County Council (HCC) should be provided or made available with regard to the reference on page 174 of the Core Strategy that there is a need for a new primary school to serve the Spencer's Park area. Also on page 174, there is reference in relation to Spencer's Park that greenfield land also offers opportunities for decentralised heating systems or CHP. If feasible, this is likely to involve Maylands and potentially new residential areas. This is a further reason why an urban extension to the east of</p>			

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													<p>Spencer's Park into St. Albans should be progressed as there is an opportunity to create a highly sustainable development, possibly linking in to the Maylands energy centre and making use of district heating opportunities. The scale of development needs to be large enough to make this both technically feasible and financially viable.</p> <p>With regard to the delivery of a new north-eastern relief route in the Maylands area (Policy CS9), the need for this proposal should be fully considered as part of the East Hemel AAP and fully justified through a clear evidence base, as there may be more appropriate traffic solutions depending on the scale and location of development in this area.</p>			
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Hemel Hempstead Place Strategy	Hemel Hempstead Place Strategy	20	Supporting	Yes	Yes		<p>The Hemel Hempstead Place Strategy is supported in principle, however it should be noted that individual development proposals and sites will need to be assessed in respect of their impact on the waste water network. Depending on the precise location and scale of development proposed, local network upgrades could be required.</p> <p>In addition the cumulative impact of the level of development proposed will have a significant impact on the overall flows of sewage to Maple Lodge Sewage Treatment Works (located near Rickmansworth in Three Rivers District). Further work in respect of the Water Cycle Strategy (see Core Strategy Paragraphs 18.34 - 18.35) will help to determine whether any upgrades to Maple Lodge STW are</p>		No, I do not wish to participate at the oral examination	

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													necessary.			
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Hemel Hempstead Place Strategy	Section 20, Local Objectives In East Hemel Hempstead - to deliver	20	Supporting	Yes	Yes		This comment relates to the Local Objectives for Hemel Hempstead (Page 165-166). Our client supports the objectives identified for the town as a whole and, particularly, the identified housing target of 8,800 homes over the plan period. The breakdown of housing distribution/allocation for the town centre, East Hemel Hempstead and the rest of the town is considered to provide useful clarification of the anticipated housing capacity for each area.		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.
620322		West Herts College	620319	Ms Alison Tero	CBRE	Hemel Hempstead Place Strategy	Section 20	20	Objecting	Yes	No		WHC consider in order for the Hemel Hempstead Place Strategy to be considered 'Sound' and to justify the Core Strategy approach when considered against reasonable alternatives (as required by PPS12), that the context to the place strategy should refer to the Council's evidence base studies, in particular the findings of the Retail Study Update prepared by GL Hearn (GLH) in October 2011.		Yes, I wish to participate at the oral examination	
626821	Mr Neville Spiers	Paper Trail Trust	626819	Mr Chris Watts	Maze Planning Ltd	Hemel Hempstead Place Strategy	Section 20	20	Objecting	No	No	a) Justified	It is unsound because it is not Justified, Effective, Consistent with national policy. It is considered that the Hemel Hempstead Place Strategy has clearly been developed with the		No, I do not wish to participate at the oral examination	

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													<p>town centre and Marylands as the focus for future master planning. This may make sense strategically, and as a focus for the use of the Council's own resources, but it seems to have left Apsley as a place and part of the town, completely excluded.</p> <p>Apsley was the centre of the paper making industry in the UK and has a rich industrial heritage. It has a different character and mix than the rest of the town, and the conservation and enhancement of that heritage, as promoted by the Trust, should have been given more weight and referencing in this section. Frogmore Mill, the Paper Trail, and the canal infrastructure with which they are associated could form the basis of a strong future vision for the economic development of this part of the town, but it is entirely missing.</p> <p>There is also on passing reference to the enhancement of green spaces and the Grand Union Corridor, as well as the River Grade. The above points were made previously in earlier representations by the Trust, and the Trustees would have hoped that these green resources might be given more emphasis in the proposed vision for Hemel Hempstead in this latest version of the Core Strategy.</p> <p>It is suggested therefore that it would be appropriate to develop a new policy CS35 which would set out a series of targets and objectives for Apsley, and Apsley Mills in particular. This would demonstrate that the Council has a current and long term vision for this area, and is not reliant solely on an</p>			

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													<p>out of date Local Plan for that referencing.</p> <p>In any such new Policy, Apsley Mills as an area should be identified as a focus of the continued development of mixed use schemes to be brought forward, with residential being a strong component of any such mixed use scheme in order to maximise viability and deliverability. This approach is justified also in relation to the Council's own assessment of</p> <p>TWA7 site, in the recent Strategic Housing Land Availability Assessment (SHLAA) study under site ref APS58.</p>			
627210	Mr Terry Douris					Hemel Hempstead Place Strategy	Section 20, Local Objectives In East Hemel Hempstead - to deliver	20	Objecting	Yes	No	a) Justified	Finally, I would suggest that space provision for only one primary school will be insufficient. Although technically it might be for 1,000 house I believe that there is evidence to show that North East Hemel Hempstead will be significantly short of primary school places within the foreseeable future and provision for a greater number of schools will be required within the life of the Core Strategy.		No, I do not wish to participate at the oral examination	
211072	Ms Katherine Fletcher	English Heritage				Paragraph	20.4	20.4	Objecting	Yes	No		It could also be mentioned here that the new town contains noteworthy features from the original new town, although their significance is not always apparent. These give Hemel Hempstead its distinctiveness and they can contribute to the regeneration process, as an integral part of the town's identity.			
610834	Mr Norman Thomas Jones					Paragraph	20.5	20.5	Supporting	Yes	Yes		Particularly support the policy on green spaces.		No, I do not wish to participate at the oral examination	
2110	Ms	English				Paragraph	20.5	20.5	Objecting	Yes	No		We suggest the following			

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72	Katherine Fletcher	Heritage							g	s			<p>amendments -</p> <p>1. Town Centre - add "...the public environment, whilst recognising and incorporating its features of architectural, historic and communal distinctiveness".</p> <p>2. Neighbourhood Centres - add "...neighbourhood local centres whilst conserving their individual architectural, historic and communal distinctiveness".</p>			
224725	Mr Neil Clemmens					The town	Hemel Town Vision	Statement Vision 1	Objecting	Yes	No		<p>The local infrastructure cannot support more housing.</p> <p>Hemel Hempstead unable to accommodate future development.</p>			
620322		West Herts College	620319	Ms Alison Tero	CBRE	The town	Hemel Town Vision	Statement Vision 1	Objecting	Yes	No		<p>WHC recommends that the 2nd and 3rd sentences of 'The town' vision should be re-worded to better align the vision with PPS4 objectives for planning for sustainable economic growth; the Government's 'Planning for Growth' Statement outlined by the Minister of State for Decentralisation in March 2011; and the Draft national Planning Framework as follows:</p> <p>Its long-term strategy as the focus for development will be to meet the housing requirements of the borough and to plan for the sustainable growth and prosperity of the town centre, its residents and business.'</p>		Yes, I wish to participate at the oral examination	
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	East Hemel Hempstead	East Hemel Vision	Statement Vision 3	Supporting	Yes	Yes		USS supports the retained vision for East Hemel Hempstead as it seeks to be the home to a vibrant, dynamic and premier business-led community.			
503294	Chris Shaw	Highways Agency				East Hemel Hempstead	Section 20 East Hemel	Statement	Objecting	Yes	No		Please see hard copy for further information.	If the Highways Agency proposes the following additional text is	No, I do not wish to	

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							Hempstead	Vision 3					<p>The Highways Agency notes that text on page 165 of the plan indicates that the purpose of the proposed North Eastern Relief Road is to enable better lorry access to and circulation around Maylands Business Park, and improve links to the proposed Spencer's Park residential development. The exact timing of the relief road in context with the build-out of East Hemel Hempstead development is not considered in the plan, although the Highways Agency recognises that this may be given more consideration in the forthcoming East Hemel Hempstead Area Action Plan.</p> <p>The Highways Agency is concerned that the traffic reassignment effects of the proposed relief road have not been fully justified. Whilst the intention of the relief road may be to facilitate development at Maylands, the route could improve access to the M1 for all road users and this could result in additional traffic at M1 Junctions 7 and 8. If this assessment work has not been undertaken, evidence should be provided to support the plan and the forthcoming East Hemel Hempstead Area Action Plan. In soundness terms, this evidence would help to justify what the impact is to the strategic road network.</p>	<p>inserted:</p> <p>"The proposed North Eastern Relief Road will be subject to a Transport Assessment which considers the traffic effects on the surrounding road network including the M1, and setting out , where necessary, mitigation measures to ensure that if the capacity of the Strategic Road Network is exceeded, that the Strategic Road Network is „no worse off' than if the development did not take place, as specified in DfT Circular 02/2007. "</p>	participate at the oral examination	
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Paragraph	20.6	20.6	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective or consistent with national policy.</p> <p>Hemel Hempstead Page 106 - Table 8 / Page 167 - Para 20.6:</p>			

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													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.			
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Boyer Planning	Paragraph	20.6	20.6	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy. The first sentence of the paragraph requires amendment to reflect the increasing housing provision needed at Hemel Hempstead- See Section Three of Statement and separate representation regarding Policy CS17.	The first sentence of para 20.6 should be amended to read: "Hemel Hempstead will accommodate around 11,070 new homes, 82% of the Borough's total required provision."	Yes, I wish to participate at the oral examination	Significant issue relating to housing provision spatial strategy, Hemel Hempstead Place Strategy.
633312	Mrs Patricia Bramley					Paragraph	20.9	20.9	Objecting	Yes	No		I feel that a bus service should be reinstated in the Old Town Hemel within the policy connecting the Town Centre to the rail station.			
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	20.12	20.12	Objecting	Yes	No		The presence of heritage assets with archaeological interest which are potentially of national importance are likely to be a constraint on the extent and/or design of development in parts of the following zones: Hemel Old Town and Marlowes. Reasons: The area of the medieval settlement of Hemel Hempstead is centred along the High Street north of Queensway. The Scheduled remains of the Charter Tower (SM HT55) lies west of the High Street. The area of the historic core is of high value in terms of heritage assets with historic and archaeological interest, both historic above ground structures and below			

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													ground archaeological deposits.			
211072	Ms Katherine Fletcher	English Heritage				Paragraph	20.13	20.13	Objecting	Yes	No		It would be helpful to add: 'The different components or character zones should be seen as each contributing different values to the town centre and complementing each other. Interconnectivity is essential, as is the retention of the different physical, townscape and historic characters. This especially relates to scale, which could be compromised by insensitive development adjoining a character zone.'			
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	20.13	20.13	Supporting	Yes	Yes		The Riverside scheme is now included as part of the Marlowes define shopping area- this amendment is supported as it strengthens the role of the Hemel as a whole and reinforces the retail focus of the centre.			
607431	Mrs Kate Harwood	Hertfordshire Gardens Trust					Box Figure 17	Box Figure 17	Supporting	Yes	Yes		The Jellicoe Gardens are one of the most important mid-20th century gardens in Britain and amongst the most important in Europe, recognised as such by English Heritage by being included on their <i>Register of Parks and Gardens of Special Historic Interest</i> . These important gardens are neglected and subject to threat of development. Restoration of these gardens would give back the focus to Hemel town centre and reinstating the links between the Marlowes and the Water Gardens, together with removal of unsightly piecemeal development would fill in the link between the historic Gadebridge Park and the historic industrial landscapes of the Gade Valley at Apsley and Frogmore, providing an historic thread through		No, I do not wish to participate at the oral examination	

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													the town.			
3339 91	Mrs Christa Masters	STANDARD LIFE INVESTMENTS LTD C/O MONTAGU EVANS LLP	3339 85	MRS CHRISTA MASTERS	STANDARD LIFE INVESTMENTS LTD C/O MONTAGU EVANS LLP		fig17	Box Figure 17	Supporting	Yes	Yes		The Marlowes is now identified as the prime retail pitch which is to be welcomed and supported.			
2110 72	Ms Katherine Fletcher	English Heritage					Figure 17	Box Figure 17	Objecting	Yes	No		<p>Old Town - Add: There is especially a need to conserve and enhance the character of the public realm and avoid encroachment by insensitive changes especially signs and traffic related features.</p> <p>Original Old Marlowes - Add: This area acts as a pivot between old and new town. It has the potential to become an enhanced series of spaces in its own right, with high quality buildings and the impact of traffic managed sympathetically.'</p> <p>Jellicoe Water Gardens- Add: The gardens were innovative, specifically in their use of concrete structures and decoration and noted for the naturalistic planting. It is one of the few surviving post war public landscapes specifically designed as part of the new town movement. It has the potential again to become a visitor attraction and outstanding public space, but the scale of surrounding new development must not be allowed to compromise its special character.' With regard to the Water Gardens, we have been in recent correspondence regarding potential development proposals which we consider would result in significant harm.</p>			
3983 69	Mr Charles Staveley	Capital & Regional Plc	6199 06	Mr Jonathan Best	Blue Sky Planning		Figure 17	Box Figure 17	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>This representation concerns the</p>	Capital & Regional considers that the Hemel Hempstead Vision Diagram should identify Jarman Fields as a local centre with a district shopping function.	Yes, I wish to participate at the oral examination	Jarman Fields is an important commercial location within the Borough.

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													Hemel Hempstead Vision Diagram. For the reasons set out in the representation of Tables 5 and 6. Capital & Regional considers that the Hemel Hempstead Vision Diagram should identify Jarman Fields as a local centre with a district shopping function.		n	
620322		West Herts College	620319	Ms Alison Tero	CBRE		Figure 17	Box Figure 17	Objecting	Yes	No		WHC support the identification of the 'Gade Zone' for significant regeneration but it considers that the mix of uses promoted within this zone are too narrowly drawn. WHC seek the broadening of the mix of uses to include food and drink, offices, retail, leisure and hotel opportunities. This area is part of the Town Centre, and as such a full range of town centre uses should be supported. Flexibility in terms of the range of uses will be necessary to ensure the regeneration and delivery of a new college facility on its existing site is achieved within the plan period.		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.
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	20.14	20.14	Objecting	Yes	No		The presence of heritage assets with archaeological interest which are potentially of national importance are likely to be a constraint on the extent and/or design of development in parts of the following zones: Spencer's			

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													<p>Park, Face of Maylands, Service Centre and Maylands Gateway.</p> <p>Reasons:</p> <p>Spencer's Park has been identified as possessing high potential for the presence of heritage assets of archaeological interest, particularly relating to the Roman period. This may be a constraint on the extent and/or design of development</p> <p>A Scheduled Roman temple complex (SM27921) is sited in the area of Hales Park. This is surrounded by an area of known and high potential of later prehistoric and Romano-British occupation.</p> <p>A large Scheduled Roman burial mound (SM 27901) is situated near the corner of High Street Green and Queensway. The area around this monument possesses high potential for the presence of heritage assets of archaeological interest.</p>			
211068	Mr Nick Harper	The Crown Estate	210968	Ms Helena Deaville	AMEC	Paragraph	20.17	20.17	Objecting	Yes	No	b) Effective	The Core Strategy is considered to be unsound and is not effective from a delivery perspective, specifically in relation to cross boundary issues. There are a number of cross boundary issues relating to land immediately to the east of Hemel Hempstead in St. Albans which have not yet been resolved with St. Albans. The eastern side of Hemel Hempstead is physically constrained by a local authority boundary that is very tightly drawn	If Dacorum has sufficient evidence of agreement with St. Albans District Council regarding joint working and agreement on the boundary of the East Hemel Hempstead AAP and how it has been arrived at, then this should be clearly referenced in the Plan and made available as part of the evidence base. If this has not been sufficiently agreed, then this should be undertaken before progressing the Core Strategy	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 beyond. The Crown Estate has worked closely

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													<p>around the urban edge and does not allow for expansion of residential or employment areas.</p> <p>There are brief references to cross boundary issues, such as at paragraph 1.11 which refers to facilities that may require extending into St Albans. Paragraph 21.17 states that the East Hemel Hempstead AAP will explain opportunities for cross boundary regeneration projects, the delivery of high quality housing, facilities and services, and countryside access and</p> <p>strategic landscape improvements. There is reference to Spencer's Park extending into St. Albans in Figure 18, and Figure 22 shows the AAP boundary within St. Albans. This boundary appears to be rather ad hoc and there does not appear to be any evidence in support of why this particular boundary has been drawn, or whether this boundary has been agreed with St. Albans. In the absence of any specific evidence it would be more appropriate to consider the M1 as the boundary to both the north and south of the area at this stage. This provides greater flexibility for the development of the AAP.</p> <p>It is appreciated that the AAP itself will be the mechanism for dialogue between the authorities, but as far as The Crown Estate is aware there has not been any agreement with St. Albans regarding joint working to assist Dacorum in meeting its development needs on the eastern edge of Hemel Hempstead. Whilst this is a matter for the AAP, the principle must be agreed through the Core Strategy.</p>	<p>further.</p> <p>Working arrangements and discussions with St. Albans about cross boundary issues could have a significant impact on the growth strategy of the Core Strategy (see also The Crown Estate's representation relating to the consideration of alternative options) and therefore must be resolved prior to submission of the Core Strategy.</p>		<p>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 very concerned that cross boundary opportunities for sustainable development are not being considered further in the Core Strategy because there has not been clear and fully cooperation between Dacorum and St. Albans regarding the growth needs of Dacorum.</p>

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													<p>The Planning Inspectorate guidance 'Examining Development Plan Documents: Learning from Experience' September 2009 states at paragraph 29 that "A conflict between authorities about cross boundary dependencies is likely to lead to a finding of unsoundness for all the strategies involved." Paragraphs 4.16 to 4.18 of PPS12: Local Spatial Planning encourage LPAs to exploit opportunities for joint working.</p> <p>Importantly, the Localism Bill which has recently received Royal Assent contains a 'duty to cooperate' which is applicable to Dacorum and St. Albans. Paragraph 46 of the Government's Draft National Planning Policy Framework (NPPF) states that local planning authorities (LPAs) will be expected to demonstrate evidence of having successfully co-operated to plan for issues with cross-boundary impact when their Plans are submitted for examination and that this evidence could be plans or policies prepared as part of a joint committee, a memorandum of understanding or jointly prepared strategy as evidence of an agreed position.</p> <p>This should not be left until the AAP stage as it is key to the Core Strategy. The Duty to Cooperate is about much more than meetings and discussions between authorities. It is about meaningful co-operation to assist authorities in meeting their needs in the absence of strategic guidance to deal with cross boundary issues. This is particularly important in Dacorum and St. Albans following the quashing of the relevant parts of the East of England Plan that dealt with</p>			

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													<p>cross boundary development.</p> <p>At paragraph 47, the Draft NPPF refers to joint working enabling LPAs to work together to meet development requirements which cannot wholly be met within their own areas. Sensible and sustainable planning does not stop at local authority boundaries, and given that the eastern edge of Hemel Hempstead is very constrained by a tightly drawn boundary, there is a clear need for St. Albans to co-operate and work with Dacorum to assist Dacorum in meeting its development needs for employment, residential and community uses in suitable sustainable locations. For instance, The Crown Estate has received significant interest from companies wanting to locate to the area between the Buncefield Oil Depot and the M1 which is included within the East Hemel Hempstead AAP area. There is a need for effective joint working between authorities to resolve issues such as this and to ensure that both local authorities can gain from new employment in the area. Please refer to representations regarding the distribution of development/alternatives for more detail on this.</p> <p>Please note that this representation should also be read alongside The Crown Estate's representation relating to the consideration of alternative options as the issues are closely linked.</p>			
618782	Mr John Thompson	Brixton Properties Limited	618783	Miss Alyson Jones	Barton Willmore		Figure 18	Box Figure 18	Objecting	Yes	No	a) Justified	<p>It is not Sound as it is not Justified, Effective or Consistent with national policy.</p> <p>We do not consider that the reference to the Table set out in</p>	Figure 18 should be amended to establish greater flexibility so as to include B2 and B8 uses in the Face of Maylands and therefore be consistent with the adopted Maylands Masterplan.	No, I do not wish to participate at the oral examination	

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													<p>Figure 18 in Policy CS34 is justified, effective or consistent with national policy. If the table is to form part of the Policy then Figure 18 should be included in the Policy, however we are concerned that the proposed wording adds policy weight to Figure 18 which may limit development at Malyands Business Park.</p> <p>However, there is an inconsistency between the proposed Figure 18 wording and that set out in the adopted Maylands Masterplan (2007) for the Face of Maylands Zone. Paragraph 2.4.4 of the Maylands Masterplan states, in reference to the 'Face of Maylands', that: "whilst office-led, there is more scope in the northern part of this area for other forms of development, such as B2 (General Industrial) or B8 (Storage or Distribution) uses, provided it is designated to meet the guidelines illustrated below".</p> <p>The guidelines set out in the Maylands Masterplan then explain that, for example, the office element of a B2 use should be located at the front of a unit.</p> <p>The wording of the adopted Maylands Masterplan should be adopted, which allows to B1(c), B2 and B8 helps make the site more attractive to the market.</p>			
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte		Figure 18	Box Figure 18	Supporting	Yes	Yes		<p>USS continues to support the development opportunities identified for these areas.</p> <p>The Face of Maylands' character area includes a range of large office buildings and is expected to be a core office location suitable for HQ offices and large organisations. In</p>			

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													<p>addition, there is scope for general industrial, storage and distribution uses in less prominent areas.</p> <p>The Engine Room' character zone includes a mix of industrial and commercial uses, as well as more flexible business uses and should continue to offer these uses in the future. USS supports the development opportunities for this area as it also accommodates a range of employment generating uses locally.</p>			
503294	Chris Shaw	Highways Agency					Fig 18	Box Figure 18	Objecting	Yes	No		<p>Please see hard copy for further details.</p> <p>The Highways Agency acknowledges the potential benefits of Park and Ride, especially for example at broad location proposed where there may be potential to combine it with a public transport hub and a site-wide Travel Plan package of sustainable transport measures, if this is indeed the vision. Whilst it is recognised that more detail of the potential Park and Ride facility should be provided as part of the forthcoming East Hemel Hempstead Area Action Plan, the Highways Agency wishes to stress early-on the need for more detailed assessment to accompany a Park and Ride facility proposal, including a Transport Assessment, which considers the traffic effects on the M1 at Junctions 7 and 8. In soundness terms, this evidence would help to justify what the impact is to the strategic road network.</p> <p>Also, the Highways Agency notes that Park and Ride is not specified under Policy CS34 and queries whether the facility is a firm proposal by Dacorum Borough Council.</p>	<p>The Highways Agency proposes the following additional text to be inserted in Figure 18:</p> <p>"The Park and Ride facility will be subject to a Transport Assessment which considers the traffic effects on the surrounding road network including the M1, and setting out , where necessary, mitigation measures to ensure that if the capacity of the Strategic Road Network is exceeded, that the Strategic Road Network is „no worse off' than if the development did not take place, as specified in DfT Circular 02/2007. "</p>	No, I do not wish to participate at the oral examination	

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625729		VALAD Property Group	625727		Indigo Planning Ltd		Figure 18	Box Figure 18	Objecting	Yes	No	b) Effective	<p>We consider the Core Strategy to be unsound as Figure 18 contains a statement which does not incorporate sufficient flexibility in the uses suggested for land between Boundary Way and Buncefield Lane including the site of the former Fuji Building.</p> <p>At present the uses envisaged at this location are restricted to storage, distribution and warehousing. In the event that the site if the Former Fuji Building is not located within the Health and Safety Executive's 'Development Proximity Zone', office use would still be an acceptable use at this location. Please see accompanying letter for further details.</p>	<p>Paragraph 13 of Figure 18 needs to be more flexible in terms of the types of use envisaged on land between Boundary Way and Buncefield Lane. It is requested that the paragraph is revised to state:</p> <p><i>" A strip of between Boundary Way and Buncefield Lane was an office location affected by the Buncefield explosion: this land may be converted to storage, distribution and warehousing. Offices may also be acceptable if a site falls outside the Health and Safety Executive's Development Proximity Zone."</i></p> <p>This revision will ensure the Core Strategy document is sound and effective as it will incorporate sufficient flexibility into the wording of the document. It will facilitate the redevelopment of the land thus aiding economic recovery and the regeneration of the area.</p> <p>The East Hemel Hempstead Area Action Plan (AAP) will provide more detail and guidance on the future development in the area. It is requested that the Draft Core Strategy incorporates sufficient flexibility in the description under Figure 18 as policies within the AAP will flow from the Core Strategy.</p> <p>Widening the range of uses envisaged on this land will ensure that the future development of the site will not be unnecessarily hindered by the Core Strategy document.</p>	No, I do not wish to participate at the oral examination	
366491	Mr Brian					Hemel Hempstead Town Centre	CS33	Policy CS 33	Objecting	Yes	No	b) Effective	I suggest again that a performing arts venue is added to this line	Add the words 'performing arts venue' after the word 'library'		

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	Worrell															
211072	Ms Katherine Fletcher	English Heritage				Hemel Hempstead Town Centre	CS33	Policy CS 33	Objecting	Yes	No		Add to the end of part (h): '...which are in scale and sympathy with the character and significance of this heritage asset.'			
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	Hemel Hempstead Town Centre	cs33	Policy CS 33	Supporting	Yes	Yes		Support is expressed for this policy which supports additional retail stores within the Marlowes Shopping Zone.			
502874	Mr Chris Bearton	Hertfordshire County Council				Hemel Hempstead Town Centre	CS33	Policy CS 33	Objecting	No	No		<p>PPS12 (Para 4.45) and the draft NPPF require Core Strategies to make it clear how the infrastructure which is needed to support the strategy will be provided and to what extent it is consistent with other relevant plans and strategies.</p> <p>It is noted that all references to a relocated and covered bus station within the Hemel Hempstead Place Strategy have been removed. The County Council believes that the provision of a bus station is the most effective way to facilitate the operation of an integrated sustainable transport network for the town and the wider area and its inclusion within the Place Strategy would support the wider policies of the Local Transport Plan (LTP3) and its daughter documents.</p> <p>This approach reflects the need for Core Strategies to deliver cross-boundary strategic priorities as required by both PPS12 and the draft NPPF. The provision of a bus station rather than a bus interchange will also meet a number of the Strategic Objectives at both the Borough level and individual place strategies. Its inclusion would</p>	As a key piece of infrastructure, any reference to the provision of a 'bus station' that has been removed from the Hemel Hempstead Place Strategy should be reinstated. Furthermore, to reflect the recommendations of the Infrastructure Delivery Plan and the fact that the bus station has been identified as a Priority 1 project, and to inform the future development of the Hemel Hempstead Town Centre Area Action Plan, a bus station should be referenced under Section 2 of Policy CS33.	Yes, I wish to participate at the oral examination	

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													<p>therefore help meet the wider objectives of the Core Strategy.</p> <p>The provision of a bus station, facilitates the operation of services passing through the town which need to await time, and long distance and terminating routes which need to layover for longer periods. The delivery of a bus station would enable an effective interchange between services for passengers, the opportunity to provide a high quality environment which acts as the first point of access for people coming to the town and encourages the use of sustainable modes of transport. The delivery of a bus station would therefore support the wider strategy for growth in the town centre which is likely to be a major generator of travel demand within both the Borough and wider area (NPPF; 85).</p> <p>There are currently 29 bus routes that terminate at the bus station and it is difficult to see how these could be accommodated without such a dedicated facility. The importance of a bus station in delivering the strategic objectives in the Core Strategy is highlighted by its inclusion within the accompanying Infrastructure Delivery Plan (URS, 2011) and the Hertfordshire Infrastructure and Investment Strategy: Transport Report (URS, 2009). The delivery of a 'bus station' within the Hemel Hempstead town centre is identified as a Priority 1 project in the 2011 report, which "are infrastructure items that enable basic functionality (including for inter-urban commuters) and, if not provided have the potential to threaten the delivery of growth"</p>			

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													(p.63). In order to achieve the Strategic Objectives of the Core Strategy and help to deliver the wider strategic, public transport priorities in Hertfordshire, any form of revised bus interchange arrangement for the town centre should include a bus station that takes into account current bus service provision, the scale of development envisaged for the town and be designed to be as future proof as possible. There are similar concerns with the provision of non B-Class uses within the Hemel Hempstead Town Centre. In light of the pressures experienced at peak times of travel on the primary road network serving the town centre, it is considered that some key infrastructure proposals and how they are likely to be funded / implemented have been omitted from the IDP (see representation form for <i>Implementation and Delivery</i>). Some additional traffic modelling is likely to be required to inform the proposals as there will be differing levels of trip generation and highway network issues that maybe highlighted by the model collectively rather than assessing each site independently.			
211041	Ms Rose Freeman	The Theatres Trust				Hemel Hempstead Town Centre	CS33	Policy CS 33	Supporting	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. Comments The document uses descriptive terms which are not consistent. Social, leisure, cultural and community facilities are mixed up in	No, I do not wish to participate at the oral examination		

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												<p>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 intended outcomes.</p> <p>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></p> <p>We also find the document unnecessarily long and although it does not undermine the soundness of the CS, it obscures its key themes and entails repetition.</p>				
503294	Chris Shaw	Highways Agency				Hemel Hempstead Town Centre	CS 33	Policy CS 33	Objecting	Yes	No		<p>Please see hard copy for further information.</p> <p>Paragraph 20.9 of the plan sets out the intention to improve public transport services between Hemel Hempstead town centre, Maylands Business Park and the main railway station. The Highways Agency</p>	<p>The Highways Agency recommends that the following additional text to be inserted in Policy CS33 and Policy CS34 under 'movement':</p> <p><i>“(x) provide enhanced public transport links between Hemel Hempstead Town Centre, Railway Station and Maylands Business Park”</i></p>	<p>No, I do not wish to participate at the oral examination</p>	

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													welcomes this proposal and considers it to be crucial in helping to ensure the Maylands Business Park and its future expansion is well-connected to the surrounding population and that people have the choice to travel by non-car modes. The Highways Agency notes however that this proposal is not referenced in either Policy CS33 or Policy CS34.			
620322		West Herts College	620319	Ms Alison Tero	CBRE	Hemel Hempstead Town Centre	CS33	Policy CS 33	Objecting	Yes	No		<p>WHC considers that Policy CS33 should be revised to ensure that it is sufficiently flexible to respond to development opportunities which would enhance the overall vitality and viability of the town centre. A policy which is too prescriptive could frustrate the future regeneration of the town centre.</p> <p>In particular, the policy is silent on the regeneration opportunities within the town centre. We consider this specifically needs addressing within the policy. In addition, we consider that Principles 1: Use, is too narrowly defined and should state that a range of uses within the town centre will be supported, having regard to PPS4, in order that regeneration objectives can be delivered.</p> <p>WHC seeks the revision to the policy to reflect the acceptability of development proposals coming forward before adoption of a delivered Masterplan where they accord national policy guidance.</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) 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.
610882		Stanhope Plc and Aviva	610880	Mr Philip	Planning Perspectives	Maylands Business Park	Policy CS 34: Maylands Business Park	Policy CS 34	Objecting	No	No	c) Consistent with national	The identification of the Maylands Business Park as an area of regeneration and a location for the development of a significant amount	Given the above, it is considered that Policy CS34 part 1 (a) should read " <i>adopt a flexible approach to development to secure</i>	Yes, I wish to participate at the oral	This policy will have a direct impact on the Peoplebuilding

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				Allard								policy	<p>of new office development is welcomed. However, there is concern that its identification as a "green business park" (paragraph 4.4) could be unduly restrictive and inflexible for businesses. The Policy needs to be sufficiently flexible to allow alternative employment generating uses to come forward. The over supply of offices and lack of demand for offices will mean that the Gateway sites will remain undeveloped otherwise.</p> <p>It is considered that strategic planning policies should not be prescriptive and should instead be flexibly worded so that they can adapt to the needs of business rather than imposing a straight jacket on development. This should be acknowledged in the Vision for the Maylands Gateway as described in Figure 18 and Policy CS34. We explained in our paper to the Council earlier this year, that the Peoplebuilding Office park has had limited interest from potential occupiers over the last 9 years and as a consequence only one office building (which remains 40% vacant) and the health centre have been built out. Current advice indicates that this will not change in the medium to long term. As noted in 'The Plan for Growth' published by the Government, radical changes are required to the planning system to assist with the support of job creation. PPS 4 (Planning for Sustainable Economic Development) identifies that a broadened definition of economic development would not restrict development to the B Use Classes.</p>	<p><i>employment generating uses within a variety of use classes in an open land setting in Maylands Gateway</i>". As economic indicators continue to show that demand for offices is unlikely to return in the medium to long term in this area, other use classes must be explored to encourage regeneration. The following objectives of the Core Strategy will only be met if a diversification of employment uses is permitted in the Maylands Gateway area and on the Peoplebuilding site in particular:</p> <p>Challenge 2 - Strengthen the role of Maylands Business Park' (identified in paragraph 4.4); Dacorum 2031: A Vision' (page 33); Identifying Hemel Hempstead as a Main Centre for Development and Change (Table 1: Settlement Hierarchy); and Table 4: Economic Development Strategy Objectives (page 84).</p>	examination	site, a key site within the Maylands Business Park.
211055	Mr Matthew	Hertfordshire County Council				Maylands Business Park	CS34	Policy CS 34	Supporting	Yes	Yes		The reference within Policy CS34 (criteria 1 (e) relating to the need to secure better waste management facilities' is a very positive statement		Yes, I wish to participate at the oral	It is considered that it would be helpful to DBC if officers from

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	Wood												acknowledging the needs of Waste Management Unit colleagues to achieve a replacement/enlarged HWRC to serve the Hemel Hempstead area within the plan period.		examination	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.
498429	Steve Baker	CPRE - The Hertfordshire Society				Maylands Business Park	CS34	Policy CS 34	Objecting	Yes	No	a) Justified	The proposed major increase in office floorspace in Hemel Hempstead is at odds with the very high amount of empty office accommodation, believed to be over half a million square feet. If this vacant floorspace is unsuitable for office use, in appropriate locations an option should be its redevelopment or conversion to residential accommodation as one	To be agreed with the 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.

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													alternative to the future development of Green Belt sites.			
502874	Mr Chris Bearton	Hertfordshire County Council				Maylands Business Park	CS34	Policy CS 34	Supporting	Yes	Yes		<p>It is encouraging that Policy CS34 seeks to secure better waste management facilities within Maylands Business Park as a principle guiding development in that particular area. Para 18.39 of the Core Strategy states; 'The planning system has a role to play in the minimisation of waste at or near source and in disposal of household, commercial and construction waste. Unnecessary waste should be reduced and managed nearer to its source. To avoid unnecessary waste going to landfill sites, developers will be expected to avoid potentially polluting developments, the creation of additional waste, and the location of new development near existing sources of pollution. This may involve the relocation of the existing Household Waste Recycling Centre and Waste Disposal Centre as part of a new Energy and Waste Park in the Maylands Business Park area.'</p> <p>It appears that policy CS34 could cover the need for a replacement/enlarged Household Waste Recycling Centre (HWRC) to serve the Hemel Hempstead area to ensure the delivery of an effective service provision of HWRCs across the county. Whilst the Waste Planning Authority accepts the acknowledgement of the potential need for waste management facilities, the final detail regarding the service delivery of HWRCs should be discussed between the Waste Disposal Authority and Dacorum Borough Council with the aid of the Waste Site Allocations DPD within which there are Employment Land Areas of Search</p>			

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													identified in the Maylands Area. Reference to an 'energy and waste park' in the Maylands Business Park is a positive addition to the Core Strategy and from the Waste Planning Authority's perspective this can only be supported to ensure that waste is managed effectively. The potential for a waste park could be a positive way of providing this provision and is covered by policy within the Waste Core Strategy and Development Management Policies DPD.			
502874	Mr Chris Bearton	Hertfordshire County Council				Maylands Business Park	CS34	Policy CS 34	Objecting	No	No		PPS12 (Para 4.8) and the draft NPPF require Core Strategies to be supported by evidence of what infrastructure is needed to enable the amount of development proposed for the area , including (amongst other things) infrastructure needs, costs and finding sources. The preparation of an Infrastructure Delivery Plan (IDP) to help the delivery of the Core Strategy is supported and the intention for ongoing engagement with Service providers welcomed. However, in relation to transport infrastructure, it is considered that the IDP underestimates the level of strategic infrastructure required to support growth (and will need to be funded through new development) in response to the recommendations of the Hertfordshire Infrastructure and Investment Strategy (HIIS) and the Hemel Hempstead Urban Transport Plan (UTP). Furthermore, there is concern that the IDP refers to some of the interventions as "existing planned interventions". These interventions do not appear to have been priced as strategic improvements of which	Funding sources for essential transport infrastructure identified in the HIIS, Urban Transport Plan and included in the IDP should be clarified to ensure deliverability.	Yes, I wish to participate at the oral examination	

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													<p>developments should contribute to.</p> <p>How infrastructure projects will be funded needs to be clearly set out so that it can be determined whether or not the growth levels within the Core Strategy are deliverable in transport terms. Therefore the discrepancy between the cost estimates for infrastructure that should be funded by future development is of concern and it is not clear at this stage whether or not essential transport infrastructure can be delivered over the Plan period.</p> <p>In its current form, the IDP does not give sufficient certainty (in relation to transport) that the essential infrastructure identified in the IDP and Urban Transport Plan to support growth over the Plan period can be delivered. Subsequently, the Plan may therefore may not be deliverable as required by PPS12 (Para 4.52).</p> <p>The development proposals for Maylands Business Park, along with the findings of the Hertfordshire Strategic Employment Sites Study (2011) suggest that it is likely to provide a sub-regional employment facility. However, it appears that some of the transport provisions that are set out in the Hemel Hempstead Place Strategy do not appear to have been included in the IDP (see representation form for <i>Implementation and Delivery</i>).</p>			
618782	Mr John Thompson	Brixton Properties Limited	618783	Miss Alyson Jones	Barton Willmore	Maylands Business Park	CS34	Policy CS 34	Objecting	Yes	No	a) Justified	<p>It is not Sound as it is not Justified, Effective or Consistent with national policy.</p> <p>We do not consider that the reference to the Table set out in Figure 18 as referenced in the</p>	<p>Policy CS34 should either provide a specific policy position on the appropriate uses for the difference zones within Maylands Business Park or if the Policy continues to cross reference the Table in Figure 18, then the Table in Figure 18 should be amended to</p>	<p>No, I do not wish to participate at the oral examination</p>	

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													<p>policy is justified, effective or consistent with national policy. If the table is to form part of the Policy then Figure 18 should be included in the Policy, however we are concerned that the proposed wording adds policy weight to Figure 18 which may limit development at Malyands Business Park.</p> <p>However, there is an inconsistency between the proposed Figure 18 wording and that set out in the adopted Maylands Masterplan (2007) for the Face of Maylands Zone.</p> <p>Paragraph 2.4.4 of the Maylands Masterplan states, in reference to the 'Face of Maylands', that: "whilst office-led, there is more scope in the northern part of this area for other forms of development, such as B2 (General Industrial) or B8 (Storage or Distribution) uses, provided it is designated to meet the guidelines illustrated below".</p> <p>The guidelines set out in the Maylands Masterplan then explain that, for example, the office element of a B2 use should be located at the front of a unit.</p> <p>The wording of the adopted Maylands Masterplan should be adopted, which allows to B1(c), B2 and B8 helps make the site more attractive to the market.</p> <p>It is not considered that the requirement of CS34 Clause 3 (c) to "deliver district heating and additional large-scale/high capacity renewable energy generation technologies" has been justified, particularly in the context of its potential impact on the viability</p>	<p>establish greater flexibility so as to include B2 and B8 uses in the Face of Maylands and therefore be consistent with the adopted Maylands Masterplan.</p> <p>Suggested wording for clarifying Clause 3 (c):</p> <p>"Deliver district heating and additional large-scale/high capacity renewable energy generation technologies. Viability Assessments should be provided where it is evident that this requirement will prohibit development in the identified area."</p>		

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													<p>implications for future redevelopment of the effected plots.</p> <p>There should be recognition in the policy wording for a viability assessment to be undertaken to ensure that development is not prevented through the enforcement of these measures and to enable applications to be assessed to ensure the delivery of the ongoing improvements to Maylands Business Park.</p> <p>There is no clear guidance as to how this measure will be delivered and where the plant etc is to be located and therefore which plots will specifically be affected. Greater clarity is required in this regard.</p>			
501698		USS	625407	Miss Jayme Radford	Drivers Jonas Deloitte	Maylands Business Park	CS34	Policy CS 34	Supporting	Yes	Yes		USS supports policy CS34 as it seeks to meet relevant opportunities for zones within Maylands Business Park.			
503294	Chris Shaw	Highways Agency				Maylands Business Park	CS 34	Policy CS 34	Objecting	Yes	No		<p>Please see hard copy for further details.</p> <p>The Highways Agency seeks evidence which indicates the level of impact of all proposed development allocated to Maylands Business Park and East Hemel Hempstead. The plan suggests that a large proportion of new jobs will be focused at the Maylands site and this could therefore have the potential to generate significant traffic volumes on the surrounding road network, including the A414 and M1. The Highways Agency would like an assessment of the traffic impact of all proposed development at Maylands / East Hemel Hempstead on M1 Junctions 7 and 8. The potential interaction between the A414 Breakspear Way-Green Lane roundabout with the M1</p>	<p>The Highways Agency proposes the following additional text is provided under 'movement' within Policy CS34:</p> <p>"A Transport Assessment(s) is required to assess the traffic impact of all proposed development at Maylands and East Hemel Hempstead on the operation of M1 Junctions 7 and 8. Assessment of these junctions should also include the merges and diverges to the M1 mainline carriageway. Additionally, assessment should consider the potential interaction between the A414 Breakspear Way-Green Lane roundabout and the M1. Where necessary, the assessment should set out mitigation measures to ensure that if the</p>	No, I do not wish to participate at the oral examination	

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													<p>junctions is also of interest. Where necessary, assessment work should outline mitigation measures to ensure that if the capacity of the SRN is exceeded, that the SRN is 'no worse off' than if the development did not take place.</p> <p>Paragraph 20.9 of the plan sets out the intention to improve public transport services between Hemel Hempstead town centre, Maylands Business Park and the main railway station. The Highways Agency welcomes this proposal and considers it to be crucial in helping to ensure the Maylands Business Park and its future expansion is well-connected to the surrounding population and that people have the choice to travel by non-car modes. The Highways Agency notes however that this proposal is not referenced in either Policy CS33 or Policy CS34.</p>	capacity of the Strategic Road Network is exceeded, that the Strategic Road Network is „no worse off' than if the development did not take place, as specified in DfT Circular 02/2007. "		
621338		Total Pension Trustee	619906	Mr Jonathan Best	Blue Sky Planning	Maylands Business Park	CS34	Policy CS 34	Supporting	Yes	Yes		<p>Total Pension Trustees owns land at the Heart of Maylands and has held discussions with Officers regarding the potential future uses of it.</p> <p>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.</p> <p>Notwithstanding its support for the proposed local centre, Total Pension Trustees recognises that development of new local is often difficult to achieve and there</p>		Yes, I wish to participate at the oral examination	

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													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.			
623313	Mr John Clark	CBRE Global Investors	623314	Mr Jon Stoddart	CBRE Ltd	Maylands Business Park	CS34	Policy CS 34	Supporting	Yes	Yes		<p>CBRE supports the Council's intention to deliver a local centre in the Heart of Maylands to support residents and workers. Our client looks forward to participating in the production of the East Hemel Hempstead Area Action Plan in due course.</p> <p>Whilst it is acknowledged in figure 18 that there will be housing in the 'heart of the Maylands' we would suggest that policy CS34 should make specific reference for the need to deliver approximately 250 homes in the heart of the Maylands and 1,000 units through the area.</p>			
607431	Mrs Kate Harwood	Hertfordshire Gardens Trust				Local Allocation 1: Marchmont Farm	Table LA1	Table LA1	Objecting	Yes	Yes	a) Justified	The area around Marchmont Farm is semi-rural and provides a green gateway to Hemel Hempstead. Marchmont Farm is the site of an historic park and garden and the proposed development not only adversely affects that but also is in opposition to the vision to enhance Dacorum's distinctive landscape character.		No, I do not wish to participate at the oral examination	
405255	Mr Michael Nidd					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	<p>The draft is unsound because it is in conflict with elements of other strategies within it, e.g. with:</p> <p>CS1, which requires no damage to be caused to the existing character of the settlement or the adjoining countryside, and requires compatibility with policies the Green Belt;</p> <p>CS4, which requires the maintenance the</p>	Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflicts between individual Strategies and the conflict with PPG2. It will also recognise the result of the first-round public consultation and this be consistent with the principles of the Localism Bill.	Yes, I wish to participate at the oral examination	

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													<p>maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulborne valleys which provide a strong landscape setting for the town.;</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views and out of towns and villages;</p> <p>CS11, which requires that development should respect the typical density intended in an area and to enhance the spaces between building and general character.</p> <p>The "Summary of Responses from the Public Consultation on the Emerging Core Strategy (June - August 2009)", which forms a part of the pre-submission draft, fails to make it clear (by airbrushing the results out altogether) that the housing targets which gave rise to Policy CS16 were rejected by more than two to one by Dacorum respondents. The Council's refusal to acknowledge this is counter to the principles of the Localism Bill.</p> <p>To suggest building 2 and 3 storey houses further down the slope of Marchmont Fields, especially where those in Grovehill West (Marlborough rise) were carefully designed with low-rise mono-</p>			

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													<p>pitched roofs specifically to protect the view from the Conservation Area and across the Gade Valley is inconsistent with all of these policies. It would also confer upon the houses in Grovehill West, particularly those in Marlborough Rise which at present enjoy open views over countryside, views akin to that of the Berlin Wall. Previous comments by the Planning Inspector which suggest that such houses could be screened by suitable planting take no cognisance of the topography of the site: unless dense forest of trees at least 25 metres high was envisaged. Any building on the suite would reduce what is, just a viable Green Belt into an almost meaningless Green G-String of less than 500 metres in width.</p> <p>It is not consistent with national policy, as set out in PPG2: There is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 para 3.14: "Planning obligations may be used to offset the loss of or impact on any amenity present on a site prior to development (see DOE Circular 16/91)". Further, para. 3.15 of PPG2 states that "The visual amenities of the Green Belt should not be injured by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reasons of their sitting, materials or design." It is also inconsistent with Ministers statements about preserving the Green Belt.</p>			
498429	Steve Baker	CPRE - The Hertfordshire Society				Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Consistent with national policy.	Revised total housing number for the town to be revised and changed in the text, and the local allocations removed from the text	Yes, I wish to participate at the oral	To ensure that the Inspector's Examination is fully informed of

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													The three Local Allocations are unnecessary and unjustified. All three are located within the Green Belt and their removal from the Green Belt would not only conflict with Green Belt policy but also Policy CS1, para 8.24 and policy CS10. Significant additional brownfield site capacity exists in the town and the total housing requirement should be based on the target of 9,835 included as Option 1 in the Draft Core Strategy and supported by CPRE Hertfordshire in respect of para 14.9.	and the Figures.	examination	the Planning Issues of concern to CPRE Hertfordshire.
618149	Mrs Julia					Local Allocation 1: Marchmont Farm		Table LA1								
618660	Mrs Julia Baird					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	CS10 which requires that development should respect defined countryside borders and the landscape character surrounding the Town or Village, and that it should protect and enhance significant views into and out of towns and villages.		No, I do not wish to participate at the oral examination	
619466	Mrs Mary Patricia					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	No	No	c) Consistent with national policy	The draft conflicts with elements of other strategies within it and is unsound. CS1 requires no damage to be caused to the settlement or adjoining countryside and requires compatibility with policies protecting the green belt. CS4 requires maintenance of the New Towns physical separation from a number of small villages and hamlets on its periphery and of the Gade and Bulbourne valleys. CS10 requires the development to respect defined countryside borders and the landscape character surrounding the town and villages. CS10 states that it should protect enhancing significant views into and out of towns and villages. CS11 which requires that development should respect the typical density intended in an area and to enhance the		No, I do not wish to participate at the oral examination	

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													spaces between buildings and general character. The public consultation in June-August 2009 which forms part of the pre-submission draft fails to make it clear that the housing targets which have rise to Policy CD16 were rejected by more than two to one.			
211658	Ms Victoria Lindsey	Piccotts End Residents Association				Local Allocation 1: Marchmont Farm	LA 1 (Marchmont Farm)	Table LA1	Objecting	Yes	No	c) Consistent with national policy			Yes, I wish to participate at the oral examination	Environment Issues
334422	Ms Penny Gore					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	The Draft is at odds with other parts of the stated plan. CS1. No damage should be caused to the character of the settlement/adjoining countryside, and it should be compatible with Green Belt protection policies. CS4. Maintenance of physical separation between the new town and hamlets/villages on its fringes; protection of the views and setting within the Bulbourne and Gade Valleys. CS10. Development should respect defined borders of countryside and landscape setting around the town/village; views around, into and out of towns/villages should be protected. CS11. Building density typical in an area should be respected so as to enhance the overall character and spaces separating buildings. It is also important to emphasise that the consultation process on the emerging Core Strategy - according to the summary of responses -	Remove any reference to Local Allocations LA1 and LA2. Removing these will eliminate the conflicts between other strategies as well as removing any conflict with PPG2. The removal of the references stated above will also ensure that the results of the public consultation have been recognised and are therefore compliant with the ethos of the Localism Bill.	No, I do not wish to participate at the oral examination	

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													<p>produced a clear rejection of policies proposed in the initial document.</p> <p>A point of particular concern to me, as a resident of Marchmont Farm, on the outer edge of Piccotts End, is the proposal to build 2 and 3 storey dwellings on the proposed site. This would create a looming profile which would be clearly visible from Piccotts End - and be totally out of keeping with the low-rise roofs of Marlborough Rise, which were specifically kept to a low level to protect the views across the Gade Valley. The proposal to build to 2 and 3 storey levels is not consistent with these policies.</p> <p>Further CS16 is not consistent with national policy, as set out in PPG2. There is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 paragraph 3:14.</p>			
334456	Mr Martin Cotton					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	<p>There is conflict within the draft, which makes it unsound:</p> <p>CS1 - requires no damage be caused to the existing character of the settlement on adjoining countryside, and also requires compatibility with policies protecting the Green Belt.</p> <p>CS4 - requires the New Town's separation, physically from a number of small villages and Hamlets on its edges, and the protection of the Gade and Bulbourne valleys, which provides a strong landscape setting for the town.</p>	Remove any and all references to Local Allocations LA1 and LA2. This will eliminate the conflicts between individual strategies, and the conflict with PPG2. It will also recognise the result of the first round of public consultation and so be consistent with the principles of the Localism Bill.	No, I do not wish to participate at the oral examination	
3345	Ms					Local Allocation	LA1	Table	Objecting	Yes	No	c)	The draft is unsound because it is in	Remove any references to Local		

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25	Sheila Pratt					1: Marchmont Farm		LA1	g	s		Consistent with national policy	<p>conflict with elements of other strategies within it, e.g:</p> <p>CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting the Green Belt.</p> <p>CS4, which requires maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulbourne valleys which provide a strong landscape setting for the town.</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views into and out of towns and villages.</p> <p>CS11, which requires that development should respect the typical density intended in an area to enhance the spaces between buildings and general character.</p> <p>The Summary of Responses from the Public Consultation on the Emerging Core Strategy' (June-August 2009), which forms a part of the pre-submission draft, fails to make clear that the housing targets which gave rise to Policy CS16 were rejected by more than two to one by Dacorum respondents. The Council's refusal to acknowledge this is counter to the principles of the Localism Bill.</p> <p>To suggest building 2 and 3 storey houses further down the slope of</p>	Allocations LA1 and LA2. This will eliminate the conflict between individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of the Localism Bill.		

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													Marchmont Fields, is inconsistent with all of the these policies. It is not consistent with national policy, as set out in PPG2: there is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 para 3.14: 'Planning Obligations may be used to offset the loss of impact on any amenity present on a site prior to development (see DoE Circular 16/11)'. Further, para 3.15 of PPG2 states that the visual amenities of the Green Belt should not be impaired by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design.'			
372215	Professor Robert Gates					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	No	No	c) Consistent with national policy	This draft is unsound and it conflicts with other strategies. I refer specifically to CS1, CS4, CS10 and CS11. The 2 or 3 storey houses proposed is inconsistent with all of the policies and that includes national policies.	Remove references to local allocations LA1 and LA2. This will eliminate conflicts between strategies and the conflict with PPG2. Further it will recognise that this is the result as a first round public consultation and be consistent with principles of the Localism Bill.		
398370	Mr Matt Richardson	Gleeson Strategic Land	621389	Mr Bob Sellwood	Sellwood Planning	Local Allocation 1: Marchmont Farm	LA1	Table LA1	Supporting	Yes	Yes		Gleeson and the HCA who, with the Borough Council control the whole of LA1 site support the allocation for approximately 300 dwellings. Attached is a Briefing Note on Marchmont Farm which demonstrates that it is an appropriate and deliverable site.		Yes, I wish to participate at the oral examination	Gleeson is promoting the local allocation site at Marchmont Farm (LA1).
484774	Dr Stanley Hartland					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	The draft is unsound because it is in conflict with elements of other strategies within it, e.g: CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting	Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflict between individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of	No, I do not wish to participate at the oral examination	

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													<p>the Green Belt.</p> <p>CS4, which requires maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulbourne valleys which provide a strong landscape setting for the town.</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views into and out of towns and villages.</p> <p>CS11, which requires that development should respect the typical density intended in an area to enhance the spaces between buildings and general character.</p> <p>The Summary of Responses from the Public Consultation on the Emerging Core Strategy' (June-August 2009), which forms a part of the pre-submission draft, fails to make clear that the housing targets which gave rise to Policy CS16 were rejected by more than two to one by Dacorum respondents. The Council's refusal to acknowledge this is counter to the principles of the Localism Bill.</p> <p>To suggest building 2 and 3 storey houses further down the slope of Marchmont Fields, is inconsistent with all of the these policies. It is not consistent with national policy, as set out in PPG2: there is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 para 3.14: Planning Obligations may be used</p>	the Localism Bill.		

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													to offset the loss of impact on any amenity present on a site prior to development (see DoE Circular 16/11)'. Further, para 3.15 of PPG2 states that the visual amenities of the Green Belt should not be impaired by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design.'			
620119	Mr Roger Crump					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	<p>The draft is unsound because it is in conflict with elements of other strategies within it, e.g:</p> <p>CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting the Green Belt.</p> <p>CS4, which requires maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulbourne valleys which provide a strong landscape setting for the town.</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views into and out of towns and villages.</p> <p>CS11, which requires that development should respect the typical density intended in an area to enhance the spaces between</p>	Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflict between individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of the Localism Bill.	No, I do not wish to participate at the oral examination	

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620256	Ms Trixi Field					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	<p>The draft is unsound because it is in conflict with elements of other strategies within it, e.g:</p> <p>CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting</p>	Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflict between individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of the Localism Bill.	Yes, I wish to participate at the oral examination	

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620269	Mrs Jennifer Nathan					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	<p>The draft is unsound because it is in conflict with elements of other strategies within it, e.g:</p> <p>CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting the Green Belt.</p> <p>CS4, which requires maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulbourne valleys which provide a strong landscape setting for the town.</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views into and out of towns and villages.</p> <p>CS11, which requires that development should respect the typical density intended in an area to enhance the spaces between</p>	Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflict between individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of the Localism Bill.	No, I do not wish to participate at the oral examination	

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621304	Mrs Jennifer Wright					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	<p>The Core Strategy is unsound because-</p> <p>CS1 - it does not protect the Green Belt. CS4 - it does not protect the Gade and the Bulbourne Valleys.</p> <p>CS10 - it does not protect the landscape and character surrounding</p>	PPG 2- not consistent with National Policy - "The visual amenities of the Green Belt should not be injured by development within an conspicuous from the Green Belt or be visually detrimental by reason of their sitting, materials or design".	No, I do not wish to participate at the oral examination	

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													Hemel Hempstead. CS11 - there will be too many buildings in a small space - including 3 storey.			
627210	Mr Terry Douris					Local Allocation 1: Marchmont Farm	LA 1	Table LA1	Objecting	Yes	No	a) Justified	I do have a concern, as a ward councillor for Grovehill regarding the East area housing development on the Marchmont Farm site. I would hope that every effort will be made to obviate the need for this development as I believe it will remove an important break between the Grovehill area and that of Piccotts End. I am also concerned to see that it is proposed that 3-storey properties be included. Whilst the area is on a natural slope this level of housing would create an unwelcome and intrusive vista. I also have concerns over vehicle access to this development, should it go ahead. It has been suggested that access might be via Marlborough Rise. This would be totally unacceptable as would any existing road system access from within Grovehill. I would argue that the only realistic access be from the Link Road which is already heavily congested in the morning peak.		No, I do not wish to participate at the oral examination	
632512	Miss Maggie Chandler					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	The draft is unsound because it conflicts with other strategies within it. The summary of responses from the public consultation on the emerging Core Strategy fails to make it clear that the housing targets which gave rise to policy C16 were rejected by more than two to one by Dacorum respondents. The Councils refusal to acknowledge this is counter to the principles of the Localism Bill. To suggest building 2 and 3 storey houses further down the slope of	Remove any references to local allocations LA1 and LA2. This will eliminate conflicts between individual strategies and the conflict with PPG2. It will also recognise the result of the first round of public consultation and thus be consistent with the principles of the Localism Bill.	No, I do not wish to participate at the oral examination	

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													Marchmont Fields is inconsistent with all of these policies. It is also not consistent with National Policy as set out in PPG2. There is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 para 3.14. Furthermore, para 3.15 of PPG2 states that the visual amenities of the Green Belt should not be injured by proposals for development within or conspicuous from the Green Belt which although they would not prejudice the purposes of land in Green Belts, might be visually detrimental by reason of their siting, materials of design.			
633323	Mr & Mrs Michael & Valerie Tate					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No	c) Consistent with national policy	The draft is not sound because it conflicts with other elements: CS1: states no damage should be done to existing Green Belt. CS4: says there should be separation between the New Town and areas on periphery. CS10: states any development should protect and enhance views in and out of town. CS11: states any development should respect the spaces between existing houses and buildings.	To think of building 2 and 3 storey houses on Marchmont Fields will destroy the views which will not be consistent with the policies laid down to protect the area.	No, I do not wish to participate at the oral examination	
633310	Ms Ruth Gilbert					Local Allocation 1: Marchmont Farm	LA1	Table LA1	Objecting	Yes	No		The draft conflicts with elements CS1 and CS4.	Remove reference to Local Allocations LA1 and LA2. This will remove conflict between individual strategies and recognise result of first round public consultation.	No, I do not wish to participate at the oral examination	
609834	Mrs Karen Smith					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	There is a legal requirement to consult with the public prior to developing green belt. Neighbours of Cherry Bounce field were NOT consulted. One neighbour found out and told others. When the Council was challenged they said it was too	The proposed development of Cherry Bounce field must be removed from the Core Strategy and the correct consultation procedures followed before it could be considered for development in the future.	No, I do not wish to participate at the oral examination	

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													expensive to consult and details were in the Dacorum Digest and local paper - neither publication was delivered to Lavender walk at the time. And also Facebook/Twitter - which are not used by me or other neighbours. Representatives of neighbours of Cherry Bounce field (including me) attended the council meeting on 26.7.11 to put forward concerns but it was obvious that the decision had already been made to build on the land and our objections were swept under the carpet. Many of us believe there was a deliberate attempt to avoid consulting with us since the council knew we would strongly object and they wanted it pushed through quietly.			
610834	Mr Norman Thomas Jones					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	a) Justified	Paragraph 20.6 quotes new housing at the Old Town, this is noted in table LA2 at the End of Section 20. The Area of LA2 is currently defined as an Amenity Green and is described as such in the Open Space Study of March 2008. It is included in Appendix 2 of the Open Space Study in the list of Amenity Greens under the name 'Cherry Bounce with location 'The Bounce' and a size of 2.795 hectares. The site also appears in Appendix 11 under Regional, Borough Local Parks. (the description Amenity Green is appropriate as the area is mowed and a seat is provided, it is not rough ground awaiting development). Putting this forward as a development site directly contradicts Point 4 under paragraph 20.5 which gives as a policy regarding Green Spaces 'to extend the network and use of green space'. Paragraph 1.11 expresses a similar policy for the Borough as a whole. (I am strongly	The planned allocation at the Old Town (LA2) should not be included so reference should be excluded from the paragraph. (At the very least a point should be included that Amenity Greens should only be included in extremis, and that any site should be developed for housing only after other options (like developer proposed sites LA1 and LA3) have been exhausted.	No, I do not wish to participate at the oral examination	

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													in support of the Policy on green spaces especially regarding Amenity Green given in 20.5 and 1.11 so would expect it to be adhered to, especially in the core strategy).			
211072	Ms Katherine Fletcher	English Heritage				Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No		<p>We have concerns regarding the proposed allocation of housing in the Old Town, as we set out in our previous response. While we recognise that this is not a site allocation plan, it does seek to establish the principle of development in this location. The interface between the old town and the countryside is highly sensitive and we suggest that this site should not be allocated through the core strategy as a strategic site. The principle of this allocation could be more appropriately considered in the Site Allocations Plan. We would be pleased to discuss this with you further.</p> <p>Page 178 Old Town housing - The comments relating to paragraph 20.6 above apply here. We would like to consider this site within the context of a detailed assessment within the Site Allocations Plan rather than as a strategic site allocation. This is a highly sensitive location adjoining the Old Town conservation Area.</p>			
211326	Mr Geoffrey Ingleby					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	a) Justified	<p>1. It is the unnecessary use of Green Belt land in a beautiful area of the old town when there are other brownfield areas in the locality.</p> <p>2. In 1987 when I bought the property the land was designated Green Belt where there would be no building. Further in 2004 the Council agreed not to build on this land.</p>	The Core Strategy is not sound because the area has been designated Green Belt and therefore should be retained for local use as it is today.	No, I do not wish to participate at the oral examination	

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													<p>Why the change in policy?</p> <p>3. I am not aware of any consultation with either local businesses or residents prior to this decision being made.</p> <p>4. This Green Belt has been widely used for recreation in all the 24 years I have been a resident here and also throughout all seasons.</p> <p>5. To build on this land I feel would considerably overload the current structure of the old town and increase the local traffic.</p> <p>6. Furthermore the Council appears to have not taken into account the history of the area and continued the neglect of this original centre of our town.</p>			
211544	Mr Jake Quintin Leith					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>Unsound because it is not Justified, Effective or Consistent with national policy.</p> <p>The land is used for recreational purposes by people of all ages. It was agreed at a meeting in 2007 of Council members that this land was an asset as open space and not suitable either then or later for building.</p> <p>There was no consultation of either local residents or businesses.</p>	Renounce Cherry Bounce land from LA2.	Yes, I wish to participate at the oral examination	I consider certain places of land to be sacrosanct - not to be built on in any circumstances.
484774	Dr Stanley Hartland					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	c) Consistent with national policy	<p>The draft is unsound because it is in conflict with elements of other strategies within it, e.g:</p> <p>CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting the Green Belt.</p>	Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflict between individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of the Localism Bill.	No, I do not wish to participate at the oral examination	

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													<p>CS4, which requires maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulbourne valleys which provide a strong landscape setting for the town.</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views into and out of towns and villages.</p> <p>CS11, which requires that development should respect the typical density intended in an area to enhance the spaces between buildings and general character.</p> <p>The Summary of Responses from the Public Consultation on the Emerging Core Strategy' (June-August 2009), which forms a part of the pre-submission draft, fails to make clear that the housing targets which gave rise to Policy CS16 were rejected by more than two to one by Dacorum respondents. The Council's refusal to acknowledge this is counter to the principles of the Localism Bill.</p> <p>To suggest building 2 and 3 storey houses further down the slope of Marchmont Fields, is inconsistent with all of the these policies. It is not consistent with national policy, as set out in PPG2: there is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 para 3.14: Planning Obligations may be used to offset the loss of impact on any amenity present on a site prior to</p>			

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													development (see DoE Circular 16/11)'. Further, para 3.15 of PPG2 states that the visual amenities of the Green Belt should not be impaired by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design.'			
498429	Steve Baker	CPRE - The Hertfordshire Society				Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Consistent with national policy. The three Local Allocations are unnecessary and unjustified. All three are located within the Green Belt and their removal from the Green Belt would not only conflict with Green Belt policy but also Policy CS1, para 8.24 and policy CS10. Significant additional brownfield site capacity exists in the town and the total housing requirement should be based on the target of 9,835 included as Option 1 in the Draft Core Strategy and supported by CPRE Hertfordshire in respect of para 14.9.	Revised total housing number for the town to be revised and changed in the text, and the local allocations removed from the text and the Figures.	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.
611218	Mr Peter Knight					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	I feel that I should have been personally notified at this address about the proposed development at Cherry Bounce (LA2) as my house and garden border this site. I have lived at 37, The Bounce and paid council tax at this residence for 22 years so there should have been no difficulty for the planning department to so notify me directly. (I understand that the planning department did undertake a substantial and expensive "scattergun" approach of advertising the proposed development via the press and numerous other means,	Remove Cherry Bounce (LA2) from the Core Strategy.	No, I do not wish to participate at the oral examination	

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													none of which I received. In fact, I was informed like many other residents by "word of mouth").			
619474	Miss Brenda Mariner					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>Unsound because core strategy is not justified and effective.</p> <p>1. There has been no notification of this plan. We were told this land would never be built on.</p> <p>2. No prior consultation with residents and local business has taken place.</p> <p>3. This field is used extensively all year round for recreational purposes and has always been regarded as part of the adjacent park land. To destroy this field would adversely affect the quality of life of residents across the town.</p> <p>4. This is Green Belt land and a vital part of the attraction of the Historic Old Town. Scenic views of this beautiful area would be lost forever if this field was built on.</p> <p>5. The Old Town area already has traffic flow problems at certain times due to narrow roads round historic buildings, so building more houses would greatly increase this and cause problems in surrounding roads.</p> <p>6. The Old Town is a beautiful area, full of old houses with historic connections. The High Street and its surrounding views are a popular location for filming. For these reasons we should be preserving our heritage for generations and not allowing it to be destroyed.</p>	Removal of the Cherry Bounce/Fletcher Way field from the Core Strategy, utilise Brown Field sites already available within the area.	No, I do not wish to participate at the oral examination	

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620274	Mrs Maureen Goulbourne					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Consistent with national policy. We have not been informed about any of the plans to build anywhere in the area off Cherry Bounce.	You need to remove LA2 Cherry Bounce fields of 80 houses from the Core Strategy to make this legally sound.	Yes, I wish to participate at the oral examination	So that I can make my views known publically.
620287	Mrs Ellen Warwick					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	We were not informed about this.	Remove Cherry Bounce from the Core Strategy.	No, I do not wish to participate at the oral examination	
620330	Mr William Trew					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	a) Justified	Not notified by Dacorum Borough Council at all.	With regard LA2 - 80 houses on Cherry Bounce needs to be removed from Core Strategy to make it sound.	No, I do not wish to participate at the oral examination	
620333	Miss Ling Au					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	I lived here for almost 18 years and I have not been informed by the Council on any plan whatsoever of your intention to build 80 houses on the field adjacent to my house.	To remove the section of 80 houses on Cherry Bounce from the Core Strategy.	Yes, I wish to participate at the oral examination	Because it affects me so very much.
334422	Ms Penny Gore					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	c) Consistent with national policy	The Draft is at odds with other parts of the stated plan. CS1. No damage should be caused to the character of the settlement/adjoining countryside, and it should be compatible with Green Belt protection policies. CS4. Maintenance of physical separation between the new town and hamlets/villages on its fringes; protection of the views and setting within the Bulbourne and Gade Valleys. CS10. Development should respect defined borders of countryside and landscape setting around the town/village; views around, into and out of towns/villages should be	Remove any reference to Local Allocations LA1 and LA2. Removing these will eliminate the conflicts between other strategies as well as removing any conflict with PPG2. The removal of the references stated above will also ensure that the results of the public consultation have been recognised and are therefore compliant with the ethos of the Localism Bill.	No, I do not wish to participate at the oral examination	

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												<p>protected.</p> <p>CS11. Building density typical in an area should be respected so as to enhance the overall character and spaces separating buildings.</p> <p>It is also important to emphasise that the consultation process on the emerging Core Strategy - according to the summary of responses - produced a clear rejection of policies proposed in the initial document.</p> <p>A point of particular concern to me, as a resident of Marchmont Farm, on the outer edge of Piccotts End, is the proposal to build 2 and 3 storey dwellings on the proposed site. This would create a looming profile which would be clearly visible from Piccotts End - and be totally out of keeping with the low-rise roofs of Marlborough Rise, which were specifically kept to a low level to protect the views across the Gade Valley. The proposal to build to 2 and 3 storey levels is not consistent with these policies.</p> <p>Further CS16 is not consistent with national policy, as set out in PPG2. There is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 paragraph 3:14.</p>				
334456	Mr Martin Cotton					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	c) Consistent with national policy	<p>There is conflict within the draft, which makes it unsound:</p> <p>CS1 - requires no damage be caused to the existing character of the settlement on adjoining countryside, and also requires compatibility with policies protecting the Green Belt.</p> <p>CS4 - requires the New Town's</p>	Remove any and all references to Local Allocations LA1 and LA2. This will eliminate the conflicts between individual strategies, and the conflict with PPG2. It will also recognise the result of the first round of public consultation and so be consistent with the principles of the Localism Bill.	No, I do not wish to participate at the oral examination	

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													separation, physically from a number of small villages and Hamlets on its edges, and the protection of the Gade and Bulbourne valleys, which provides a strong landscape setting for the town.			
490202	Miss Catherine Reece					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>It is unsound because it is not legally compliant or sound.</p> <p>Building on greenbelt land is unjustified when there are more than enough brownfield sites.</p> <p>The history of the Old Town would be eroded. In 2007 the Council said it was against the East of England regional policy, stated that they would whole heartedly oppose any build on Cherry Bounce field. Why the 'u' turn?</p> <p>Traffic will be unbearable and with the closure of the hospital where will everyone go?</p> <p>In particular the local bat population will suffer if LA2 goes ahead.</p>	<p>The strategy would be sound if the council remove green belt as local allocations. They should only use brownfield sites. I also believe that DBC should be allowed to include windfall sites, such as that at Grove Hill which we know from Cllr Holmes is a major area for future regeneration and development.</p> <p>Area LA2 in particular is not simply an ex-farmer field - it is a recreational space used and enjoyed by the local community.</p>	Yes, I wish to participate at the oral examination	I am keen to make my points heard and if that means speaking as part of the examination I am prepared to do so.
490919	Mr Thomas Godfrey					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>It is unsound because it is not justified or effective.</p> <p>You do not need to touch Green Belt. There are plenty of brownfield sites.</p> <p>You are not expanding Hemel properly and by building on our greenbelt you not only erode our natural environment and strip us of a recreational space - there is not enough infrastructure to support it.</p>	Remove LA2 from the local allocation.	Yes, I wish to participate at the oral examination	
620119	Mr Roger					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	c) Consistent with	The draft is unsound because it is in conflict with elements of other	Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflict between	No, I do not wish to participate	

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	Crump											national policy	<p>strategies within it, e.g:</p> <p>CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting the Green Belt.</p> <p>CS4, which requires maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulbourne valleys which provide a strong landscape setting for the town.</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views into and out of towns and villages.</p> <p>CS11, which requires that development should respect the typical density intended in an area to enhance the spaces between buildings and general character.</p> <p>The Summary of Responses from the Public Consultation on the Emerging Core Strategy' (June-August 2009), which forms a part of the pre-submission draft, fails to make clear that the housing targets which gave rise to Policy CS16 were rejected by more than two to one by Dacorum respondents. The Council's refusal to acknowledge this is counter to the principles of the Localism Bill.</p> <p>To suggest building 2 and 3 storey houses further down the slope of Marchmont Fields, is inconsistent</p>	individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of the Localism Bill.	at the oral examination	

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													with all of the these policies. It is not consistent with national policy, as set out in PPG2: there is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 para 3.14: 'Planning Obligations may be used to offset the loss of impact on any amenity present on a site prior to development (see DoE Circular 16/11)'. Further, para 3.15 of PPG2 states that the visual amenities of the Green Belt should not be impaired by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design.'			
620166	Mrs Jane Wainwright					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Effective. The proposed building of 80 new homes at site location ref LA2 will not conserve and enhance natural and historic landscape. Policy CS25 The Old Town is a historical gem, the character of which would be over shadowed and devalued by the crowding in of new houses built on LA2. There would be an increase in traffic adding to environmental problems. Also the quality of life for existing residents and the condition of the landscape would be seriously devalued. LA2 is unsound because because the development would create a significant impact on the character and appearance of the Gade Valley and the Old Town. Openness, local distinctiveness and the physical separation of settlements would be severely compromised and not protected as stated in policy CS5.	We feel that the proposals to build approximately 80 new homes at local reference LA2 should be removed from the strategy. This would then make the Core Strategy sound as it would be more in agreement with policies set out in the document.	No, I do not wish to participate at the oral examination	

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620247	Ms Sandra Gibson					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>The proposed building of 80 new homes at site locations: Old Town Location ref: LA2 is unsound. I do not believe the impact on the local road network could be mitigated. As a resident of the Old Town I already suffer from the traffic congestion, noise, fumes all of which will be increased with the increase in people and vehicles accessing the proposed new homes. Nor do I believe the proposals to be compliant with policy CS5 and CS25 of the Core Strategy.</p> <p>LA2 will not conserve and enhance Dacorum's natural and historic landscape (CS25). The open space and parkland create an aesthetically pleasing entrance to the old town which would be spoilt by the proposed development. The proposed building land is part of an historic landscape which should be preserved.</p> <p>The development would create a negative impact on the character and appearance of the open space forming the entrance to the old town (CS5(i)). The development would be inappropriate and would not protect the openness and the local distinctiveness and the present separation from Highfield.</p>	<p>The Core Strategy should be changed by removing the planned proposal to build 80 new homes at Location ref. LA2 in the old town.</p> <p>This would then make the Core Strategy sound and compliant with Policy CS 5 and CS25.</p>	No, I do not wish to participate at the oral examination	
620269	Mrs Jennifer Nathan					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	Yes	No	c) Consistent with national policy	<p>The draft is unsound because it is in conflict with elements of other strategies within it, e.g:</p> <p>CS1, which required no damage to be caused to the existing character of the settlement or the adjoining countryside, and required compatibility with policies protecting</p>	<p>Remove any references to Local Allocations LA1 and LA2. This will eliminate the conflict between individual strategies and the conflict with PPG2. It will also recognise the result of the first round public consultation and thus be consistent with the principles of the Localism Bill.</p>	No, I do not wish to participate at the oral examination	

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													<p>the Green Belt.</p> <p>CS4, which requires maintenance of the New Town's physical separation from a number of small villages and hamlets on its periphery, and the protection of the Gade and Bulbourne valleys which provide a strong landscape setting for the town.</p> <p>CS10, which requires that development should respect defined countryside borders and the landscape character surrounding the town or village, and that it should protect and enhance significant views into and out of towns and villages.</p> <p>CS11, which requires that development should respect the typical density intended in an area to enhance the spaces between buildings and general character.</p> <p>The Summary of Responses from the Public Consultation on the Emerging Core Strategy' (June-August 2009), which forms a part of the pre-submission draft, fails to make clear that the housing targets which gave rise to Policy CS16 were rejected by more than two to one by Dacorum respondents. The Council's refusal to acknowledge this is counter to the principles of the Localism Bill.</p> <p>To suggest building 2 and 3 storey houses further down the slope of Marchmont Fields, is inconsistent with all of the these policies. It is not consistent with national policy, as set out in PPG2: there is no suggestion that the proposed loss of Green Belt land would be somehow compensated as in PPG2 para 3.14: Planning Obligations may be used</p>			

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													to offset the loss of impact on any amenity present on a site prior to development (see DoE Circular 16/11)'. Further, para 3.15 of PPG2 states that the visual amenities of the Green Belt should not be impaired by proposals for development within or conspicuous from the Green Belt which, although they would not prejudice the purposes of including land in Green Belts, might be visually detrimental by reason of their siting, materials or design.'			
620282	Mr Paul Sheehy					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>The Core Strategy is not legally compliant as the process of community involvement was not in accordance with the LPA's Statement as local residents have not been correctly informed or consulted on the proposals. The proposals for Cherry Bounce are not sound, they are unjust. There has been no participation of the local community and no public consultation with residents directly affected in the Cherry Bounce area.</p> <p>The Core Strategy does not provide the most appropriate strategy when considered against reasonable alternatives, for example Brown field sites. Local, strategic, regional and national planning policies are being ignored as Greenbelt land should only be considered in exceptional circumstances and only when all brown field sites have been used up.</p> <p>Inconsistent with national policy. National planning framework proposals due to be introduced in the new year aimed at retaining local spaces for recreation purposes are directly opposed to the unsound proposals for Cherry Bounce.</p> <p>The Core Strategy does not</p>	<p>Incentives and pressures from central government to encourage local government developments to stimulate the housing market should not be used as 'carte blanche' to build on Green belt land that is a valued provision to the local community, ignoring all local feeling. This includes a petition signed by over 300 residents. Unrestrained development would have dire consequences for generations to come.</p> <p>Greenbelt land designated for open space and preventing urban sprawl should not be considered for development when there are more appropriate sites left unused and unconsidered.</p> <p>Brown field sites have not been adequately considered, even though they may be more suitable. As Brownfield sites are more costly to develop, they are overlooked in favour of 'cheaper' Green belt land. It would seem Cherry Bounce is being targeted as 'preferred choice' due to cheaper development cost as there is usually little or no clearing or clean up expense involved</p>	Yes, I wish to participate at the oral examination	As there has been a complete lack of consultation from my point of view until this last stage in the process.

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													<p>adequately show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved with Cherry Bounce Green belt land. The development would unjustly remove a valuable provision of community open space that has been used for a considerable length of time, (in excess of thirty five years) as a common by dog walkers, joggers, children, families and individuals for recreational pastimes.</p> <p>Ineffective and unsound infrastructure delivery planning. Local services, infrastructure and road networks are already insufficient. Infrastructure and services, already stretched, would be placed under further pressure. These would include local schools, nurseries, doctors, dentists, hospitals and utilities i.e. water and sewage pipes cracking or water pressure being lowered from increased demand.</p> <p>Unlawful. The Human Rights Act 1998 gives legal effect in the UK to the fundamental rights and freedoms contained in the European Convention on Human Rights. These rights not only impact matters of life and death, they also affect the rights in everyday life and other similar basic entitlements. The proposals for Cherry Bounce would have detrimental effect on me and my family's quality of life and also that of neighbouring residents and the wider local community.</p> <p>Human rights include:</p> <p style="padding-left: 40px;">the right to respect for private and family life the right to peaceful</p>	<p>compared to Brown field sites.</p> <p>Sites including wasteland, derelict areas, industrial sites, undeveloped commercial land and un-occupied offices and dilapidated areas i.e. Buncefield should be used up ahead of Green belt land like Cherry Bounce, land that is valued by the local community.</p> <p>'Green Infrastructure' that sits within the urban and rural landscape should be protected. A network of protected sites, nature reserves, habitats, green spaces, waterways and green linkages. It brings a range of benefits: acting as natural 'air conditioning,' assisting with pollution control and flood management, improving the health and well-being of residents by providing space for leisure activities, reinforcing the character and identity of places, as well as having a positive impact upon social interaction and property prices.</p> <p>Councils are required to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area and this should be the prime consideration in determining a consent application.</p> <p>In the case of conservation areas, control should clearly be taken of the part played in the architectural or historic interest of the area by the Land for which development is proposed, and in particular of the wider effects of the proposals on its surroundings and on the conservation area as a whole. The presumption therefore should be in favour of retaining Greenbelt</p>		

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													<p>enjoyment of your property</p> <p>The above rights would be impacted by;</p> <p>homes and gardens being overlooked loss of privacy, relative tranquillity and quietness significant increase in noise pollution increase in disturbance increase in traffic congestion loss of light from overshadowing loss on visual amenity loss of trees and parkland loss of open space for recreation</p> <p>Unjust. The residential amenities of existing and future occupiers of neighbouring properties will be adversely affected by noise, disturbance, loss of light and privacy, should the proposed development go ahead.</p> <p>Unsound. The proposed development of Cherry Bounce Greenbelt land could cause flooding, subsidence and is at present a run-off area for the properties on higher ground, including The Bounce and Townsend.</p> <p>Unjust. Cherry Bounce, the Old Town and the wider community would be exposed to 'Planning Blight'. On-going planning proposals and objections causing sufficient uncertainty for residents to abandon the area. A case in point is Sipson, near Heathrow, where the on-going threat of a third runway by B.A.A, is causing huge damage to the local</p>	<p>land which makes a positive contribution to the character or appearance of a conservation area.</p> <p>Size, bulk, height, mass, siting, design, materials, landscaping, appearance in street scene, impact on trees, adequacy of access and car parking, traffic implications and impact on neighbours are all factors that don't seem to have been given the necessary consideration.</p> <p>The proposed Cherry Bounce development would alter the current landscape slope lines and gradients of Greenbelt land and should be protected from development that would have a negative impact upon its skyline.</p> <p>Designation as a conservation area provides the opportunity to preserve or enhance an area of architectural or historic interest by controlling building design, scale and proportions of new developments, as well as the type and colour of materials used.</p> <p>In considering any application affecting a conservation area, the Planning (Listed Buildings and Conservation Areas Act) 1990 imposes a general duty upon planning decision makers to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.</p> <p>Policy 120 of the Dacorum Borough Local Plan 1991-2011 interprets this advice in a local context and provides the more detailed basis for control of development within the Borough.</p>		

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													<p>community, its economy, its habitats, its residents and its heritage.</p> <p>Unsound. Revenue generation would seem to be the main driver for local government as owners of Cherry Bounce Green belt land. For decades England's planning system has protected much-loved places from harmful development and steered development to the places where it's needed. Proposed reforms turn this on its head, using the planning system as a tool to promote economic growth ahead of social benefit and everything else.</p> <p>Not legally compliant. The character of the Historic Old Town would be compromised by the proposed development at Cherry Bounce and is directly opposed to the preservation of the Old Town as an area of Historical interest and importance. The Old Town high street is one of the borough's conservation areas with buildings dating back to the 16th century. The majority of Dacorum is within The Chilterns Area of Outstanding Natural Beauty (AONB) and should be protected from development not carpeted in concrete. The high street is referred to as 'The prettiest street in Hertfordshire' and would be spoiled by the increase in traffic and new build housing. www.dacorum.gov.uk/default.aspx?page=3060</p> <p>Unsound. I and local residents have concerns over the new build design, appearance and materials that may spoil the character of the Old Town and may not be in keeping with the current look and feel of the area, as required by Policy 120 of the Dacorum Borough Local Plan 1991-</p>	<p>Conservation area policy is applied to development proposals in addition to the criteria listed in other policies of the Local Plan, for example the land use considerations in Policy 9 and the general quality of design in Policy 11. Policy 120 is intended to achieve a higher standard and quality of development than elsewhere and therefore should not be used for affordable housing.</p> <p>In addition, conservation area policy can also be applied equally to sites outside of a Conservation area but that would affect its character and setting. Under Policy 120 a number of criteria need to be met for a proposal to be acceptable from a conservation aspect.</p> <p>Respect established building lines, layouts and patterns</p> <p>Use materials and adopt design details which are traditional to the area</p> <p>Be of a scale and proportion which is sympathetic in scale, form, height and overall character to the surrounding area</p> <p>In the case of alterations and extensions, be complementary and sympathetic to the parent building</p> <p>Conform to any design guides for conservation areas prepared by the Council</p> <p>Development proposals should adhere to the guidelines,</p>		

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													<p>2011.</p> <p>Unsound. Cherry Bounce may still contain many elements of surviving past landscapes of prehistoric Roman, medieval and post-medieval date. There is significant evidence Cherry Bounce may be of archaeological importance. Roman villas have been excavated at Boxmoor, and in Gadebridge, where remains of a large villa were found. St. Mary's church was begun in about 1140, situated on the Old Town High Street, is regarded as one of the most complete Norman churches in Hertfordshire. When repairs were being made to some cottages in Piccotts End, Medieval wall paintings of unusual quality were discovered behind several layers of wallpaper dating back to the late 15th century.</p> <p>Unsound. Many residents have concerns over pedestrian safety and congestion resulting from increased traffic in the area. Additional traffic would generate further congestion to already busy road networks in and around Hemel Hempstead. There are already significant rush hour queues on the A41 to the M25 and along Breakspear Way to the M1.</p> <p>Unsound. The adequacy of parking and the knock on affect to the Old Town high street of through traffic, delivery and heavy goods vehicles loading and unloading. The already busy side roads congested with parked cars poses a risk to residents with emergency vehicle access being further restricted.</p> <p>Unjust. Wildlife, including nesting bats protected by domestic and international law, badgers, several</p>	<p>the landscape as appropriate. This action would support the prudent management of land and benefit ecology.</p> <p>The Wildlife & Countryside Act 1981 is one of the most important pieces of Wildlife legislation in this country. It states it is an offence to:</p> <ul style="list-style-type: none"> Intentionally kill, injure or take any wild bird Intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built Intentionally take or destroy an egg of any wild bird <p>The Wildlife & Countryside Act 1981 has several subsequent amendments the most important being The Countryside and Rights of Way Act 2000 (CROW) which under Schedule 12 of the Act strengthens the legal protection for threatened species. It also makes certain offences 'arrestable' and importantly and significantly creates a new offence of reckless disturbance.</p> <p>The vast majority of residents have been completely unaware of these plans until very late in the 'consultation' period, only recently receiving a letter requesting comments (end Oct). The current guidelines for publication of proposed development plans are clearly unsound and in need of urgent review. The proposals appear to be more in keeping with development by stealth than any form of sound and legally compliant consultation!</p>		

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													<p>species of bird and squirrels all found on Cherry Bounce, would be a substantial loss to the local community should the development go ahead, as would the loss of established mature trees.</p> <p>Unjust. The requirement for housing is in question as the claimed 'demand' does not correlate with the number of empty homes in the area. There are already large numbers of properties for sale in Hemel Hempstead, e.g. the Kodak building, which have been empty for long periods. With over a million unoccupied properties nationally.</p> <p>Please could you explain why the planning considerations do not include the de-valuation to property through loss of view, character and setting, and loss of recreational use of open space? These are all major issues for local residents who would be directly affected by the development proposals for Cherry Bounce.</p> <p>Please could you also explain why a councillor has said that the Planning Inspector has requested Cherry Bounce Greenbelt land be included for development consideration. I wasn't aware it was within the remit of the Inspector to make such a request. I was under the impression it is for the Inspector to make a ruling as to whether a proposed development was sound or otherwise, not to make suggestions as to which land should or shouldn't be included for development.</p> <p>Any sensitivity analysis conducted on Cherry Bounce must have been done without the involvement of local residents that value and have enjoyed the area for many years.</p>			

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620304	Mrs Jessie Dedman					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	Not notified.	We were not properly notified, it shouldn't be allowed. Remove LA2 Cherry Bounce from the Core Strategy altogether.	No, I do not wish to participate at the oral examination	
620306	Mrs Rosina Read					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	You failed to give us notification and the first I know of the proposed works was when a neighbour informed me of the fields at the front of my property being used to build 80 houses.	The only way you can make it compliant and sound is to remove LA2 from the Core Strategy.		
620331	Mr & Mrs Weston					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	Because they did not let us know, we were not informed.	The only thing you can do is to remove the houses on Cherry Bounce from the Strategy.		
620334	Mrs Pamela Knight					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	We were not informed at all by the Council.	Remove the 80 planned for Cherry Bounce (LA2) from the Core Strategy.	No, I do not wish to participate at the oral examination	
620335	Mrs Jeanette Foster					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	We have had no communication from the Council whatsoever regarding building plans.	I think you need to remove the 80 houses on Cherry Bounce from the Core Strategy.		
620336	Ms Jennifer Hampstead					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	We were not notified in writing at any time of your intention to build on this land.	Cherry Bounce Field should be removed from the Core Strategy.	No, I do not wish to participate at the oral examination	
620338	Ms Maureen Edes					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	I was not informed about the houses being built on the Green at the back of the Sunmead Road.	LA2 Cherry Bounce Field should be taken out of the Core Strategy.	No, I do not wish to participate at the oral examination	
620339	Mrs Deborah Archer					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	I feel that as a resident of the past two years I have not received any information about the plans to build on the land.	Remove the 80 houses from new plans for Cherry Bounce (LA2).		
6203	Miss					Local Allocation	LA2	Table	Objecting	No	No	a)	Because we weren't informed.	LA2 Cherry Bounce 80 houses.		

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40	Kellie Langley					2: The Old Town		LA2	g			Justified		This should be removed from the Core Strategy.		
620341	Miss Emma Chandler					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	I believe the Core Strategy is not legally compliant due to the lack of notification to all affected parties - i.e. those who live near to or on the boundary of Cherry Bounce fields. This has presented what I see as a form of underhand tactic, which is also unsound.	The only change that I consider to be necessary to make the Core Strategy legally compliant or sound, is the total removal of any reference to LA2, Cherry Bounce proposal.		
620342	Miss Lauren Brewster					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	It is unsound because it is not Justified or compliant with national policy. We were not properly notified by the Council.	The only way would be to remove the plan for 80 houses on Cherry Bounce.	No, I do not wish to participate at the oral examination	
620343	Mr Michael Long					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	We were not informed of these plans by the Council.	Is to remove 80 houses on Cherry Bounce.		
620344	Mr Richard Fenel					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	We were not notified in advance of any of this.	Remove the 80 houses from Cherry Bounce from the Core Strategy.	No, I do not wish to participate at the oral examination	
620494	Mrs Jeanette Corfield					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	We received no notification whatsoever from the Council re. proposed building of 80 houses on Cherry Bounce fields. This is common recreational land and has always been so.	The plans to build 80 houses on Cherry Bounce should be removed completely from the Core Strategy so it is legally compliant.	Yes, I wish to participate at the oral examination	Well it seems the only way we are likely to know what is going on.
626507	Mrs Colleen Lamborn					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	It is unsound because it is not Justified or Effective. The neglect of the 'old town's' history and uniqueness is once again evident by the Councils decision to ignore its previous promise, hence to build on the green belt area.		No, I do not wish to participate at the oral examination	

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													<p>The traffic situation, bad as it is, will be impossible.</p> <p>Consultation with residents and businesses alike seem to have been completely avoided.</p> <p>The old town suffers badly by Council decisions and will be totally lost to the building so close to horrid little boxes, other towns would seem to enhance and cherish their historical places, but not Hemel Council so it seems.</p>			
626508	M & Mrs Frederick & Jill Nesbitt					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified or Effective.</p> <p>We feel the Core Strategy is unsound because:</p> <ol style="list-style-type: none"> Using Green Belt land in such picturesque area so close to the Old Town is unnecessary when there are considerable Brownfield areas available in local surroundings which would not intrude into the historical nature of the Old Town. It was agreed by the Council in 2004 "that they would never build on this piece of land" so this amounts to a complete u-turn by the Council. There doesn't seem to have been any consultation involving local businesses or local residents before this decision was reached. This beautiful Green Belt area is widely used in both summer and winter by locals for dog walking and children from the local areas for recreational purposes. Building on this site will cause over loading of the current structure of the Old Town and increase the volume of traffic in an area already 		No, I do not wish to participate at the oral examination	

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													struggling to cope at certain times of the day and night. 6. Yet again the Old Town is to suffer the slow destruction of its notable history when it already suffers from notable neglect by the Council on an annual basis.			
626519	Mr Andrew Turton					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	It is unsound because it is not Justified or Effective. I feel the Core Strategy is unsound because: 1. Using Green Belt land in such picturesque area so close to the Old Town is unnecessary when there are considerable Brownfield areas available in local surroundings which would not intrude into the historical nature of the Old Town. 2. It was agreed by the Council in 2004 "that they would never build on this piece of land" so this amounts to a complete u-turn by the Council. 3. There doesn't seem to have been any consultation involving local businesses or local residents before this decision was reached. 4. This beautiful Green Belt area is widely used in both summer and winter by locals for dog walking and children from the local areas for recreational purposes. 5. Building on this site will cause over loading of the current structure of the Old Town and increase the volume of traffic in an area already struggling to cope at certain times of the day and night. 6. Yet again the Old Town is to suffer the slow destruction of its notable history when it already		No, I do not wish to participate at the oral examination	

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													suffers from notable neglect by the Council on an annual basis.			
626518	Mrs Christine Moore					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified or Effective.</p> <p>I feel the Core Strategy is unsound for the following reasons:</p> <ol style="list-style-type: none"> 1. This area is the only part of Hemel Hempstead that has a connection historically with the Old Town. 2. The area is used extensively by the local community as a recreational piece of ground. 3. All Brown sites must be used before Green Belt is considered and then only with consultations. 4. No consultation has been done through local residents. 5. This area has been dedicated as Green Belt according to a 2004 decision by Dacorum Borough Council. 			
626513	Mr Geoffrey Moore					Local Allocation 2: The Old Town	LA2	Table LA2	Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified or Effective.</p> <p>I feel the Core Strategy is unsound for the following reasons:</p> <ol style="list-style-type: none"> 1. This area is the only part of Hemel Hempstead that has a connection historically with the Old Town. 2. The area is used extensively by the local community as a recreational piece of ground. 3. All Brown sites must be used before Green Belt is considered and 	No, I do not wish to participate at the oral examination		

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													then only with consultations. 4. No consultation has been done through local residents. 5. This area has been dedicated as Green Belt according to a 2004 decision by Dacorum Borough Council.			
611329	Mr Derek Proctor					Local Allocation 3: West Hemel Hempstead	hemel place strategy	Table LA3	Supporting	Yes	Yes		La 3 West Hemel Hempstead. I support the inclusion of land at West Hemel Hempstead as a local allocation for up to 900 dwellings, shopping and local facilities including doctors surgery, school, open space and extension to the Shrubhill common green corridor. This land is low quality farmland (grade 3b) either in arable rotation or grassland of little merit. Pouchen End Lane will create a new well defined defensive edge to the proposed site. This site performs well in technical and sustainability studies. This block of land "rounds off" the existing jagged tooth of existing residential development at Chaulden. The whole of this block of land is almost instantly deliverable with all the necessary landowners & developers promoting and working together in bringing this land forward for development. With improvements to road junctions the transport infrastructure can cope with development of this level.		No, I do not wish to participate at the oral examination	

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													<p>A new neighbourhood at this location would follow the existing borough plan of neighbourhoods built with green corridors which act as green lungs.</p> <p>This land was held in reserve by the Hemel Hempstead Development Corporation to be used for future expansion when needed. This is set out in a letter dated 1949 from the Hemel Hempstead Development Corporation to my father. The existing neighbourhood of Chaulden was the last Hemel neighbourhood to be completed the area determined by the remaining housing numbers needed following the redevelopment of the older parts of the town, which was a rather unfortunate way of planning the edge of the town This must explain the rather irregular and ragged existing urban edge and is a good argument for this land to now come forward for development and finish the job properly.</p> <p>The Inspector at the Dacorum local plan examination criticised West HH in terms of visibility from the Bulbourne Valley. This was taken up by the landowners who undertook a comprehensive tree planting programme involving 1000s of trees which are now well established tree belts and clearly show what can be achieved and now combined with further planting will counter any visibility issues.</p> <p>West Hemel Hempstead is situated close to the mainline rail link to London- Birmingham rail link at Boxmoor, by improving the existing cyclelinks, public transport timetables to the station would cut car use.</p> <p>The existing mature trees and</p>			

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													<p>hedgerows would be retained, the whole of the site is not on the floodplain. The site is southfacing and would benefit from heat gain.</p> <p>This site would enable a new neighbourhood to be built in line with the original new town plan of a balance of dwellings alongside open space with local shopping and social facilities embracing the original "vision" for Hemel Hempstead.</p>			
211055	Mr Matthew Wood	Hertfordshire County Council				Local Allocation 3: West Hemel Hempstead	LA3	Table LA3	Supporting	Yes	Yes		<p>Attention is drawn to the separate landowner representation that has been made by HCC in relation to Local Allocation 3.</p> <p>The fact that it would be prudent to plan for provision of a new 2fe primary school has been acknowledged in the guiding principles enshrined in the Local Allocation. This will ensure that there is appropriate capacity to cater for the needs arising out of the development of 900 dwellings, and ensure that there is sufficient capacity in infrastructure to support further future development on the west side of Hemel Hempstead.</p> <p>The commitment to securing appropriate funding contributions from residential development on the west side of Hemel towards new education facilities is equally supported.</p> <p>The approach to the principles 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

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													the Hemel Hempstead Place Strategy and Local Allocation 3 are a manifestly positive response by the local planning authority to the representations previously made to DBC by HCC as a service provider.			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					Local Allocation 3: West Hemel Hempstead	LA3	Table LA3	Objecting	No	No	a) Justified	No development 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. Also building on the Greenbelt decreases biodiversity. Plus upto 900 houses - this "Plan" proposes too many new homes and developments. The developments need to be more evenly spread across the whole of hemel hempstead not just this area of hemel.	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	
498429	Steve Baker	CPRE - The Hertfordshire Society				Local Allocation 3: West Hemel Hempstead	LA3	Table LA3	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified or Consistent with national policy. The three Local Allocations are unnecessary and unjustified. All three are located within the Green Belt and their removal from the Green Belt would not only conflict with Green Belt policy but also	Revised total housing number for the town to be revised and changed in the text, and the local allocations removed from the text and the Figures.	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.

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													Policy CS1, para 8.24 and policy CS10. Significant additional brownfield site capacity exists in the town and the total housing requirement should be based on the target of 9,835 included as Option 1 in the Draft Core Strategy and supported by CPRE Hertfordshire in respect of para 14.9.			
611657	Messrs M&D Gardener		611650	Mr John Heginbotham	Stimpsons	Local Allocation 3: West Hemel Hempstead	LA3	Table LA3	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
211503	Mr Colin White	Chilterns Conservation Board				Local Allocation 3: West Hemel Hempstead	LA3	Table LA3	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</p>	<p>Include mention of the proximity to the Chilterns AONB and the need to ensure that the setting of the AONB is protected in the 'principles' section of the text on page 178. Amend the first part of the 'principles' section to ensure that three storey dwellings are not included on the northern part of the site close to Fields End Farm as this is the highest and most prominent part of the local allocation.</p>	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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>			

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													Local allocation 3 for Hemel Hempstead identifies an area to the west of the town for future growth. Whilst not being within the Chilterns AONB it is likely that because the development is of a significant scale (about 900 dwellings and other associated services and facilities) and will almost certainly be within about a kilometre of the AONB great care would be needed with the treatment of this site. The proximity to the Chilterns AONB and the need to ensure that the setting of the AONB is protected (and ultimately the AONB is therefore conserved and enhanced) should be specifically mentioned in the 'principles' section of the text on page 178. The Board would also be concerned about three storey dwellings on the northern part of the site close to Fields End Farm as this is the highest and most prominent part of the local allocation. The first part of the 'principles' could usefully be amended to reflect this.			
503294	Chris Shaw	Highways Agency				Local Allocation 3: West Hemel Hempstead	LA 3	Table LA3	Objecting	Yes	No		Please see hard copy for more details: M25 Junction 20 straddles the Dacorum-Three Rivers administrative border and is therefore a shared concern between both authorities. The Highways Agency notes that neither authority has identified a need for infrastructure improvements at M25 Junction 20 through their respective infrastructure evidence work. The Highways Agency is concerned that any potential impact arising from new development may be overlooked at this location and therefore it is recommended that under Local Allocations - West Hemel Hempstead (page 178) 'Principles' that the need for a Transport Assessment to consider	The Highways Agency proposes the following additional text is provided under 'Principles' for West Hemel Hempstead: "A Transport Assessment(s) is required to assess the traffic impact of proposed development(s) on the operation of M25 Junction 20. Assessment of this junction should also include the merges and diverges to the M25 mainline carriageway as well as the operation of the gyratory. Where necessary, the assessment should outline mitigation measures to ensure that if the capacity of the junction is exceeded, that the Strategic Road Network is „no worse off" than if the development did not	No, I do not wish to participate at the oral examination	

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													the traffic effects of development at M25 Junction 20, including the merges and diverges.	<i>take place, as specified in DfT Circular 02/2007."</i>		
625293		BIDWELLS				Local Allocation 3: West Hemel Hempstead	LA3	Table LA3	Objecting	No	No		With regard to -proposals and -principles, the Policy requires the provision of a new Primary School on the Site. It should be made clear and emphasised that any obligations either via a Section 106 or Community Infrastructure Levy contribution is proportionate to the development proposals, and is in order to meet its own development needs. The specifics of a new 2-form Entry Primary School may not be justified for a 900 unit scheme. There have been instances where Educational Authorities impose excessive educational burdens upon Developers, which are greater than merely required for the development itself. For instances, the requirements of a 900 unit scheme given school capacities nearby may only be for a single form entry. Education Authorities invariably dislike single form entry school, though clearly these slightly greater than a single form entry. Education Authorities may nevertheless insist on a two form entry, and this provides surplus capacity. This surplus capacity is then sometimes used to enable existing school sites to eventually close and to be sold for redevelopment. It is not a requirement for the development industry or the planning system to provide development opportunities for the Local Education Authorities. The time to establish the educational needs for development at West Hemel Hempstead will be when the Planning Application is considered. Given the timescale for the Core Strategy and development phasing, a policy criteria relating to education provision must be		Yes, I wish to participate at the oral examination	

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													<p>inherently flexible to take account of changed circumstances. The specific policy requirement for a two form entry Primary School may not be reasonable at the time the Planning Application is considered. For this reason, the text requires alteration.</p> <p>The level of Affordable Housing should be amended to –around 35%ll, this is the figure referred to in the Regional Plan, which was evidence based, but is also consistent with Policy CS19. As indicated above, the 35% Affordable Housing provision was assessed at a time when there was Grant Aid available to RSL's and the absence of such Grant Aid has a negative impact upon the economics of development.</p> <p>I would wish to participate at the Oral Examination on behalf of a possible interested Stakeholder/Landowner in respect of West Hemel Hempstead.</p>			
627624	Mrs Ailsa Davis					Local Allocation 3: West Hemel Hempstead	LA 3	Table LA3	Supporting	Yes	Yes		<p>I am writing in response to the invitation to comment on the Core Strategy pre-submission document and the meeting that was held on 17 November 2011 at Dacorum Borough Council offices with Richard Blackburn and the various landowners of the area covered by Local Allocation LA3. I am responding on behalf of Hertfordshire County Council (HCC) in its capacity as landowner of the 1.3ha site at Chaulden Lane, which forms part of the Local Allocation LA3 being promoted for housing development within the Core Strategy. A copy of a plan which shows the extent of the HCC land is attached.</p> <p>Firstly, I would like to register</p>	Yes, I wish to participate at the oral examination		

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													<p>support for the residential development of the area covered by LA3 and can confirm HCC is willing to work with Dacorum Borough Council and the other landowners to help deliver the proposal at the right time. HCC supports the description of the proposal and the development principles which underpin it as stated within the Core Strategy Pre-submission document. In particular, we would like to register support for the provision of a new 2 form entry primary school on the site to provide education provision for the child yield resulting from the new housing and to address the existing deficiency of school places within the west of Hemel Hempstead.</p> <p>A brief analysis of the site and its planning constraints is set out below:</p> <p><i>Site Description</i></p> <p>The site, measuring approximately 1.3ha in area, is located to the north of Chaulden Lane and west of the residential area of Chaulden on the western edge of Hemel Hempstead. The site currently has no vehicular access, however the cul-de-sac leading off Campion Road abuts the eastern site boundary which could potentially be continued into the site to provide vehicular access from the Chaulden residential area. The site slopes from north to south and</p>			

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													<p>is predominantly grassland. The site boundaries are lined with mature trees and hedgerow, particularly along the boundary with Chau[den Lane.</p> <p><i>Planning Constraints</i></p> <p>Under the current adopted Local Plan, the site is designated as Green Belt where appropriate land uses include agriculture, forestry and essential facilities for outdoor sport and recreation. Residential development in the Green Belt is inappropriate and harmful by definition, unless very special circumstances can be demonstrated. Other planning constraints include the Area of Outstanding Natural Beauty to the west and the Bulbourne Valley to the south. The site itself is open grassland with boundary trees/hedgerow, which should be retained where possible to screen the development from the rural area to the west and the Bulbourne Valley to the south.</p> <p><i>In terms of on site feasibility work, a transport assessment, flood risk assessment, drainage survey and ecology assessment have not been carried out to date. However, the County Council would be willing to consider commissioning this work if requested to do so by Dacorum Borough Council in order to inform development proposals for the site allocation area. The Environment Agency has</i></p> <p>confirmed the site does not fall within an area at risk of flooding.</p> <p><i>Development of Site</i></p>			

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													<p>Due to the fact the HCC part of the site is located on the southern edge of the area covered by LA3, it is considered that it is not the most sustainable location for the new 2FE primary school if it is to adequately serve the needs of the development as a whole and existing deficit within the west of Hemel Hempstead.</p> <p>Attention is drawn to paragraph 5.23 of HCC's service representations dated November 2010 where it was stated it would be helpful if the location of any such education reserve site could be identified so that it could serve the needs of both the Hemel West and the Hemel North West Primary Planning area. We would be happy to work with the other landowners and Dacorum Borough Council to identify an appropriate location.</p> <p>Chaulden Lane, which runs along the southern boundary is a narrow, rural road unsuitable for the level of vehicular and pedestrian traffic generated by a school. HCC would like to see a centrally located school site of a minimum of 2.5ha provided as part of the overall masterplan. Comments on phasing will be provided at a later stage once discussed with HCC Children's Services.</p> <p>Given the fact the residential area of Chaulden abuts the eastern site boundary, it is considered the site would be most suitably developed for residential purposes with the access from the cul-de-sac off Champion Road being continued into the site to serve the new housing. No access would be created onto Chaulden Lane, however vehicular and pedestrian permeability to the rest of the land allocation would be</p>			

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													factored into any detailed design proposals. Regard should also be had to the need to safeguard the view of the Area of Outstanding Natural Beauty to the west and mitigate the impact on the Bulbourne Valley. The importance of avoiding the appearance of coalescence with Bourne End to the south west is also acknowledged. As noted, HCC would welcome continued involvement with the development of the Local Allocation and will continue to support the promotion of Local Allocation LA3 within the Core Strategy.			
627495	Mr Nigel Agg	TAYLOR WIMPEY UK LTD	210999	Mr Martin Friend	Vincent & Gorbing	Local Allocation 3: West Hemel Hempstead	LA 3	Table LA3	Supporting	Yes	Yes		Taylor Wimpey support the Local Allocation (LA3) at West Hemel Hempstead. The proposal will allow for a new neighbourhood that can be delivered in accordance with well established national and local planning policy principles relating to Green Belt definition, sustainable development and environmental impact. As set out in Section 1 of this statement, TW are committed to working with the other landowners who have an interest in the allocation, and the Council, to bring forward a comprehensive masterplan and delivery process, through the vehicle of the Site Allocations DPD. TW consider that the allocation meets the tests of deliverability, achievability and suitability set out in PPS3 Housing. DEVELOPMENT PRINCIPLES Taylor Wimpey support the development principles set out within the Local Allocation (LA3)		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>table.</p> <p>We would make two suggestions that could be dealt with by minor amendments. Under the third bullet point, we suggest the following is added : "In addition, the development should establish a long term defensible Green Belt boundary in accordance with the advice of PPG2."</p> <p>Secondly, the requirement for affordable housing should cross reference to policy C519, which helpfully and correctly refers to viability and need as considerations in determining the exact quantum of affordable housing.</p> <p>DELIVERABILITY</p> <p>In response to the Draft Core Strategy in December 2010, representations were made in respect of the Taylor Wimpey land, conceived as an extension to the adjacent housing development at The Avenue to form a newsustainable 'Field's End' neighbourhood with an additional 600 dwellings, or 450 dwellings and a new primary School. The initial land use planning options allowed for highways links to the south of the TW site in order to facilitate further phases of development on other land should a larger development be considered necessary by the Council.</p> <p>Since that time, further technical assessment work has been undertaken of the TW part of the LA3 allocation in order to demonstrate that there are no impediments to the delivery of this land for housing, and also to provide guidance on constraints and</p>			

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													<p>opportunities that will assist more detailed masterplanning. The results of these technical assessments are set out below.</p> <p>Transportation</p> <p>Detailed analysis of the access arrangements to the TW site, based upon the proposal for 450 units and a primary school, was undertaken in June 2011 by Stomor Civil Engineering Consultants.</p> <p>The study highlights the accessibility of the site to the town's major centres of employment, primary and secondary education and local retail facilities. In addition, the development itself would incorporate educational, medical and some local retail units that would reduce the need to use private cars.</p> <p>The proposed access arrangements for the development are onto Long Chaulden and The Avenue. Bus services could be routed through the development by diverting local services.</p>			
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Local Allocation 3: West Hemel Hempstead	LA 3	Table LA3	Supporting	Yes	Yes		<p>This comment relates to the Local Allocations (Pages 177 to 179) and specifically to LA3 West Hemel Hempstead.</p> <p>Our client supports the proposed Local Allocation at West Hemel Hempstead.</p> <p>They consider it an appropriate mechanism for securing the housing requirement for the town and the wider Borough over the Core Strategy Plan Period. It is their view that the allocation will provide for a sustainable urban extension that can be comprehensively master-</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</p>

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													<p>planned to ensure that necessary local infrastructure needs are met. Its development would not significantly impact on the local environment, given the current nature value of the site, whilst its release from the Green Belt would not adversely impact on overall purpose of this designation in this locality.</p> <p>Our client supports the principles identified under Proposal LA3 in specific relation to West Hemel Hempstead as the basis for developing the site through the Site Allocations DPD, although suggests that reference should be made to establishing a long term defensible Green Belt boundary in line with guidance set out in PPG2.</p> <p>As the largest of the Local Allocations, West Hemel Hempstead is of particular importance to meeting the housing needs of Dacorum and, specifically, Hemel Hempstead. It is considered that this site should be allocated and brought forward for development at the right time in order to secure balanced growth (and an appropriate mix of housing) for Hemel Hempstead, which is the Main Centre for Development and Change within the Borough.</p> <p>Together with Taylor Wimpey, our client, Barratt North London, has secured an option to develop the Land at West Hemel Hempstead.</p> <p>To support the site's promotion, our client and their consultants have prepared and submitted a series of supporting technical documents,</p>			development issues). They would therefore welcome the opportunity to participate in all relevant discussions at the Examination in Public.

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													<p>which have demonstrated the suitability of the site. These documents cover issues such as planning policy, design and masterplanning, landscape, flooding and drainage.</p> <p>These studies have indicated that the development would be an appropriate and sustainable urban extension. They show that the site can be development for 900 units without the need for extensive new infrastructure relative to transport, drainage, etc. This view is supported by studies conducted on behalf of the Council. The Hemel Hempstead Urban Transport Model identified that — subject to some local network improvements — the total number of units can be accommodated on site.</p> <p>Further, the masterplan and landscape studies produced show that an appropriate and sensitive development form can be delivered on site that will not impact on the wider landscape and environment issues prevalent in the locality such as the effects on the Chilterns AONB.</p> <p>While it is also noted that no issue arise in respect of archaeology, flood risk, ecology and ground conditions, which would prevent the site's development.</p> <p>Through this work, our client hopes to have demonstrated their commitment to the site's development, whilst, furthermore, they would like to confirm that they are committed to working together with Taylor Wimpey, Hertfordshire County Council (who also have an interest in the site) and Dacorum Borough Council in order to secure</p>			

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													<p>the delivery of the Local Allocation at the appropriate time.</p> <p>They consider that the allocation of Land at West Hemel Hempstead will play an important role in meeting Core Strategy objectives and will ensure that there is an adequate and flexible supply of housing is provided during the plan period.</p> <p>It is understood 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>			
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd		Figure 19	Figure 19	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>			
211072	Ms Katherine Fletcher	English Heritage					Figure 19	Figure 19	Objecting	Yes	No		<p>We suggest the following amendments -</p> <ol style="list-style-type: none"> 1. Town Centre - add '...the public environment, whilst recognising and incorporating its features of architectural, historic and communal distinctiveness' 2. Neighbourhood Centres - add '...neighbourhood local 			

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													centres whilst conserving their individual architectural, historic and communal distinctiveness'.			
503032	W Lamb	W Lamb Ltd	210965	Mr David Lander	Boyer Planning		Figure 19	Figure 19	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy. Figure 19 identifies insufficient new locations for housing at Hemel Hempstead.	Shendish should be added to Figure 19 as shown on Appendix 5 of the Statement.	Yes, I wish to participate at the oral examination	Significant issue relating to housing provision spatial strategy, Hemel Hempstead Place Strategy.
211503	Mr Colin White	Chilterns Conservation Board					Figure 19	Figure 19	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 the public of the special qualities of the area of outstanding natural beauty 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). 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	Include the AONB boundary on Figures 19 and 20.	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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>Figures 19 and 20 could usefully be amended to include the AONB boundary as this is very important to</p>			

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													the setting of Hemel Hempstead.			
610088	Mr Martin Hicks	HBRC					Fig 20. Natural	Figure 20	Objecting	No	b) Effective		This map does not show Shrub Hill Common LNR, and the RIGGS boundary is incomplete - the pingo features are also found north of the road/ railway up to Fishery Road (see RIGGS layer supplied by HBRC 2011).	Add Shrub Hill Common LNR and complete RIGGS boundary.		
502874	Mr Chris Bearton	Hertfordshire County Council					Figure 20	Figure 20	Objecting	No	No		Figure 20 should be re-named natural and historic environment and should include the position of Scheduled Monuments (statutory in a similar way to SSSIs), Listed buildings and possibly areas of significant archaeological potential.			
211503	Mr Colin White	Chilterns Conservation Board					Figure 20	Figure 20	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</p>	Include the AONB boundary on Figures 19 and 20.	No, I do not wish to participate at the oral examination	

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												<p>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 8th 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>				

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													Figures 19 and 20 could usefully be amended to include the AONB boundary as this is very important to the setting of Hemel Hempstead.			
627639	Mr Douglas Archibald						Fig 20	Figure 20	Objecting	No	No	a) Justified	The Core Strategy 1991 - 2011 Open Land Policy was adopted without any consultation with affected landowners. I own the freehold to my house and garden, which is fenced, and private. Policy 116 provisions are not appropriate for this situation.	Remove houses in HP2 5PT from the open land line drawings.	No, I do not wish to participate at the oral examination	
625668	Ms Alix Mills	CBRE Global Investors					Figure 21	Figure 21	Objecting	Yes	No		In order to achieve the vision of the Core Strategy for the town centre we would urge the Council to include the area around Two Waters Way as part of the town centre. This would entail redrawing the boundary and dragging it south. Hemel Hempstead town centre needs to be more competitive and the current policy position does not assist or stimulate development at Two Waters. The area has excellent transport links and is ideally situated to strengthen the town centre by creating a 'dumb bell' area which could have two anchor store at either end of the 'dumb bell' with the main town centre as the 'bar'. This model has been successfully introduced in a number of town centre.			
211068	Mr Nick Harper	The Crown Estate	210968	Ms Helena Deaville	AMEC		Figure 22	Figure 22	Objecting	Yes	No	b) Effective	There is reference to Spencer's Park extending into St. Albans in Figure 18, and Figure 22 shows the AAP boundary within St. Albans. This boundary appears to be rather ad hoc and there does not appear to be any evidence in support of why this particular boundary has been drawn, or whether this boundary has been agreed with St. Albans. In the absence of any specific evidence it would be more appropriate to consider the M1 as the boundary to both the north and	There does not appear to be an evidence base to support the eastern boundary of the East Hemel Hempstead AAP area as shown in Figure 22 of the document. There is also no evidence to suggest that this boundary has been agreed with St. Albans. Therefore the M1, which is a significant physical boundary, to the north and south of Junction 8 would appear to be a more obvious boundary.	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 beyond. The Crown Estate has worked closely with Dacorum

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													south of the area at this stage. This provides greater flexibility for the development of the AAP.			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 very concerned that cross boundary opportunities for sustainable development are not being considered further in the Core Strategy because there has not been clear and fully cooperation between Dacorum and St. Albans regarding the growth needs of Dacorum.
629143	Mr Chris Briggs	St Albans City & District Council					Figure 22	Figure 22	Objecting	Yes	No		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. 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		No, I do not wish to participate at the oral examination	

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													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 & District Councils and we look forward to participating further in such working in the near future.			
598449	Dr Ian Rennie					Berkhamsted Place Strategy	Berkhamsted Place Strategy	21	Objecting	No	No	c) Consistent with national policy	The Strategic Environmental Assessment and Sustainability Appraisal Scoping Report identified that "pressures on water resources are increasing". Of all issues reviewed by the consultants in the report the majority of issues relate to water. Section 16 of the core strategy talks about "enhancing the natural environment" Section 16.15 refers to "enhancement of the river valleys, wetlands, and the Grand Union Canal". Currently, through a mixture of Climate Change, and recent additional developments in the area - especially in Berkhamsted, where the water source is a bore hole near the town centre, there has already been adverse effects on the local river, and Grand Union Canal to the extent that the River Bulbourne is now dry, and has been for some weeks, and because of a lack of spring water entering Wilstone reservoir there is currently restrictions on boat traffic on the canal because of lack of water. Under the Water Framework Directive there is a requirement for Member States to achieve " good ecological status" of inland water	The Core Strategy will only be legally compliant, and sound when new water sources can be brought to the area such that the local environment, in the for of the local chalk streams - in particular the River Bulbourne are not adversely affected. Continued use of the local aquifer in Berkhamsted with such a planned increase in housing can only place increased demand on this finite resource, and with climate change the possibility of the aquifer being replenished is remote. OFWAT recognises the issue of local water companies not wanting to purchase water from other areas, because of additional cost, but in the long run this will be a partial solution - water needs to come from the wet North and West to the South East. If this Core Strategy is implemented before a solution to the chronic water shortage in the area occurs - especially in Berkhamsted, the River Bulbourne, mentioned in the Domesday Book as running 2 mills, will never be seen again. It should also be added that the Sustainability report undertaken	No, I do not wish to participate at the oral examination	

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													bodies by 2015. The E.U. Biodiversity Strategy requires habitat protection and enhancement, and in Hertfordshire this is implemented via the Hertfordshire Biodiversity Action Plan. Priority habitats include "Chalk Rivers" and Reed beds. The River Bulbourne in Berkhamsted is a chalk stream, and is currently dry. Any additional housing development with increased use of water--even if houses have rainwater saving devices, will lead to a further drop in the aquifer in the surrounding Chiltern Hills, and the total disappearance of this protected chalk stream forever - this would be an illegal action. Such water habitats should be protected. Further housing development in Berkhamsted should not occur until new sources of water can be brought to the town such that the river, and the Grand Union Canal, that runs close to the River bed, can be protected such that they continue to run, and are of good quality. There is much comment on enhancing the local environment, and promoting the use of such amenities as the local rivers and the canal, the proposed Core Strategy will not do this, but will have an adverse effect. It is worth also stating that the state of the River Gade through Gade Park is also of concern with flow severely restricted, and the river bed silting up - this is another chalk stream that is also protected under legislation.	by Halcrow and C4S took place some time ago, when the River Bulbourne was running, and they did not take into account the fact that Berkhamsted is higher than Hemel Hempstead, and hence any fall in the aquifer level will have a more immediate effect there.		
211062		Banner Homes Limited	618743	Mr Les West	Barton Willmore	Berkhamsted Place Strategy	Section 21	21	Objecting	Yes	No	a) Justified	Banner Homes is most concerned about the procedures which have been followed in the preparation of the Core Strategy in relation to the site at Lockfields. Despite the Local Plan Inspector making it quite clear that he did not accept that there was any need for the	The Berkhamsted Place Strategy' does not identify a sufficient housing target for Berkhamsted. The Council included this designation on the basis of its potential contribution to the Springfield	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>consideration of the potential of this site for development having to be dependent on the delivery of the New Road/Springfield Road link road, the Council introduced the site in the Emerging Core Strategy on this basis without any justification. As a consequence the site has been removed from the draft Core Strategy because of its association with the link road, for which there was local objection and lack of support from the Highway Authority.</p> <p>Prior to the Draft Core Strategy consultation stage in November and December 2010, Hertfordshire County Council had already produced a feasibility report which considered the link road as being unviable. As the housing designation for the site was mistakenly inextricably linked to this road in this version of the Core Strategy we consider that the decision to remove the designation from the Core Strategy had already in effect been taken meaning that this consultation stage was not effective.</p> <p>Notwithstanding this, the inextricable link in the Draft Core Strategy between the housing designation and the delivery of the of the link road is not consistent with the Local Plan Inspector's Report which clearly considered that the housing designation should not be dependent to the link road.</p> <p>It is considered that the merits of the Lockfields site in terms of sustainability as well as its relative lack of importance to the purposes for the retention of the Green Belt have been overlooked by the</p>	<p>Road/New Road link which has subsequently been deemed unviable. This</p> <p>designation has now been deleted. However, the designation should not have been dependent on the link road coming forward and the Council has provided no other justification for removing the site's housing designation.</p> <p>To address this it should allocate the Lock Field site for housing allocate the Lock Field site for housing development.</p> <p>Please refer to Barton Willmore's accompanying report for further details.</p>		

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													<p>Council as a result of the unjustified association with the link road proposal.</p> <p>It is considered that the proposed deletion of the Lockfields site during the plan making process has not been properly justified'.</p> <p>Please refer to Barton Willmores accompanying report for further details.</p>			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Berkhamsted Place Strategy	Section 21	21	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA.</p> <p>The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted.</p> <p>The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p> <p>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural</p>	<p>New Paragraphs are needed:</p> <p>21.15 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>21.16 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 private car trips.</p> <p>21.17 Local employment provision is also provided to meet local employment needs as part of the development proposals.</p> <p>21.18 In order to ensure the sustainability of new development</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>household growth projections. This Chapter of the CS does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area.</p> <p>GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS Local Allocation under the Berkhamsted Chapter.</p>	<p>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>21.19 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>22.20 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.</p> <p>These development principles reflect the Core Strategy's "Challenges" and "Strategic Objectives" and "The Vision" and "Local Objectives" for Berkhamsted of the Core Strategy Plan.</p> <p>Site Reference: Proposal LA5</p> <p>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</p>		

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														<p>(identified at Appendix 1).</p> <p>Proposals: Phased delivery of around 800 dwellings as a development capacity target including affordable in accordance with Policy CS 19</p> <p>Principles: Within the area identified at Land South of Berkhamsted a sustainable, well designed mixed-use development will be delivered by 2020/21 including:</p> <ol style="list-style-type: none"> 1) Phased delivery of around 800 dwellings as a development capacity target including affordable housing in accordance with Policy CS 19; 2) Appropriate retail and leisure facilities; 3) Social and physical infrastructure (including land provision for one new primary school); 4) Improvements to transport capacity along the A41, Chesham Road and Swing Gate Lane including the provision of the East and West Avenue Link Road (connecting the aforementioned existing roads south of the town); 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, subject to viability at the time of a later planning application; 6) New and improved open space and pitch provision. 		

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														Delivery: A comprehensive planning framework is needed to link various land uses and their phasing. Development will be programmed in order to enable a capacity target of some 800 units by 2019/2020.		
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Berkhamsted Place Strategy	Berkhamsted Place Strategy	21	Supporting	Yes	Yes		The Berkhamsted Place Strategy is supported in principle, however it should be noted that individual development proposals and sites will need to be assessed in respect of their impact on the waste water network. Depending on the precise location and scale of development proposed, local network upgrades could be required.	N/A	No, I do not wish to participate at the oral examination	
503097	Mr Roger Tym	Quilichan Consultancy				Berkhamsted Place Strategy	Section 21	21	Objecting	Yes	No		1) The first phase of the development of this site is now complete. The whole site is narrow, overshadowed by the main line rail tracks and the Grand Union Canal. The first phase was not designated as being in the green Belt, but the second, the subject of this note, is. It is on the edge of the Green Belt, but isolated from the main area of Green Belt This part of the site has no other access except by way of the rear of the developments on the first phase. This, the potential second phase site, it is submitted, makes no contribution to the assets or characteristics of the Green Belt, and, if left undeveloped, would remain as a purposeless sliver of land whose environment is dominated and badly impaired by the noise and vibration of trains passing at high speeds on the			

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													<p>embankment immediately above. The release of this site from the Green Belt would not set a precedent, since its own particular deficiencies as a site are not replicated elsewhere. Its retention within the Green Belt could be said to represent the triumph of blind principle over reality and the opportunity to create more badly needed housing..</p> <p>2) A submission for the development of this second phase has already been made in August of 2009. This was at a time when the full implications for the housing market of the financial crisis of 2008 were yet to make their full mark. This site is not identified for development in the Core Strategy, but might, at some time in the future, and if the timetable set out in the Core Strategy is followed, qualify as a 'windfall' site. It is understood, however, that there is now real concern in the Borough as a whole that for the next five years at least, there is little prospect of housing targets being met with any certainty, and, more importantly, the programme for the production of affordable housing may fall substantially short of the targets.</p> <p>3) This site could, however, be brought into housing development immediately, with a full contribution of affordable units, because its development would follow on from and utilise the infrastructure of the development of the first phase. The same measures to alleviate the effects of the noise and vibration that were employed on the first phase and approved by the Council would be used here. 16 two bed flats could be accommodated on the site, with the noise from the embankment being mitigated by</p>			

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													<p>facing the development away from the rail line and the provision of sound proofing. These measures were deemed satisfactory for the first phase, and would be replicated on this site. At the present requirement of 35% of units being affordable, this would produce 6 affordable units.</p> <p>4) The site has the merit of being in the valley floor, thus encouraging the use of public transport and cycling. It does not require any additional public infrastructure before it can be developed. Development would transform the site from an unused piece of essentially back-land into an extension of the newly completed development, immediately contributing to the alleviation of a housing target that cannot be met in full.</p> <p>5) This submission, therefore, presents the choice: keep the line of the Green Belt boundary intact, despite the very serious environmental conditions found on the site, or release the land for immediate housing development. It is therefore requested that this site be earmarked for immediate, 'windfall' development, and if this proposal is deemed to have merit, a planning application would be submitted forthwith.</p>			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	Local Objectives	21.1	Objecting	Yes	No	a) Justified	<p>While BRAG supports the overall vision, it must be noted that to promote non car use ridge top developments have to be avoided.</p> <p>With regard to the local objectives BRAG considers the number of houses (1180) to be excessive to maintain population stability - see BRAG responses to paragraphs 1.13 (a) and 8.9 (Table 1).</p>	<p>Bullet point one should read:</p> <p>Provide around 750 new homes between 2006 and 2031.</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.

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610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.1	21.1	Supporting	Yes	Yes		BRAG endorses DBC's view of Berkhamsted. It is important to stress that it is a valley town of linear nature rising steeply to the ridge tops. The linear nature of the town, the steepness of the valley sides, the dense character of the settlement and the narrowness of all the roads, apart from the A4251, militates against finding space for any infill whatever. More development means more traffic, destruction of habitat, land sealed against rainwater, and yet more sewerage. As it is rainwater pours down the hills causing flash floods and it is not unknown for sewerage to overwhelm gardens in the valley. The hills are also a major deterrent to sustainable modes of transport such as walking and cycling. Although the shops would no doubt benefit from more trade, there are severe parking restrictions for any shoppers: the High Street struggles with the sheer number of cars and vans. Given that Berkhamsted does not offer much choice in employment, many people commute. However, those on rush hour trains are crammed in and there is no sign of this situation improving. Unfortunately, it is not realistic for DBC to refuse to entertain any new housing allocation in Berkhamsted in the period 2006-31: it is a matter of minimising it.		No, I do not wish to participate at the oral examination	
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Paragraph	Local Objectives	21.1	Objecting	Yes	No	b) Effective	In line with the comment made on the Strategic Objective (Section 6), Transition Town Berkhamsted (TTB) believe that the local objectives should include a specific line item relating to local food production. Opportunities to encourage local food production will arise in many forms, and so it is appropriate and vital that this objective should be expressed at the highest level. We	Please add a line item as follows: "To support local food production, distribution and consumption, in order to delivery sustainable and resilient local communities." The line item on employment should also be modified to read as follows:	No, I do not wish to participate at the oral examination	

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													believe that to be effective, this core strategy must include a strong support for this, so that support if felt throughout the planning processes. In the same vein, we believe that resilient communities will provide a high proportion of working people with jobs locally. Maintaining the current levels of employment is not sufficient to do this. Local employment must be increased with jobs that are suitable for local people.	Increase the current level of employment provision, with jobs appropriate for, and accessible to, the local population.		
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Local Objectives	21.1	Objecting	Yes	No		P 183 Section 21 BERKHAMSTED PLACE STRATEGY Para 21.2 Vision Object The allocated 1180 dwellings will place significant demands on the local roads, sewage systems, schools etc where under investment over recent decades as the number of dwellings has increased, is reflected in a declining quality of the public realm. Furthermore, referring to a Boro paper in 2009, CLG/ONS projections for household size while maintaining local population levels, the dwellings required are only approximately 750. The Borough's allocation is excessive.		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.
515465	Mr Alan Kemp	Berkhamsted Town Council				Paragraph	Local Objectives	21.1	Objecting	Yes	No	a) Justified	Berkhamsted Town Council does not support this level of growth. We contend that the proposed development for Berkhamsted will exceed 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		Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.

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													for the Core Strategy, dated April 2009, we have the following figures for Berkhamsted			
617337	Ms Yvonne Crocker	Northchurch Parish Council				Paragraph	21.1	21.1	Objecting	No	No		<p>I am sorry to be so late on Northchurch Parish Council's comments on the Core Strategy. To be honest, Northchurch Parish Council found the Core Strategy document extremely disappointing. Northchurch is not named on various maps and the 3,000 residents of this community feel sidelined by the Core Strategy.</p> <p>The main arguments in Northchurch are the inability of Dacorum Borough Council's Officers who drew up this plan to recognise that Northchurch is a separate legal community. It isn't an "add-on" to Berkhamsted and should not be treated as such. For instance, 21.14 on page 185 indicates that County Councillors had concluded that the New Road / Springfield Road link proposal aimed at relieving traffic through Northchurch would be expensive with no over-riding benefits. There is no proof of this statement. No-one has sought to detail the benefits and indeed the Borough Council has allowed, on the Tunnel Fields site, houses to be built on what may well have been the preferred route for the link road to be completed. Why?</p>		Yes, I wish to participate at the oral examination	
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	Local Objectives	21.1	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA.</p>	<p>Local Objectives</p> <p>It is recommended on the above basis that the following local objectives for the town are amended to read as follows:</p> <p>Provide around 2,871 new homes between 2006 and 2031</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

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													<p>The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted.</p> <p>The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p> <p>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural household growth projections. This Chapter of the CS</p> <p>does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area.</p> <p>GUI provides a solution to a</p>	<p>Bring forward the strategic site at Durrants Lane/ Shooterways (Egerton Rothersey School) to deliver new homes, improvements to the school and informal leisure space for the community.</p> <p>Bring forward new development to the south of the town at Land South of Berkhamsted in the form of a sustainable urban extension as described in the Allocations section of this Chapter</p> <p>Deliver new primary school provision to include a new primary school as potentially forming part of the South Berkhamsted Urban Extension</p> <p>Support the British Film Institute to consolidate their site</p> <p>Maintain the current level of employment provision.</p>		Berkhamsted.

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													currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS Local Allocation under the Berkhamsted Chapter.			
328864	Mr Danny Bonnett	Transition Town Berkhamsted					Statement Vision 4	Statement Vision 4	Supporting	Yes	Yes		I am writing here, on behalf of TTB, to support the vision statement. Whilst the selection process that has resulted in the choice of the Egerton Rothsay site as one for future housing may not be especially transparent to us, a process has been followed and this site is now earmarked for development. In line with the Objectives of the core strategy as a whole, TTB will follow this development to ensure that the principles of sustainable development are followed, and also that as far as possible, housing provided on this site will meet the needs of the local population, and not the needs of the developers. We have continuing reservations about the likelihood of this development delivering sustainable transport opportunities for residents, due to the distance from the town centre(s), and also due to lack of access to bus routes or cycle lanes. The needs of the local population are correctly identified in the vision (affordable housing and family homes - not 'executive' detached homes). Any proposals for future development which fall outside of this democratic process must be viewed with extreme caution - especially proposals relating to land		No, I do not wish to participate at the oral examination	

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													on the periphery of the town where attempts at sustainability are likely to be just window dressing. We refer in the short term to the proposals by Grand Union Investments relating to the South Berkhamsted Concept. TTb have looked carefully at the proposals as presented to date, and they are lacking in the areas of local employment, in forward thinking energy proposals (such as district heating, or community wind/solar), in terms of transportation (provision of cycle lanes into the town, a dedicated bus route, walkable routes to town), and in their provision for local food production, and distribution.			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.2	21.2	Objecting	Yes	No	a) Justified	BRAG considers the number of proposed houses (1180) to be inflated. See BRAG submissions for paragraphs 1.13 (a), 8.9 (Table 1) and 21.1	Reduce number of homes to 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.
609833	Ms Anne Foster					Paragraph	21.2	21.2	Objecting	Yes	No	a) Justified	There is no evidence base for the figure of 1180 homes for Berkhamsted. The figure appears to be based on maximising the use of available land rather than evaluating the requirements of the town. The town council estimates that 750 homes are required to maintain the existing population of which 565 have been built or have PP. Core Strategy P 54 -Settlement Hierarchy Berkhamsted/Tring "the general approach in these locations will be to support development that enables the population to remain stable, unless a small element of growth is required to support local community needs "	The overall number of houses proposed for Berkhamsted should be justified by the housing requirements of the town. As a base figure the number required to maintain the existing population and its derivation should be specified and Policy CS1 applied	Yes, I wish to participate at the oral examination	I would like to participate in the hearings because it is important that the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making

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													The proposal for 1180 homes (57% >750) conflicts with Policy CS1 - which specifies development will be made in accordance with the settlement hierarchy.			process.
494332	mr edwin cuthbert					Paragraph	21.2	21.2	Objecting	Yes	No	a) Justified	There is no evidence based for the number of dwellings proposed for Berkhamsted under Option 2. The 1180 homes planned under the Core Strategy is based on the land available, rather than the needs of the town. I believe that this number of new homes would harm the character of the town. There has been no impact assessment on the qualitative effect of the 1180 homes on the character of Berkhamsted as an historic market town.		No, I do not wish to participate at the oral examination	
609965		Save Your Berkhamsted Residents Association	609963	Mr Alan O'Neill	Save Your Berkhamsted Residents Association	Paragraph	21.2	21.2	Objecting	Yes	No	a) Justified	<p>There is no evidence base for the number of dwellings proposed for Berkhamsted under Option 2. The 1180 homes planned under the Core Strategy are based on the land available rather than the needs of the town. We believe that this number of new homes would harm the character of the town. The town council estimates that 750 homes are required to maintain the existing population of which 565 have been built or have planning permission.</p> <p>The infrastructure of Berkhamsted is inadequate for 1180 new homes. Core Strategy Policy CS 35 states that infrastructure should be provided in advance of or alongside the proposed development unless there is existing capacity.</p>	The number of new homes proposed for Berkhamsted should be justified by the housing requirements of the town. As a base figure the number required to maintain the existing population and its derivation should be specified.	Yes, I wish to participate at the oral examination	<p>Save Your Berkhamsted Residents Association is an organisation of 250 paid up members. Its aim is....</p> <p>To represent the interests of residents of Berkhamsted and neighbouring areas with regard to current and future housing developments. In particular the Association will encourage and coordinate responses to development initiatives with the intent of preserving the character of this historic market town and its</p>

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																surrounding countryside. It is important that SYBRA is involved in the oral part of the examination
609807	Mr Grahame Partridge					Paragraph	21.2	21.2	Objecting	Yes	No	a) Justified	The Core Strategy provides no evidence to justify the figure of 1180 homes planned for Berkhamsted. The figure of 1180 represents an increase of around 16 per cent above the present number of homes in the town yet the Core Strategy states that the employment level in the town would remain at the same level as in 2011. Therefore this would mean that workers would have to travel away from Berkhamsted to seek employment. The 1180 new homes figure planned under the Core Strategy appears to be based on the land available in Berkhamsted rather than the needs of the town. An increase of 16% in housing numbers would harm the character of Berkhamsted as an historic market town. The number of new homes is therefore NOT JUSTIFIED.	The number of new homes planned under the Core Strategy to be reduced from 1180 to 750. This would allow a more modest increase in the housing numbers of 10 per cent. This figure would allow sufficient new housing stock to maintain the vibrancy of the town at the same time as preserving its character as an historic market town set in the valley of The River Bulbourne.	Yes, I wish to participate at the oral examination	
488516	mr hugh siegle					Paragraph	21.2	21.2	Objecting	No		a) Justified	A target of 1180 new homes over the plan period is too high. Windfall sites are not included but they are inevitable and taken together will increase pressure on the town's infrastructure and resources. The importance of protecting the character and nature of the town is emphasised throughout the Core Strategy; a lower number on new homes would underpin this imperative. The Durrants Lane/ Shootersway site is a ridge top location on green but not Green Belt land. The density of this		No, I do not wish to participate at the oral examination	

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													development should be reduced from 180 homes and the local allocation of 60 homes on Hanburys in the Green Belt should be removed. Any further proposals for development on Green Belt, green land or any land outside the existing Berkhamsted settlement boundary (fig 23) should be resisted as strongly as possible. These comments are also in respect of paragraphs 21.1, 21.3, 21.6, 21.7, 21.14.			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	21.2	21.2	Objecting	No	No	a) Justified	It is not Justified, Effective or Consistent with national policy. It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA. The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted. The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands. The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified	Paragraph 21.2 should read: Around 2,871 homes will be provided over the period 2006 - 2031, within the town boundary and at the Housing Allocations . A key priority will be maximising opportunities for affordable homes and family sized accommodation, especially in larger developments.	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>for the town to meet its local housing needs and natural household growth projections. This Chapter of the CS</p> <p>does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area.</p> <p>GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS</p> <p>Local Allocation under the Berkhamsted Chapter.</p>			
611410	Mr Thomas Lloyd-Evans					Paragraph	21.2	21.2	Objecting	Yes	No	a) Justified	The Berkhamsted 1,180 new homes figure appears to be based on a 'top-down' proportion of broader borough housing needs, rather than calculated through a 'bottom-up' assessment of requirements and infrastructure capability. Other areas more suitable for affordable housing developments are easily commutable to from Berkhamsted.	The 1,180 target homes figure should be scrapped or recalculated using more appropriate/transparent methodology.	No, I do not wish to participate at the oral examination	

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609833	ms anne foster					Paragraph	21.3 (and SS1)	21.3	Objecting	Yes	No	c) Consistent with national policy	No Transport Assessment assessment has been done Draft National Planning Framework para 86 states that all developments that generate significant amounts of movement as determined by local criteria should be supported by a Transport Statement or Transport Assessment. The Urban Transport Plan for Berkhamsted is not due to be started until 2012.	A full transport survey needs to be completed and included in the plan so that the impact of the proposed development at SS1 can be fully considered	Yes, I wish to participate at the oral examination	
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.3	21.3	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 the proposed housing density at Durrants Lane / Shootersway strategic site should be reflecting surrounding housing densities, while Hanburys should be removed. Hanburys should also be removed on Green Belt considerations.	Remove Hanburys as a local allocation site 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.
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	21.3	21.3	Objecting	No	No	a) Justified	It is not Justified, Effective or Consistent with national policy. It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA. The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted. The Strategic Objectives set out in	Paragraph 21.3 should read: The Future housing (around 180 homes) will be delivered through the strategic site at Durrants Lane / Shootersway (Egerton Rothesay). However, not all of the housing required can be achieved within the urban areas of the town and two Housing Allocation s have been identified at Land at South Berkhamsted and Hanburys, Shootersway.	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>the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p> <p>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural household growth projections. This Chapter of the CS</p> <p>does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area.</p> <p>GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS</p> <p>Local Allocation under the Berkhamsted Chapter.</p>			

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610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.4	21.4	Supporting	Yes	Yes		School buildings are regrettable in Green Belt but the Core Strategy is the appropriate stage in the development plan cycle to argue the case and the current educational review may alter the need for new buildings.		No, I do not wish to participate at the oral examination	
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	21.4	21.4	Supporting	Yes	Yes		<p>The identification of two education zones, one to the north west of Berkhamsted, and the other to the south east, again represent a positive response to the representations made to the Borough Council in November 2010.</p> <p>Given the scale of development proposed in the CS, the identification of two zones, each capable of delivering a 2fe school for primary age children, represents an appropriate response to the needs of the settlement during the plan period.</p> <p>The proposed changes to CS policy 23 (page 6 above), giving greater flexibility to the application of open land policies demonstrates a commitment by DBC to providing the sensible application of planning policy needed to secure on going investment and improvements to school capacity in the town. However, given the scale of housing growth envisaged, (1180 units in the plan period), the flexibility given by acknowledging the potential need for new capacity represents a responsive and positive approach to the needs for the settlement.</p> <p>It will again be important for appropriate funding and delivery mechanisms to be put in place to ensure that appropriate contributions are sought from new developments towards mitigating</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

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													<p>their impacts, and the commitment to seeking appropriate education, and other service contributions, within the Local Allocations is noted.</p> <p>Subject to these comments, HCC support the Berkhamsted Place Strategy.</p>			the Core Strategy.
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	21.4	21.4	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA.</p> <p>The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted.</p> <p>The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p> <p>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural household growth projections. This Chapter of the CS</p> <p>does not identify an assessment of</p>	<p>Paragraph 21.4 should read: Two new primary age schools are required in the town as an outcome of Hertfordshire County Council's assessment of school places in the borough. It would be prudent to plan for one 2 form entry school to the north west and another to the south east of Berkhamsted as part of the development proposals at Land South of Berkhamsted.</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>alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area.</p> <p>GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS</p> <p>Local Allocation under the Berkhamsted Chapter.</p>			
611309	Mrs Gina Bryant					Paragraph	21.4	21.4	Objecting	Yes	No	b) Effective	<p>The proposed site for a new primary school in the N W of the town is Greenbelt and is on a ridge top location, adjacent to the AONB. Building on this site would directly contradict the Core Strategy's Strategic Objective: <i>To protect and enhance Dacorum's distinctive landscape character, open spaces, biological and geological diversity and historic environment</i>.</p> <p>It also contradicts Section 21.6: <i>New development must maintain the distinctive physical and historic</i></p>	Invest in the existing schools, through expansion and improved infrastructure.	No, I do not wish to participate at the oral examination	

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													<i>character of the town and its valley setting, and will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations. Views across the valley and along the valley floor will be safeguarded'.</i>			
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 21.4	21.4	Supporting	Yes	Yes		Para 21.14 Abandonment of the Link Road Support "Hertfordshire County Council has concluded that the New Road / Springfield Road link proposal aimed at relieving traffic through Northchurch would be expensive, with no overriding benefits to warrant its inclusion in the Local Transport Plan (LTP) programme. It will therefore not be funded by the highway authority" Welcome decision [follows from an engineering study by HCC]: ends any further uncertainty.		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.
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	21.4	21.4	Objecting	No	No		The Core Strategy is unsound because it is not justified and is not consistent with national policy. The proposal to create two "education zones" in the Green Belt has not been justified by evidence of the necessity to build new schools outside the settlement boundary. These proposals contradict Policy CS5 as they comprise inappropriate and unwarranted incursion into the Green Belt, and in the case of the north-western zone, the Chilterns AONB. In both cases this in contrary to national policy.	The two zones should be removed from the text and Figure 23.	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.
609833	ms anne					Paragraph	21.5	21.5	Objecting	Yes	No	b) Effective	Currently the primary and nursery places in the town are significantly oversubscribed. Consultation will start next year on whether to build	Include projections for the overall number of primary/nursery	Yes, I wish to participate at the oral	I would like to participate in the hearings because it is important that

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	foster												<p>an additional primary school on the site of Bridgewater school (on the opposite side of the valley from SS1) or to change the system from a 3 tier to a 2 tier system. It is therefore likely to be a number of years before additional permanent capacity can be added. The 2 schools nearest SS1 cannot be expanded</p> <p>-from HCC Cabinet minutes 14th Oct 2011</p> <p>" Cabinet rejects the statutory proposal to enlarge Westfield and Greenway First Schools in Berkhamsted, by 1 form of entry each given the significant public objection to the Greenway proposal and the town planning constraints relating to both school sites"</p> <p>There are no forecast figures available for the expected additional places required as a result of the proposed SS1 -but one would assume that as the emphasis is on family homes that these would be significant.</p> <p>The 500+ homes built since 2006 without the necessary infrastructure enhancement being provided in advance of or alongside the developments of the existing town infrastructure has contributed to the current situation and conflicts with Policy CS35</p> <p>This paragraph is too vague in its assertions and gives no information as to how this aspiration will be achieved - particularly in the light of</p>	<p>schools required the additional number of places that would be required as a result of the proposed SS1 development scheduled for completion in 2015 anticipated timescales for the provision of additional school capacity</p>	<p>examination</p>	<p>the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making process.</p>

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													the proposed SS1 development ". Back to Top			
494332	mr edwin cuthbert					Paragraph	Paragraph 21.5	21.5	Objecting	Yes	No	b) Effective	The infrastructure issue concerning Primary and Nursery school places is already causing severe problems for Berkhamsted. There is a shortage of places and a proposed consultation is not due to commence until 2012. It is unlikely therefore that additional capacity would be in place to meet the proposed timescales as set out in the Core Strategy for the Strategic SS1 development.		No, I do not wish to participate at the oral examination	
609965		Save Your Berkhamsted Residents Association	609963	Mr Alan O'Neill	Save Your Berkhamsted Residents Association	Paragraph	21.5	21.5	Objecting	Yes	No	b) Effective	Berkhamsted infrastrucure has not been improved to accommodate the 565 new homes built since 2006. In particular there is a lack of school places for children in the town for both nursely and primary school education. In addition there is severe traffic congestion particularly between 8 am and 9 am and 3 pm and 4.30 pm and a chronic lack of availble parking for residents and shoppers alike. No traffic survey has been completed as part of the Core Strategy and the Berkhamsted Urban Traffic Plan is not due to be started until 2012 In both these areas we believe that the Core Strategy is not effective.	Plans to increase the number of school places in Berkhamsted and the Berkhamsted Urban Transport Plan need to be completed before any new housing developments are considered.	Yes, I wish to participate at the oral examination	Save Your Berkhasted Residents Association is an organisation of 250 paid up members. Its aim is.... To represent the interests of residents of Berkhamsted and neighbouring areas with regard to current and future housing developments. In particular the Association will encourage and coordinate responses to development initiatives with the intent of preserving the character of this historic market town and its

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																surrounding countryside. It is important that SYBRA is involved in the oral part of the examination
609807	Mr Grahame Partridge					Paragraph	21.5	21.5	Objecting	Yes	No	b) Effective	The infrastructure in Berkhamsted for children of nursery school age and those entering the first forms of primary school is inadequate in 2011. Berkhamsted Town Council's written response to the Emerging Core Strategy in 2009 is well documented on this subject and highlighted the shortage of school places for children entering the education system for the first time. The Core Strategy makes no mention of how the shortage of school places will be overcome in the early years of the strategy's timescale. The infrastructure is inadequate in 2011 and there is no strategic plan that would alleviate this problem in the Core Strategy. The Core Strategy is therefore NOT EFFECTIVE.	The Core Strategy should take into account a review of the educational needs of children entering the education system for the first time in Berkhamsted. There is presently a three tier educational system and this needs to be reviewed by Hertfordshire Education Authority to see if this structure is sustainable for the duration of the Core Strategy. Any education review should be taken before the Core Strategy is put in place. Consultation on this matter has not yet taken place and it would be better if it were before the Core Strategy is implemented.	Yes, I wish to participate at the oral examination	
611410	Mr Thomas Lloyd-Evans					Paragraph	21.5	21.5	Supporting	Yes	Yes					
609833	Ms Anne Foster					Paragraph	21.6 (and 21.7 and SS1)	21.6	Objecting	Yes	No	c) Consistent with national policy	The proposal for 180 homes on SS1 and associated playing fields is a ridgetop site on the edge of an AONB. If full use is to be made of the proposed sports fields, although not mentioned it is likely that floodlighting will be required. (as with the Astro turf pitch at Ashlyns and the recent application for Kitcheners Field) This will result in light pollution; impinge on the views	The existing playing field which is largely screened by Cox Dell and the Plantation should be retained as a playing field and public amenity space	Yes, I wish to participate at the oral examination	I would like to participate in the hearings because it is important that the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically

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													across the valley; affect the setting of an AONB and is inconsistent with Policy NE8			considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making process.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.6	21.6	Supporting	Yes	Yes		BRAG fully endorses DBC's comments. It 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 to the SE of Berkhamsted is -quasi-brownfieldll. 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 the 1990 Planning (Listed Buildings and Conservation Areas) Act. -Framingll such a building by a housing estate would be gross. Furthermore Berkhamsted is an historic Market Town. Any infilling 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 the broader population.		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.
489024	Mr Stephen					Paragraph	21.6	21.6	Supporting	Yes	Yes	b) Effective	The principle of 21.6 is sound, however it is not being applied in the case of Strategic Site SS1.	Reduce the number of dwellings in this proposal to 100 as in the current adopted Local Plan 1991 - 2011. The lower density will allow	Yes, I wish to participate at the oral	Having lived in Berkhamsted all my life and the apparent lack of

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	Proudfoot												The Land at Durrants Lane and Shootersway Berkhamsted Framework Masterplan revised October 2011 states page 8 2.19 'development is in a sensitive ridge top and edge of town location adjacent to existing housing'. The scale and density of this development on a sensitive ridge top location is not consistent with 21.6 The density of Strategic Site SS1 does not maintain the distinctive physical and historic character of the area of the town in which it is proposed.	the scheme to maintain the character of surrounding neighbourhoods as stated in Statement Vision 4 whilst there will be less adverse impact on the sensitive ridge top location. The development will then be consistent with the stated vision for the town.	examination	weight given to local residents opinions during the consultation process I would like to be able express my concerns.
611410	Mr Thomas Lloyd-Evans					Paragraph	21.6	21.6	Supporting	Yes	Yes					
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	21.6	21.6	Objecting	No	No		Berkhamsted Castle (SM 20626), the remains of a Roman building on amenity land north of the Castle (SM HT88) and a length of Grims Ditch (SM 35349) are all Scheduled Monuments. In addition, several areas have been identified within the settlement of Berkhamsted as possessing high potential for the presence of heritage assets with archaeological interest of potential national importance. Also, the present A4251, which forms the High Street, follows the line of Roman Akeman Street.	The following statement should be added to Para 21.6 in Delivering the Vision: The presence of heritage assets of archaeological interest which are potentially of national importance may be a constraint on the extent and/or design of development. Proposals will be subject to an appropriate heritage assessment, and any necessary mitigation measures.		
211660	Mr Garrick Stevens	Berkhamsted Town Council				Paragraph	Paragraph 21.6	21.6	Supporting	Yes	Yes		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.
6098	ms					Paragraph	21.7 (and SS1)	21.7	Objecting	Yes	No	a)	The proposed SS1 development,	Revisit the decision to withdraw	Yes, I wish	I would like to

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33	anne foster								g	s		Justified	includes additional sports fields together with a small amount of public amenity space around the edges. The evidence base does not take account of the fact that the existing sports field (which because of the size and nature of the school is little used) has been a public amenity space for > 30 years. (The Inspector in his report of 2002 which released the land from greenbelt appears not to have been made aware of its community use, and refers (4.19.7) to the land only as a school playing field) It has provided a safe play area for children , with safe pedestrian access from Ridgeway/Tresco Road. It is an amenity space for informal sport; golf practice, kite flying, picnics, camping, dog walking, hedgerow fruit picking etc amd most importantly it is located within the community and is of huge amenity value to the residents of Durrants Farm Estate. Although the SS1 proposal provides for additional space there is little public amenity space it is located on a busy road, is no longer within safe walking distance for many who use the existing field The Inspector's 2002 report accepted that the withdrawal of this site from greenbelt was finely balanced (4.19.12) - had he been aware of the full facts with regard the useage of the "playing field" the decision may have been different.	the SS1 land from greenbelt . If this is not possible be more specific about the amount of amenity spaceto be provided and consider that the loss of the of the existing playing field as an amenity space would have significant impact on the lives of people living in one of the less affluent areas of berkhamsted.	to participate at the oral examination	participate in the hearings because it is important that the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making process.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.7	21.7	Supporting	Yes	Yes		Maintaining a clear boundary between town and country is important too for wildlife. BRAG endorses the designation of green corridors in the Berkhamsted Vision Diagram: such routes are important		Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will

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													for the -migration, dispersal and genetic exchange of species in the wider environment (PPS9 & Draft NPPF). A whole range of protected and common species raises the quality of life for local residents. DBC is right to avoid selecting a site in SE Berkhamsted for residential development near the A41. Although the road is in a cutting, the traffic noise is considerable. Air pollution could be a significant factor under some conditions.			affect their environment and quality of life.
611410	Mr Thomas Lloyd-Evans					Paragraph	21.7	21.7	Supporting	Yes	Yes					
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	21.7	21.7	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA.</p> <p>The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted.</p> <p>The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p>	Paragraph 21.7 should read: Open space and designated Open Land, particularly the river and canal corridor, will be protected and enhanced because of their contribution to the character of the town, for outdoor recreation, and as a biodiversity resource. Land South of Berkhamsted as a Housing Allocation will secure significant improvements to green infrastructure delivering better connectivity between the town and the wider rural setting in addition to approximately 24 hectares of new publicly accessible open space. The strategic site at Durrants Lane / Shootersway (Egerton Rothesay School) will secure additional informal open space and playing fields. The contribution from other smaller open areas (such as the remnants of hedgerows in the low-density residential neighbourhoods) will be protected to provide opportunities for a network of wildspace linking the centre to the edge of the 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>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural household growth projections. This Chapter of the CS</p> <p>does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area.</p> <p>GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS</p> <p>Local Allocation under the Berkhamsted Chapter.</p>			
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	21.7	21.7	Objecting	No	No	a) Justified	This paragraph states that open space provision will increase as a result of the strategic site development. As this site of 6 hectares of existing open space is to be lost as a result of the	To be agreed with the Council.	No, I do not wish to participate at the oral examination	

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													development, this statement is extremely misleading. If the intention was to refer to public open space provision, this should be both reflected in amended wording and a requirement included that development of the site should include substantial areas of open space within it.			
515465	Mr Alan Kemp	Berkhamsted Town Council				Paragraph	21.8	21.8	Objecting	Yes	No	a) Justified	The text lacks definitive intention. In last sentence: replace "need to" with "will".		Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.
609833	ms anne foster					Paragraph	21.9 (and SS1)	21.9	Objecting	Yes	No	c) Consistent with national policy	<p>There is an assumption, without any evidence, that additional development will be good for town centre business. Given the parking constraints and traffic congestion it is just as likely that it will be detrimental for town centre businesses.</p> <p>The proposed SS1 development (a site where, because of the local topography and its distance from the town centre, access to the town except by car would be unfeasible for most people) would add to the parking and traffic issues, which are already critical and may drive people to shop outside the town.</p> <p>The proposed Water Lane development is</p> <p>dependent on Tesco has been in the Local Plan for a number of years and there is currently no time frame for its implementation.</p> <p>More than a modest increase is required to address the town's parking problems and parking relief</p>	<p>A full survey of the qualitative impact of the proposed additional housing numbers on the character of the town should be included</p> <p>An Urban Transport Plan (currently scheduled to be started in 2012) should be included</p> <p>An assessment of the parking required for the town centre, taking account of the impact of the proposed SS1 development, and proposals for its provision should be included</p> <p>A Travel Plan for the proposed SS1 development should be included</p>	Yes, I wish to participate at the oral examination	I would like to participate in the hearings because it is important that the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making process.

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													<p>should not depend on the decisions of a supermarket. It is accepted by Spatial Planning that there is little scope for additional parking, in the town.</p> <p>No Transport Assessment has been completed for the proposed SS1 development. This is not consistent with the draft National Policy Framework -Facilitate Economic Growth para 86</p> <p>No Travel Plan has been completed for the proposed SS1 development. This is not consistent with the Draft National Planning Framework -Support the Reduction in Greenhouse Gases and Emissions para 90.</p>			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.9	21.9	Supporting	Yes	Yes		BRAG notes that public car parking is already over stretched and the limited amount of additional space at the proposed new supermarket will have little impact on the current deficiencies. As a linear town in a narrow valley there is already congestion and there are limited opportunities for expansion of parking in the town centre.		No, I do not wish to participate at the oral examination	
488516	mr Hugh siegle					Paragraph	21.9	21.9	Supporting	Yes	a) Justified		It is important that the development of this area should retain a comparison shopping frontage to the High Street and at least some of the return frontage to Water Lane. The re-sited supermarket does not require an extensive High Street frontage.		No, I do not wish to participate at the oral examination	
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	21.9	21.9	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness</p>	Paragraph 21.9 should read: The key district shopping and service role of the town centre will be maintained. The proposed redevelopment of the High Street / Water Lane site will deliver high quality buildings, a new supermarket and small shop units,	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

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													<p>of the supporting SA/SEA.</p> <p>The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted.</p> <p>The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p> <p>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural household growth projections. This Chapter of the CS</p> <p>does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit</p>	<p>and improved public car parking. A new "Local Centre with a neighbourhood shopping function" will be provided as part of the Proposals at Land South of Berkhamsted. This will be in the form of a small parade of shops to serve local residents, complementary to shops and services at the High Street.</p>		<p>borough and at Berkhamsted.</p>

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													of the town and wider area. GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS Local Allocation under the Berkhamsted Chapter.			
611465	Mrs Christa Masters	Metric Property Investments Plc c/o Montagu Evans	611392	Mrs Christa Masters	Metric Property Investments Plc c/o Montagu Evans	Paragraph	21.9	21.9	Objecting	Yes	No	a) Justified	Chapter 21 - Berkhamsted Place Strategy Metric Property Investments Plc recognise the importance of Berkhamsted as a key town centre within the hierarchy of towns within Dacorum. As such, it is important that the long term vitality and viability of the town is enhanced in order for its to maintain its role and function. The reference to development at Water Lane continues the long term aspirations of the Council for this site. However, there are other key development opportunities within the town which will be available over the next plan period, such as the Former Postal Sorting office, which	The policy should be reworded as follows: 21.9. The key district shopping and service role of the town centre will be maintained and enhanced. There are a number of town centre locations which will become available for redevelopment over the plan period. These include the Former Royal Mail Sorting office premises on the High Street which are now vacant. This site represent and opportunity to deliver a high quality development, new retail floorspace in the form of convenience and/or comparisons goods floorspace, new restaurants and additional shoppers car parking to	Yes, I wish to participate at the oral examination	It is essential to input into the examination in order for the Inspector to fully consider the case being made.

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													should be recognised as opportunities to provide for this identified need for additional retail floorspace within the town.	the long term benefit of the town.		
609833	ms anne foster					Paragraph	21.10	21.10	Objecting	Yes	No	c) Consistent with national policy	The proposal is only to maintain existing levels of employment, whilst at the same time, SS1 proposes an additional 180 largely family homes in the short term. One would hope that there would be at least 1 worker per household (probably more) - with no proposals for additional employment, this would simply increase the number of commuters on already congested roads and trains. This is inconsistent with the draft National Planning Framework - Support Reductions in Greenhouse Gas Emissions and Congestion paras 88 and 92	A proposal for increased employment opportunities within the Town and on the proposed SS1 development should be included	Yes, I wish to participate at the oral examination	I would like to participate in the hearings because it is important that the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making process.
211072	Ms Katherine Fletcher	English Heritage				Paragraph	21.11	21.11	Supporting	Yes	Yes		We welcome the link made here between development of the British Film Institute site and its resource being made available locally. The Rex cinema is a particular success story in terms of the re-use of a historic building and regeneration. It may be suitable to explore a formal agreement that would benefit both the Rex and the plans of the BFI.			
211072	Ms Katherine Fletcher	English Heritage				Paragraph	21.12	21.12	Objecting	Yes	No		As discussed above in relation to paragraphs 3.22 and 8.23 we feel that the significance of Berkhamsted Castle warrants further reference and consideration within the document, and its policies. The castle is within English Heritage's guardianship and is managed with free public access. It is an integral part of the local community and a			

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													very significant historic asset within the district. We would be pleased to discuss possible additions to the text with you to ensure that this asset is part of the positive strategy for the heritage of Dacorum District.			
603361	AN Champion					Paragraph	21.13	21.13	Objecting	Yes	Yes		The addition of parking capacity at stations in Dacorum is not resolving parking issues. The cost discourages people from using it. Weekend rates should be free to encourage use of station parking.			
609833	msanne foster					Paragraph	21.13 (and SS1)	21.13	Objecting	Yes	No	c) Consistent with national policy	<p>This Paragraph is totally contradicted by the proposed SS1 site</p> <p>It is on the outskirts of the town 2km from all the main facilities of the town and the station</p> <p>It is located at the top of a steep hill 300m above the town's main facilities</p> <p>According to the calculation on the 2002 Inspectors report -this is an effective 3k</p> <p>There are very limited opportunities for sustainable travel</p> <ul style="list-style-type: none"> o Cycle routes are unfeasible because of narrow streets and on street parking o There is no bus service (and as there is no bus service to the Chiltern Park estate on the other side of the valley -unlikely ever to be one) o Only the fittest would attempt the hill from town so virtually all journeys from this site 	<p>The SS1 site is completely unsustainable it should be withdrawn as a development site as it does not comply with the statement in the paragraph and is not consistent with national policy.</p> <p>If the additional housing proposed for Berkhamsted can be justified, it should be located in more sustainable places. The Hill Top site and the New Lodge sites would both be significantly more sustainable and development at the Hill Top site would also provide much needed funds for Ashlyns our community secondary school</p>	Yes, I wish to participate at the oral examination	I would like to participate in the hearings because it is important that the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making process.

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													<p>whether for work leisure or shopping would be made by car.</p> <p>The nearest primary school (Westfield) is at least 600m away is at capacity; cannot be extended and is also down a steep hill The next nearest (Greenway) is also full and cannot be extended</p> <ul style="list-style-type: none"> o Primary school children would also need to be taken to school by car <p>The additional parking deck at the station provided no parking relief for the town - at £6 a day it is only used by commuters and even then, because of the cost, only if on street parking (even at some distance) is not available.</p> <p>The "modest additional parking" to be provided by the Water Lane development is dependent on Tesco and there is no time frame for this development.</p> <p>No survey of parking requirements is included in the documentation - even though this is a major issue for the town. Residents permits have recently been introduced to restrict commuter on street parking - but that also restricts parking opportunities for town centre users and exacerbates the parking problem for people wishing to use the towns facilities.</p> <p>The proposed SS1 development is inconsistent with Draft National</p>			

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													Planning Framework -Support Reduction in Greenhouse gas and Congestion paras 88 - 92			
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Paragraph	21.13	21.13	Objecting	Yes	No	b) Effective	<p>While BRAG supports the comment "careful location of new development and promoting opportunities for sustainable travel" BRAG considers it is not sufficiently specific in addressing the issues for Berkhamsted. BRAG would point out that promoting -sustainable transport optionsll can be tried but achievement of the objectives is another matter.</p> <p>BRAG would query the effectiveness of plans to deal with the traffic from the Egerton Rothsay strategic site. A Green Travel Plan for the school's transport would in itself generate coach and bus traffic which would impede other modes of wheeled transport down to the High Street. The strategic housing allocation would generate an additional 1260 vehicle movements per day (allowing 7 movements per house), 10% of which would be in rush hour, which would coincide with travel to the school. The same would apply to any other ridge top site.</p> <p>The topography of any ridge development would act as a major deterrent to cycling and walking for all but the fittest members of the community. Therefore it is imperative that a bus service is laid on for the housing and leisure use which is <i>commercially viable in the long term</i> : all too often bus services terminate after the expiry of the first five years of the s.106 agreement because they attract insufficient <i>paying</i> passengers. In these days of financial stringency when LPA's are</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.

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													reviewing concessionary fares, even pensioners are likely to resume driving if the concession is removed. There is nothing in the Core Strategy which demonstrates how exactly this fundamental problem will be solved in terms of finances and commercial partners, let alone -in advance of or alongside the developmentll as promised by CS35.			
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills	Paragraph	21.13	21.13	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA.</p> <p>The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted.</p> <p>The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p> <p>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural household growth projections. This</p>	<p>Paragraph 21.13 should read: The careful location of new development and promoting opportunities for sustainable travel, including improved cycle routes and facilities (for example at the train station), will in part help tackle a</p> <p>number of parking and traffic issues in the town. An additional deck at the railway station car park and the development of the Water Lane / High Street site will also provide for a modest increase in spaces. The potential provision of a new link road to the south of the town as a result of the new development at Land South of Berkhamsted and road improvements at the junction of Shootersway / Kingshill Way will be linked to new housing development.</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>Chapter of the CS</p> <p>does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives (and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area.</p> <p>GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS</p> <p>Local Allocation under the Berkhamsted Chapter.</p>			
610088	Mr Martin Hicks	HBRC				Paragraph	21.14	21.14	Supporting	Yes	b) Effective		I support the LTP approach in respect of the New Road / Springfield Road link given its ecological implications. A new road would require a large, deep cutting that would effectively destroy the chalk grassland Wildlife Site. It is the last remaining fragment of the former Tunnel Fields network of calcareous grasslands, all of which have been lost to housing within the last 25 years.		No, I do not wish to participate at the oral examination	
4943	mr					Paragraph	Paragraph 21.14	21.14	Objectin	Yes	No	a)	With regard to existing and		No, I do not	

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32	edwin cuthbert								g	s		Justified	additional traffic congestion, there has been no traffic survey completed as part of the Core Strategy. The Berkhamsted Urban Transport Plan is not due to commence until 2012 and if congestion relief was possible, it is unlikely that any measures would be completed to meet the timescale proposed for the Strategic Site SS1 identified in the Core Strategy. It is therefore not consistent with the Draft National Planning Framework.		wish to participate at the oral examination	
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Paragraph	21.14	21.14	Supporting	Yes	Yes		Transition Town Berkhamsted support strongly this paragraph. In fact, we would encourage the wording to be made stonger. The abandonment of the link road concept is to be applauded. Traffic calming measures in Northchurch to directly benefit the school could be taken further with the aim of 'reclaiming Northchurch High Street from cars, and giving it back to the local population'. The vision for this part of the town could include a traffic calmed area, wider pavements, pedestrian crossings, and vibrant businesses on both sides of the road. What a pleasure it could become for those who live nearby.	Revised text could read as follows: Hertfordshireresolved through the Berkhamsted Urban Transport Plan and improvements implemented as funding opportunities arise. These highway safety improvements should help alleviate existing air quality issues in this part of Northchurch, and would aim to reclaim this part of our town from the motor car, and for the benefit of the residents and visitors.	No, I do not wish to participate at the oral examination	
515465	Mr Alan Kemp	Berkhamsted Town Council				Paragraph	21.14	21.14	Supporting	Yes	Yes		BTC particularly supports the abandonment of the Link Road.		Yes, I wish to participate at the oral examination	To fully reflect and articulate the Town Council's representations.
617337	Ms Yvonne Crocker	Northchurch Parish Council				Paragraph	21.14	21.14	Objecting	No	No		Both the Borough Council and Hertfordshire County Council have had more than enough opportunities to correct the errors in Northchurch High Street (i.e. narrow paths near Northchurch School, poor quality of air in Northchurch High Street) and, to date, have ignored the opportunities to correct these problems. The Core Document		Yes, I wish to participate at the oral examination	

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													<p>indicates that the preferred approach is to drop the completion of the link road and address highway safety and poor air issues around St Mary's School and at the junction of New Road and the A4251. There have been absolutely no plans and provisions for this; it is just "pie in the sky" and is included in order to be able to justify the decision regarding the link road.</p> <p>Some time ago, the people of Northchurch submitted a 300 strong petition requesting that action be taken to implement the provisions made in the previous Dacorum Plan. Again, the petition was ignored and hasn't even been mentioned in this document. The quality of air in Northchurch has been poor for many years. There are no firm plans to correct any of these errors and, as indicated, no effort has been made to satisfy the people of Northchurch.</p> <p>There is an opportunity for something to be done in this direction by the provision of the link road being connected to development in Lock Field off New Road in Northchurch, which would be an ideal position for low-cost housing providing that the access was not over the Northchurch canal bridge. The bridge has already been established by a previous Appeals Inspector as unsatisfactory for this type of development. The development could help to fund the link road which, in any case, is not going to be exorbitant.</p>			

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													The people of Northchurch feel that it is advisable to point out to both the County Council and the Borough Council that bridges in Billet Lane (railway and canal) were both strengthened at a cost of some £500,000 - money which, if this plan is accepted, will be wasted. Incorrect, inefficient investigation, which preceded the publication of the Core Strategy, has been the matter most apparent to Northchurch in this document. The community has the right to feel sidelined by the comments and the attitudes of both Hertfordshire County Council and Dacorum Borough Council in looking at this issue.			
484719	Mr. Roy Warren	Sport England				Strategic Site Shootersway/Durrants Lane.	Proposal SS1	Table SS1	Objecting	Yes	No	b) Effective	While no objection is made in principle to Proposal SS1 relating to the mixed use scheme at Durrants Lane/Shootersway as the proposals make provision for replacing the school playing fields and providing new community playing fields, there is a concern that the Delivery section of the proposal or the Framework Masterplan Document (October 2011) does not make reference to the need to engage Sport England in the masterplanning and delivery of the project. This is important because Sport England is a statutory consultee on planning applications affecting playing fields and an objection at the planning application stage could significantly delay the implementation of the proposals. As the development would have a major impact on playing fields, it is important that Sport England is	To address the concerns that have been raised, it is requested that Proposal SS1 makes reference to the need to engage with Sport England as a statutory consultee throughout the process leading up to the submission of a planning application in order to minimise the potential for objections which could cause delays to the delivery of the project. Sport England would be willing to discuss the proposals in more detail with the Council and other stakeholders at the appropriate time.		

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													<p>engaged with and supportive of the detailed plans for implementing the development at an early stage in order to avoid potential delays and uncertainty at a later date. Consequently, there is a concern that Proposal SS1 will not meet the 'effective' test of soundness as the ability to deliver 180 homes and other uses by 2014/15 on the site will be influenced by Sport England's position as a statutory consultee especially as the provisions of the Town and Country Planning (Consultation) (England) Direction 2009 would apply if Sport England objected to a future planning application i.e. an application would need to be referred to the Secretary of State if the local authority was minded to approve a planning application that was contrary to an objection from Sport England.</p> <p>Sport England would wish to work with the Council and the landowner/developer to reach a mutually agreeable position before the proposals reach the planning application stage in order to avoid the potential scenarios set out above. While it would be premature for Sport England to make detailed comments on the proposals for the site through this consultation, one issue of potential concern that I would wish to highlight at this stage is the proposal to locate the community playing fields on the other side of Durrants Lane from the parking and changing facilities that will support these playing fields. This proposal raises major potential safety concerns especially as the majority of the users of the playing fields will be expected to be children and young people. Measures to ensure that users of the community playing field can safely cross</p>			

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													Durrants Lane therefore need to be incorporated into the masterplan for the site to ensure that the playing field can be safely accessed.			
489024	Mr Stephen Proudfoot					Strategic Site Shootersway/Durrants Lane.	Proposal SS1	Table SS1	Objecting	Yes	No	a) Justified	<p>The vision for Berkhamsted states 'New development must maintain the distinctive physical and historic character of the town and its valley setting, and will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations'.</p> <p>However the - Land at Durrants Lane and Shootersway Berkhamsted Framework Masterplan revised October 2011 states page 8 2.19 'development is in a sensitive ridge top and edge of town location adjacent to existing housing'.</p> <p>The SS1 proposal is inconsistent with the vision for Berkhamsted</p>	Reduce the number of dwellings in this proposal to 100 as in the current adopted Local Plan 1991 - 2011. The lower density will allow the scheme to maintain the character of surrounding neighbourhoods as stated in Statement Vision 4 whilst there will be less adverse impact on the sensitive ridge top location. The development will then be consistent with the stated vision for the town.	Yes, I wish to participate at the oral examination	Having lived in Berkhamsted all my life and the apparent lack of weight given to local residents opinions during the consultation process I would like to be able express my concerns.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Strategic Site Shootersway/Durrants Lane.	Table SS1 Strategic Site Shootersway/Durrants Lane	Table SS1	Objecting	Yes	No	a) Justified	<p>BRAG welcomes in part the proposals.</p> <p>With regard to the Egerton Rothsay School, it should be borne in mind that although this is a private school, it offers valuable education for children with specific educational needs aged 5 -16, this includes educating "statemented" children. It is a facility available for the wider community and therefore BRAG welcomes the prospect of improvement both educationally and in terms of leisure facilities.</p> <p>However, this should not be at the expense of over development. BRAG submits that DBC's own figures point to 750 homes being required to maintain a stable population (see BRAG response to 1.13 (a) and 8.9 Table 1), which would allow the SS1 site to be</p>	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.

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													developed in sympathy with surrounding housing density.			
607431	Mrs Kate Harwood	Hertfordshire Gardens Trust				Strategic Site Shootersway/Durants Lane.	Proposal SS1	Table SS1	Objecting	Yes	No	a) Justified	This area is an edge of town site and on a ridge overlooking (and part of) the Green Belt. Development here would have an adverse impact on the Green Belt and on the character of Berkhamsted, contrary to the vision for Berkhamsted statement.	The number of dwellings in this area should not exceed the target of 100 set in the current Local Plan (-2011) to minimise adverse impact.	No, I do not wish to participate at the oral examination	
609833	Ms Anne Foster					Strategic Site Shootersway/Durants Lane.	SS1	Table SS1	Objecting	Yes	No	c) Consistent with national policy	<p>The online consultation allows the selection of only 1 category. As my comments would come under all 3 categories for unsoundness I will itemise them here:-</p> <p><u>Not Consistent with National Policy</u></p> <p>The location of this site is on the edge of Berkhamsted at least 2km from the town's main facilities and Station on the valley floor</p> <p>It is 300m above the valley floor up steep roads giving an effective distance of 3km using the methodology quoted in the 2002 Inspectors report</p> <p>It is at least 600m down a steep hill to the nearest Primary school. Both this and the next nearest are currently at capacity and cannot be extended (HCC Cabinet minute of 14th Oct 2011)</p> <p>Cycle/walking paths to the valley floor are unfeasible because of narrow roads, on street parking and very steep slopes</p> <ul style="list-style-type: none"> o Down maybe possible, up not - except for the fittest <p>The statement in</p>	<p>If the additional housing numbers required to meet the needs of Berkhamsted can be justified, development should be on more sustainable sites which would have less impact on the character and day to day life of the town . Both the Hill Top and New Lodge sites offer much more sustainable options for development.</p> <p>The Urban Transport Plan should be completed and the feasibility of making major improvements to congestion and parking together with costs funding options and timescales should be produced prior to this development being supported otherwise Policy CS35 cannot be complied with</p>	Yes, I wish to participate at the oral examination	I would like to participate in the hearings because it is important that the special nature of Berkhamsted (its constrained valley situation; topography; historic character etc) is specifically considered when judgements are made rather than general statistics and that local knowledge is considered in the decision making process.

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													<p>the Sustainability Appraisal that cycle/walking paths will mitigate car journeys is therefore an incorrect assumption</p> <p>There is no proposed employment or Dr's surgery on the site</p> <p>Car ownership will be essential to living on this site</p> <p>There is no proposed bus service</p> <ul style="list-style-type: none"> o Nearest buses (30/31) are twice a day along Ridgeway to the North of the site o There is currently no bus service serving the Chiltern Estate on the opposite side of the valley - so it is unlikely that a bus service to this site would be viable <p>This cannot be deemed a sustainable development and more sustainable sites are available (New Lodge and Hill Top Road)</p> <p>This site is therefore inconsistent with the Draft National Planning Framework - Support Reductions in Greenhouse Gas Emissions paras 88 to 93</p> <p>No Travel Plan has been produced for this site -this is inconsistent with the Draft National Planning Framework - Facilitate Economic Growth para 86</p>			

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													<p>For effective and maximum use of the proposed sports field floodlighting would be essential. This would cause light pollution across the valey and affect the setting of an AONB which is inconsistent with Policy NE8</p> <p><u>Not Justified</u></p> <p>In 2002 the land was released from Green Belt for the provision of 100 houses. The Inspector said the decision was finely balanced (4.19.12) and the loss of the school playing field would be more than compensated for by the provision of a more extensive area of open space which would be available to a wider public (4.19.7) .</p> <p>Clearly the Inspector was unaware that the existing "playing fields" have been a public amenity space sited within the community for > 30 years and provide a safe play area with safe pedestrian access from Ridgeway/Tresco Road, and been used by the local community for informal sport; picnics, camping' jogging, kite flying; berry picking, family activities dog walking etc. Although the proposal provides for additional pitches they are sited on a busy road with no safe access for children; are located outside the existing community and there appears to be less (no figures given) public amenity space than is currently available.</p> <p>The number of homes proposed has been increased from 100 to 180 "to pay for the redevelopment of the school" this is specified in para 2.16 of the October 2011 Framework Master Plan (the phrase " <i>In any event there is a requirement for increased housing provision in the</i></p>			

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													<p><i>Borough</i> ") having been added since the previous version.</p> <p>the existing playing field is owned by HCC and rented by the school</p> <p>the school would loses no land as a result of the proposed development - indeed would gain additional land adjacent to the school</p> <ul style="list-style-type: none"> o this was in the plan when the proosal was for 100 houses and the site was released from Green belt in 2002 <p>access to the proposed development is from Shootersway not across school land</p> <p>There is therefore no justification for increasing the number of houses to pay for the redevelopment of a private school. FOI requests to HCC and DBC and reapeated questions to local councillors and Spatial Planning have failed to elicit any information as to why this is required.</p> <p>FLOOD RISK</p> <p>The assesment of Local Sites and Strategic Allocations -p165 states that the site does not present any flood risk.</p> <p>For many years houses along Ridgeway bordering and below the level of the school field, flooded after heavy rain requiring the Fire Brigade to pump them out. This was alleviated some years ago by a soakaway/drain dug along Grimms</p>			

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													<p>Ditch.</p> <p>Development here would reduce the amount of rainwater that can be absorbed by the site and could re introduce a flood risk to those homes on Ridgeway.</p> <p>There is no evidence that this has been considered in the planning of this development</p> <p>There is no valid justification for the proposed Increase in the numbers from 100 to 180</p> <p>There is no justification for the loss of public amenity space located <u>within</u> the community when the full information about the use of this site was not provided to the Inspector in 2002</p> <p>There is no justification for development on a site with huge sustainability issues when more sustainable sites are available</p> <p>The Flood Risk to homes on Ridgeway should be assessed</p> <p><u>Not Effective</u></p> <p>Schools -there are currently insufficient primary/nursery places to meet demand and figures are not available for the additional demand that would be generated by this development. Latest figures are;</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Demand</th> <th>Capacity</th> </tr> </thead> <tbody> <tr> <td>10/11</td> <td>249</td> <td>252</td> </tr> <tr> <td>11/12</td> <td>276</td> <td>252</td> </tr> </tbody> </table>	Year	Demand	Capacity	10/11	249	252	11/12	276	252		
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10/11	249	252																						
11/12	276	252																						

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													<p>temporary expansion at Westfield to accommodate surplus</p> <p>Forecast:</p> <p>12/13 313 252 + plans are being prepared for further temporary expansions next year</p> <p>13/14 318 Depends on the outcome on the present consultation</p> <p>Consultation starts 2012 as to whether an additional primary school will be provided on the Bridgewater site (the opposite side of the valley to SS1) or the school system will be changed from a 3 to a 2 tier system. Either way it is unlikely that additional permanent capacity will be available to meet the proposed timescales (completion by 2014/15)</p> <p>Water</p> <p>The Hyder Water Cycle Survey indicates that capacity to the West of Berkhamsted is suitable only for Rural levels of development. Hyder/Veolia have confirmed (email)</p> <p>"Veolia Water Central indicated that the current trunk main supplying Berkhamsted enters the town from the east. Therefore, development sites in the west of the town (and the rural area between here and Tring) are likely to require the provision of more extensive network upgrades than sites in the east. Small sites (i.e. 10 dwellings or less) can likely be accommodated relatively</p>			

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													<p>easily by connection to the existing network, however larger sites will present more of a challenge.</p> <p>Upgrades to the network through the existing town may be required, or the provision of a new bypass main linking any sites in the west to the incoming trunk main in the east. This may drive the costs up for developers, and may introduce a delay of up to three years whilst network capacity is provided "</p> <p>Traffic and Parking</p> <p><i>The assesment of Local Sites and Strategic Allocations -p59</i> states that no work has been done to quantify the level of congestion in berkhamsted</p> <ul style="list-style-type: none"> o In a town where this is such a huge issue, it is incomprensible that plans for such a large develoment have been produced without such an assesment. <p>The Highway Authority estimates that the dwellings will generate 90 vehicles in peak periods - <i>The assesment of Local Sites and Strategic Allocations - p165</i></p> <p>There is no infomation to validate this figure; it is not specified as uni or bi directional and peak periods are not defined.</p> <p>If it is deduced frm the</p>			

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													<p>TRICS database this does not allow for local topography to be factored in so in view of the location of the site the actual figure is likely to be significantly higher.</p> <p>The only traffic issue addressed is that of Shootersway which has significant congestion at peak times particularly the morning peak when school and work traffic coincide. Junction improvements are proposed to alleviate this but as they are dependent on funding from the development the congestion will get worse before it gets better.</p> <p>There is a danger of a Rat Run to the town centre down a private road with no pavements (Shootersway Lane) . Shootersway Lane/Greenway/Crossoak road gives access to the town centre at the "Waitrose end of the high street" and avoids the congestion on Shootersway and that generated on Kings Road /Lower Kings Road by the 4 way lights and the cars backing up from the main car park</p> <p>No attempt has been made to assess the impact fo traffic from the site on the major congestion and parking problems in the town centre.</p> <p>The Urban Transport Plan will not be started until next year so if congestion and parking relief for the town centre is possible, it is unlikely to be implemented to meet the proposed</p>			

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													<p>timescales for SS1 If it is not possible SS1 which would be a heavily car dependent development should not go ahead</p> <p>FLOOD RISK</p> <p>The assesment of Local Sites and Strategic Allocations -p165 states that the site does not present any flood risk.</p> <p>For many years houses along Ridgeway bordering and below the level of the school field, flooded after heavy rain requiring the Fire Brigade to pump them out. This was alleviated some years ago by a soakaway/drain and dug along Grimms Ditch.</p> <p>Development here would reduce the amout of rainwater that can be absorbed by the site and could re introduce a flood risk to those homes on Ridgeway.</p> <p>There is no evidence that this has been considered in the planning of this development</p> <p>The proposal is considered not effective because significant infrastructure issues and associated costs could make it undeliverable</p>			
494332	mr edwin cuthbert					Strategic Site Shootersway/Durants Lane.	SS1	Table SS1	Objecting	Yes	No	b) Effective	The Water Cycle Survey identified issues with the network infrastructure to the west of Berkhamsted as suitable only for rural levels of development. The survey produced by Hyder stated that the current water trunk supplying Berkhamsted enters the town from the east Therefore, development sites to the west of the town, such as Strategic Site SS1, are likely to require the provision of	No, I do not wish to participate at the oral examination		

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.
													more extensive network upgrades than sites to the east of Berkhamsted. Any upgrades to the network through the existing town may be required, or the provision of a new bypass main linking any sites in the west to the incoming water trunk main to the east. This would have the effect of increasing the cost of new housing developments whilst the network capacity is provided. I believe that the Strategic Site SS1 may not be deliverable in the time frame envisaged.			
328864	Mr Danny Bonnett	Transition Town Berkhamsted				Strategic Site Shootersway/Durrants Lane.	Table SS1	Table SS1	Objecting	Yes	No	c) Consistent with national policy	<p>The principles listed for the development of this site list the following:</p> <p style="padding-left: 40px;">The impact of the scheme on the local road network will need to be mitigated through promoting sustainable transport options, reinforcing pedestrian / cycle links through the site, and funding improvements to the Shootersway / Kingshill Way and Durrants Lane / High Street junctions.</p> <p>This is inconsistent with national policy because the language is too weak, and it implies a modest mitigation of the business as usual transport situation for a development such as this. As pointed out in our comments on the overall objectives for the strategy, to be consistent with national targets to reduce our greenhouse gas emissions, new developments must be radical in their thinking, they should bring such a positive environmental influence to the surrounding community that they bring DOWN the average (per capita) emissions. With transport this can be achieved by providing</p>	<p>The first of the 'principles' set out in the table below should read as follows:</p> <p>Through it's creation, and ongoing occupation, this site shall have a net positive effect on the local environment of the town through a per capita reduction in carbon emissions, in total car journeys, an increase in human health, strengthening of biodiversity, strengthening of local food production, reduction in energy use, reduction of water use and an improvement in community cohesion.</p>	Yes, I wish to participate at the oral examination	TTB believe that the principles of sustainable development have not yet been correctly interpreted when forming this document. We would like the opportunity to expand on the points made above, and to present directly how we see the planning process and development opportunities working to deliver a community that will minimise it's impact on the planet, and whose residents will benefit from a better quality of life.

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													<p>sustainable transport choices, funded by the sale of properties in the new development (examples a funding a hydrogen powered round-town bus, with hydrogen created with electricity from a community wind turbine; provision of cycle lanes giving school children safe routes to their schools, not just from the new development, but to other parts of town too; permanently modifying bus routes on a sufficient frequency to take people out of their cars; etc).</p> <p>The same principles of impact beyond the dwelling can come from community energy schemes, from energy efficiency as made available to the public through community centres/buildings with an educational objective (like the RES building in Kings Langley), from facilities for local food production, and from water harvesting and storage schemes. It is on this basis that new schemes should proceed through to detailed planning applications. This comment applies specifically to the 2 sites described in this section, and in general to any sites considered for development in Berkhamsted and Dacorum.</p>			
221859	Mr Nick Hanling					Strategic Site Shootersway/Durrants Lane.	SS1	Table SS1	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p><u>Environmental impact of site SS1.</u></p> <p>The environmental impact report commissioned by the landowners and published in 2008 assessed the impact of 100 homes. No environmental assessment of the impact of the proposed development of 180 homes has been published as part of this or</p>	Reduce the number of dwellings in this proposal to 100 as in the current adopted Local Plan 1991 - 2011, that these dwellings be no higher than two storeys and that any development on this site should finance improvements to pedestrian and cyclist facilities along Shootersway and Durrants Lane to mitigate the significant extra car traffic caused by the development.	Yes, I wish to participate at the oral examination	Some responses on site SS1 in previous consultations do not appear to have been acknowledged or addressed by the Borough Council in subsequent versions of the Core Strategy and so I am concerned that

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													<p>previous consultations.</p> <p>The vision for Berkhamsted states 'New development must maintain the distinctive physical and historic character of the town and its valley setting, and will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations'.</p> <p>However the "Land at Durrants Lane and in paragraph 2.19 that "development is in a sensitive ridge top and edge of town location".</p> <p>The SS1 proposal is inconsistent with the vision for Berkhamsted</p> <p><u>Accessibility of site SS1</u></p> <p>Paragraph 9.6 of the pre- submission Core Strategy states: "New development will be guided to more accessible locations that are well connected to a range of uses and integrated with other travel modes".</p> <p>The "Dacorum Borough Local Plan Inquiry - Inspector's Report - August 2002" concluded that this site would had "one of the lowest scores [for accessibility] of any site identified in the Plan" and that "the site is located a significant distance from the nearest local centre and is even further from the railway station. The nearest primary school would be over 600 metres away, which is well beyond the distance specified in "Sustainable Settlements" (CD86)".</p> <p>The "Land at Durrants Lane & Shootersway, Berkhamsted</p>			this will occur again.

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													<p>Framework Masterplan Document Revised October 2011" refers to the bus services being "within 600/700 metres from the site" but neglects to mention that the walk to the site from the bus stops is up a 12% gradient hill. The steepness of the gradient and insignificant local amenities will result in car as the primary means of travel from any houses on the site.</p> <p>The SS1 proposal is inconsistent with paragraph 9.6.</p> <p><u>Sustainability of site SS1</u></p> <p>Paragraph 9.7 of the pre-submission Core Strategy states: "All major new development proposals should include a package of sustainable transport measures to reduce reliance on the private car".</p> <p>Proposal SS1 refers to pedestrian/cycle links "through the site" but does not include any statement to establishing or improving such links in the surrounding areas. Shootersway and Durrants Lane have pavements on one side of the road only at best and form part of a busy traffic thoroughfare.</p> <p>The SS1 proposal is inconsistent with paragraph 9.7.</p> <p>Table 6.4 in "Sustainability Report-Dacorum Draft Core Strategy-Final.pdf"</p> <p>demonstrates that the proposed development has a lower sustainability appraisal than the development proposed in the Current Local Plan. The</p>			

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													<p>Sustainability Report also states that the proposed development is "forecast as likely to result in a number of adverse environmental effects" and highlights the risk of adverse impacts on air quality, health and wellbeing that would result from the proposed development.</p> <p>The Habitats Regulation Assessment states that "All major developments in Hemel Hempstead, Berkhamsted and Tring should aim to provide as many on-site facilities as possible, in order to reduce the need to travel. These should include GP facilities, retail outlets, schools, community facilities and public open space."</p> <p>Proposal SS1 (designated a "strategic site" in the Core Strategy) has no plans for GP facilities, retail outlets or schools on the site. The ""Land at Durrants Lane & Shootersway, Berkhamsted Framework Masterplan Document Revised October 2011" refers to a small newsagent/shop and hairdresser in Tresco Road in figure 3.1.</p> <p>Egerton Rothesay is a fee-paying school and has a relatively low level of Berkhamsted residents compared to schools much further away from the site.</p> <p>Proposal SS1 is inconsistent with the Habitats Regulation Assessment <u>Inconsistency between Proposal SS1 and the "Land at Durrants Lane & Shootersway, Berkhamsted Framework Masterplan Document Revised October 2011"</u> .</p>			

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													The Core Strategy Proposal SS1 refers to two storey dwellings as a principle for development. The "Land at Durrants Lane & Shootersway, Berkhamsted Framework Masterplan Document Revised October 2011" is inconsistent with this principle as it includes references to some 2½ storey development on the site in point 12 of paragraph 6.1.			
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Woolf Bond Planning	Strategic Site Shootersway/Durrants Lane.	SS1	Table SS1	Objecting	No	No		<p>Subject to viability matters, the proposed strategic housing allocation at 'Land at Durrants Lane/Shootersway, Berkhamsted' offers the following opportunities in meeting the aims of the proposed core delivery policies. These opportunities are summaries below:</p> <p>8 – Sustainable Transport: Contribute towards meeting identified housing as well as helping to provide for sustainable patterns of development. Sustainable linkages could be provided to encourage travel by sustainable modes, including walking and cycling. A Travel Plan would be submitted with any application for development of the site in order to help reduce the need to travel by car.</p> <p>18 – Mix of Housing: Provide a mix of housing, types, sizes and tenures in accordance with the most up to date assessment of local needs.</p> <p>19 – Affordable Housing: Provide for a material amount of affordable housing to meet specific needs in the local area.</p> <p>26 – Green Infrastructure: Provide for a material amount of open space and formal playing field provision in accordance with the identified</p>		No, I do not wish to participate at the oral examination	

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													<p>requirements.</p> <p>28 – Carbon Emission Reductions & CS29 – Sustainable Design & Construction: Potential for renewable and sustainable and best practice design measures to be included within proposals.</p> <p>31 – Water Management: The site is not within an area of flood risk and development of the site can be designed to incorporate SuDS so as to mitigate any surface water drainage concerns on site. Accordingly, development of this site for housing is sequentially preferable in flood terms than providing for development in areas that are at risk.</p> <p>35 – Infrastructure & Developer Contributions: Where appropriate our clients are willing to make contributions towards meeting the demands placed on local services and facilities.</p> <p>The proposal should refer to a development of ‘around’ 180 dwellings. We are of the view that the ‘principles’ should refer to a scheme for a mix of storey heights, including up to two and a half storeys where such heights are demonstrated to enhance the overall scheme design and provide for enclosure of public and private space as appropriate.</p> <p>‘Principles’ refer to an expectation for ‘around 40% affordable homes’, clearly this is subject to viability matters and therefore we suggest the following additional wording: -around 40% affordable homes subject to detailed viability assessment. Further in regard to ‘delivery’ we note the priority is to</p>			

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													deliver the school playing fields first', however clearly there will be a need to deliver a first phase of housing development in order to generate the funds necessary to deliver the playing fields. In turn, we suggest that this wording is amended to read -there will be a priority to delivery school playing fields alongside the first phase of housing developmentll.			
609807	Mr Grahame Partridge					Strategic Site Shootersway/Durrants Lane.	SS1 (also 21.3 and 21.13)	Table SS1	Objecting	Yes	No	a) Justified	<p>The core strategy is not justified or effective.</p> <p>The Core Strategy includes a Strategic Site development SS1 at Shootersway/Durrants Lane for around 180 homes. This site is on the outskirts of Berkhamsted and the majority of new homes planned for the Strategic Site would be located over 2 kilometres from the train station and over 1.5 kilometres from the shops in the High Street which is the main retail centre for Berkhamsted. This distance would mean that residents would be likely to travel by car to access the shopping facilities in the town as there is no community public transport service planned for the area. The Core Strategy does not take into account the topography of the Shootersway/Durrants Lanesite which is on a ridge top approximately 300 feet above the level of the high street shops.</p> <p>There is an argument, in planning terms, that this 300 feet height difference would result in residents travelling back up the steep valley sides after shopping and this would increase this distance by 50 per cent. Therefore the 2 kilometers could in effect be 3 kilometers from the train station and around 2.25 kilometers from the retail shops. This distance is too far for residents</p>	<p>To eliminate the development of the Strategic Site SS1 until such time that the Berkhamsted Urban Transport Plan has been undertaken and reviewed by Dacorum Borough Council and its findings published for consultation.</p> <p>The Berkhamsted Urban Transport Plan due to commence in 2012 would be able to incorporate the needs of Strategic Site SS1. This plan would also identify the needs of town centre parking which would be needed if residents from SS1 were travelling by car into Berkhamsted.</p>	Yes, I wish to participate at the oral examination	

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													<p>to walk especially if returning home with shopping.</p> <p>The Core Strategy makes no detailed availability of additional car parking facilities in the town to accommodate the increase in demand from residents living in this Strategic Site location. The only mention of additional parking is a reference to Tesco plc providing some extra spaces. This is not a sound basis for a Core Strategy and therefore the Core Strategy is NON EFFECTIVE.</p> <p>The Core Strategy makes no mention of a traffic survey to analyse the impact of any increase in car population numbers for Berkhamsted. The Berkhamsted Urban Transport Plan is not due to commence until the year 2012 and if congestion relief was possible it would be unlikely that any traffic congestion measures would be completed to meet the timescales proposed for the Strategic Site SS1. The Core Strategy is therefore NOT EFFECTIVE.</p> <p>The Strategic Site SS1 would not support the Vision for Berkhamsted as set out in the Core Strategy. The Strategic Site is on the outskirts of the town on a ridge top, 300 feet above the valley floor and at least 2 kilometres from the railway station and at least 1.5 kilometres from the retail shopping centre in the High Street and surrounding roads such as Lower Kings Road with the Waitrose supermarket.</p> <p>If the steepness of the slopes from the valley floor are taken into consideration these distances can be increased by a factor of 50 per cent for travelling purposes. The</p>			

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													<p>Vision for Berkhamsted as part of the Core Strategy stated that Berkhamsted is a sustainable and vibrant town where travel by non-car use is promoted. This would not be the case with Strategic Site SS1 because there is no public transport system proposed for the location.</p> <p>The Core Strategy is therefore UNSOUND because it would not support the Vision for Berkhamsted.</p> <p>The Vision for Berkhamsted should be adopted as part of the Core Strategy. This would preserve the character of the historic market town that has been developed over many centuries. It would leave a permanent legacy for future generations to enjoy in the same way that those who live in Berkhamsted enjoy in 2011.</p> <p>There is an Assessment of Local Allocations and Strategic Sites Highways estimate for the Strategic Site SS1 at Shootersway/Durrants Lane that an additional 90 trips would be generated from SS1. I believe this figure has been derived from the TRICS database which does not allow for the topography of the site and its surrounding area to be factored in.</p> <p>The Strategic Site SS1 is located on a ridge top, 300 feet above Berkhamsted High Street, and at least 2 kilometres from the train station and these number of trips should be challenged because the figure would be higher if the topography of the area and the distance from local schools and facilities were factored in. Therefore the assumptions made in the Core</p>			

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													Strategy are NOT JUSTIFIED.			
6099 65		Save Your Berkhamsted Residents Association	6099 63	Mr Alan O'Neill	Save Your Berkhamsted Residents Association	Strategic Site Shootersway/Durants Lane.	Strategic Site SS1	Table SS1	Objecting	Yes	No	a) Justified	<p>The Vision for Berkhamsted as part of the Core Strategy states that Berkhamsted is a sustainable and vibrant town where travel by non-car use is promoted .The Strategic Site SS1 is on the outskirts of the town on a ridge top and approximately 2 km from the town centre and railway station. If the steepness of the slopes from the valley floor is taken into account, this effectively increases the distance to 3 km. This distance is too great for non-car travel and therefore SS1 does not support the Vision.</p> <p>The Sustainability Appraisal states that the provision of cycle paths and walking routes would mitigate the number of car journeys from the site. There are narrow roads in the areas adjoining the Strategic Site SS1 which have on-road parking and this means that the provision of cycle paths and walking routes would not be feasible. This part of the Core Strategy is therefore not Justified.</p>	Reduce the number of houses proposed for SS1 to 100 as proposed in the current Local Plan to reduce the number of car journeys.	Yes, I wish to participate at the oral examination	<p>Save Your Berkhamsted Residents Association is an organisation of 250 paid up members. Its aim is....</p> <p>To represent the interests of residents of Berkhamsted and neighbouring areas with regard to current and future housing developments. In particular the Association will encourage and coordinate responses to development initiatives with the intent of preserving the character of this historic market town and its surrounding countryside.</p> <p>It is important that SYBRA is involved in the oral part of the examination</p>
2114 31	Ms Susan Johnson	Berkhamsted Citizens Association				Strategic Site Shootersway/Durants Lane.	SS1	Table SS1	Objecting	Yes	No	b) Effective	The BCA considers the Core Strategy to SS1 unsound as it is not effective in its infrastructure delivery planning. The 'Principles' section makes no mention of the need for a timetable, additional utilities (principally water and electricity) already stretched by current housing. Its treatment of extra traffic	The 'Principles' section should include a paragraph on the provision of additional utilities (water and electricity) for the new estate, together with a timetable for their installation. The 'Delivery' section should include a paragraph devoted to	No, I do not wish to participate at the oral examination	

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													generation is confined to promoting sustainable transport options and improving junctions. The impact on the town centre, particularly on parking there, is not even mentioned.	the impact of private car traffic on the town centre; and ways to accommodate parking there.		
211503	Mr Colin White	Chilterns Conservation Board				Strategic Site Shootersway/Durants Lane.	SS1	Table SS1	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 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>	Include mention of the proximity to the Chilterns AONB and the need to ensure that the setting of the AONB is protected in the 'principles' section of the text on page 186.	No, I do not wish to participate at the oral examination	

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													<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 8th 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>Strategic allocation 1 for Berkhamsted identifies an area to the west of the town for future growth. Whilst not being within the Chilterns AONB it is likely that because the development is within about 300 metres of the AONB great care would be needed with the treatment of this site. The proximity to the Chilterns AONB and the need</p>			

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													to ensure that the setting of the AONB is protected (and ultimately the AONB is therefore conserved and enhanced) should be specifically mentioned in the 'principles' section of the text on page 186.			
515465	Mr Alan Kemp	Berkhamsted Town Council				Strategic Site Shootersway/Durants Lane.	SS1	Table SS1	Supporting	Yes	Yes		<p>Egerton-Rothesay School is a private school run by a charitable trust and not a community school. Consequently any funding received as consequence of development will depend on the property interest that the school has that is affected by the development scheme and what their proper and justified return for involvement in the scheme should be. This should be dealt with by means of a S106 agreement.</p> <p>1. Page 186, Strategic Sites, Principles section, eighth bullet point. Object</p> <p>2. Unsound No</p> <p>3. Justified No</p> <p>4. Egerton-Rothesay School is a private school run by a charitable trust and not a community school. Consequently any funding received as consequence of development will depend on the property interest that the school has that is affected by the development scheme and what their proper and justified return for involvement in the scheme should be. This should be dealt with by means of a S106 agreement.</p> <p>5. Replace with –The development must secure improved access to the school and relocation of the playing fields .”</p> <p>Representation:</p>	<p>Replace with "The development must secure improved access to the school and relocation of the playing fields ."</p> <p>In the third bullet point delete "and to generate funds for refurbishment of the school".</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>1. Page 186, Strategic Sites, Delivery section, third bullet point. Object</p> <p>2. Unsound No</p> <p>3. Justified No</p> <p>4. Egerton-Rothesay School is a private school run by a charitable trust and not a community school. Consequently any funding received as a consequence of development will depend on the property interest that the school has that is affected by the development scheme and what their proper and justified return for involvement in the scheme should be. This should be dealt with by means of a S106 agreement.</p> <p>5. In the third bullet point delete - . . . and to generate funds for refurbishment of the school.</p>			
625438	Mr Chris Ball		625439	Mr Adam Halford	Bidwells	Strategic Site Shootersway/Durrants Lane.	SS1	Table SS1	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>Reference to "securing additional land" is only stated within Local Allocation Proposal LA4 not within Strategic Site SS1. It is considered that the traffic generation from the 180 homes development at Durrants Lane/Shootersway (SS1) will require similar, if not greater, junction improvements at Shootersway/Kingshill Way to that of the Hanbury's and The Old Orchard development and will therefore require the same provisions as Local Allocations LA4.</p>	<p>References to highway works in relation to Shootersway/Kingshill Way should be revised as thus:</p> <p>"Impact on the local road network mitigated through the promotion of sustainable transport options and funding improvements to the Shootersway/Kingshill Way junction. This will include securing additional land to improve the junction."</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.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)				Local Allocation. Land rear of Hanburys.	Table LA4 Local Allocation. Land rear of Hanburys	Table LA4	Objecting	Yes	No	a) Justified	<p>BRAG submits that DBC's own figures point to 750 homes required to maintain a stable population (see BRAG response to 1.13 (a) and 8.9 Table 1), which would allow the LA4 site (Hanburys) to be removed from</p>	Remove LA4 Local Allocation. Land rear of Hanburys from the Core Strategy.	Yes, I wish to participate at the oral examination	It is important that residents' views are heard when considering planning decisions that will

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													the Core Strategy. Hanburys is also in Green Belt and BRAG maintains that Green Belt should not be compromised.			affect their environment and quality of life.
6099 65		Save Your Berkhamsted Residents Association	6099 63	Mr Alan O'Neill	Save Your Berkhamsted Residents Association	Local Allocation. Land rear of Hanburys.	LA4 and paragraph 21.3	Table LA4	Objecting	Yes	No	a) Justified	The land at Hanburys is Green Belt and represents part of the "Green Lung" that separates Berkhamsted from the A41. Building on this land would effectively join the town to the A41 and remove a vital green corridor for wildlife.	Do not build on Green Belt. Utilise all available Brown field and vacant building sites	Yes, I wish to participate at the oral examination	Save Your Berkhamsted Residents Association is an organisation of 250 paid up members. Its aim is.... To represent the interests of residents of Berkhamsted and neighbouring areas with regard to current and future housing developments. In particular the Association will encourage and coordinate responses to development initiatives with the intent of preserving the character of this historic market town and its surrounding countryside. It is important that SYBRA is involved in the oral part of the examination
2116 60	Mr Garrick Stevens	Berkhamsted Town Council				Local Allocation. Land rear of Hanburys.	Table LA4	Table LA4	Objecting	Yes	No		P 187 Local Allocation - [Hanbury] Object This area should not be developed until improvements have been made at the Shootersway/Kingshill Way		Yes, I wish to participate at the oral examination	I would like to be present in particular when the Berkhamsted Place and Housing

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													junction. Access from the site should not be onto Shootersway.			allocations are discussed.
328864	Mr Danny Bonnett	Transition Town Berkhamstead				Local Allocation. Land rear of Hanburys.	Table SS1	Table LA4	Objecting	Yes	No	c) Consistent with national policy	<p>The principles listed for the development of this site list the following:</p> <p>The impact of the scheme on the local road network will need to be mitigated through promoting sustainable transport options, reinforcing pedestrian / cycle links through the site, and funding improvements to the Shootersway / Kingshill Way and Durrants Lane / High Street junctions.</p> <p>This is inconsistent with national policy because the language is too weak, and it implies a modest mitigation of the business as usual transport situation for a development such as this. As pointed out in our comments on the overall objectives for the strategy, to be consistent with national targets to reduce our greenhouse gas emissions, new developments must be radical in their thinking, they should bring such a positive environmental influence to the surrounding community that they bring DOWN the average (per capita) emissions. With transport this can be achieved by providing sustainable transport choices, funded by the sale of properties in the new development (examples a funding a hydrogen powered round-town bus, with hydrogen created with electricity from a community wind turbine; provision of cycle lanes giving school children safe routes to their schools, not just from the new development, but to other parts of town too; permanently modifying bus routes on a sufficient</p>	<p>The first of the 'principles' set out in the table below should read as follows:</p> <p>Through it's creation, and ongoing occupation, this site shall have a net positive effect on the local environment of the town through a per capita reduction in carbon emissions, in total car journeys, an increase in human health, strengthening of biodiversity, strengthening of local food production, reduction in energy use, reduction of water use and an improvement in community cohesion.</p>	Yes, I wish to participate at the oral examination	TTB believe that the principles of sustainable development have not yet been correctly interpreted when forming this document. We would like the opportunity to expand on the points made above, and to present directly how we see the planning process and development opportunities working to deliver a community that will minimise it's impact on the planet, and whose residents will benefit from a better quality of life.

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													frequency to take people out of their cars; etc). The same principles of impact beyond the dwelling can come from community energy schemes, from energy efficiency as made available to the public through community centres/buildings with an educational objective (like the RES building in Kings Langley), from facilities for local food production, and from water harvesting and storage schemes. It is on this basis that new schemes should proceed through to detailed planning applications. This comment applies specifically to the 2 sites described in this section, and in general to any sites considered for development in Berkhamsted and Dacorum.			
498429	Steve Baker	CPRE - The Hertfordshire Society				Local Allocation. Land rear of Hanburys.	LA4	Table LA4	Objecting	No	No		The Core Strategy is unsound because it is not justified nor effective because it does not protect the character of existing neighbourhoods; it does not place development in an area with good transport links and accessibility; it would result in existing Green Belt being unnecessarily lost; it does not conserve or enhance landscape or habitats; and the 60 new dwellings proposed would adversely impact on views across the valleys to both north and south, all contrary to specific policies and stated intentions in the Core Strategy.	LA4 should be deleted from the text and Figure 23.	Yes, I wish to participate at the oral examination	
625438	Mr Chris Ball		625439	Mr Adam Halford	Bidwells	Local Allocation. Land rear of Hanburys.	LA4	Table LA4	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy. The wording of LA4 does not explicitly make reference to The Old Orchard, and the Council's response to this following the November 2010-Jan 2011	We suggest the following rewording: All references to Hanbury's to be replaced with "Hanbury's and The Old Orchard" (including Table 9). All references relating to the capacity of the Hanbury's and	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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													<p>consultation stated that it was "logical in planning terms".</p> <p>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'.</p> <p>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.</p> <p>The Berkhamsted Place Strategy, Local Allocation Proposal LA4 principles states that the redevelopment will be used for 'funding improvements to the Shootersway/Kingshill Way junction. This will include securing additional land to improve the junction within the existing boundary.'</p> <p>NB: We are not sure that the existing wording makes sense and therefore we suggest deleting 'within the existing boundary' from the end of the sentence above.</p> <p>The highway improvements to the Shootersway/Kingshill Way junction have also been identified within Strategic Site Proposal SS1 located at Durrants Lane/Shootersway. This Strategic Site for 180 dwellings and school and leisure development has been clearly stated for delivery by 201/15. This site is entirely</p>	<p>The Old Orchard joint site of Loal Allocations Proposal LA4 to be replaced with "In the region of 65 to 75 new homes."</p> <p>Table 9 on page 107 to refer to Hanbury's and The Old Orchard and under the "number of homes" to state 65 to 75.</p> <p>To make the Plan 'effective' through flexibility to deal with changing circumstances and site and market conditions. To reflect the judgement of the issues & Options Paper dated November 2008, in the absence of new or contrary evidence at this time for a reduction.</p> <p>Add further delivery detail to Allocation Proposal LA4:</p> <p>"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 SS1".</p> <p>In relation to Strategic Site Proposal SS1 and Local Allocation Proposal LA4 references to highway works in relation to Shootersway/Kingshill Way to be revised thus:</p> <p>"Impact on the local road network mitigated through the promotion of sustainable transport options and funding improvements to the Shootersway/Kingsway Way junction. This will include securing additional land to improve the junction."</p>		important that the site is represented at the examination.

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													<p>independent of the Local Allocation Proposal LA4. There is clearly inconsistency between the wordings of the two Core Strategy Proposals.</p> <p>Reference to –securing additional land is only stated within Local Allocation Proposal LA4 not within Strategic Site SS1. It is considered that the traffic generation from the 180 homes development at Durrants Lane/Shootersway will require similar, if not greater, junction improvements at Shootersway/Kingshill Way to that of the Hanbury's development and will therefore require the same provisions as Local Allocation LA4.</p> <p>We propose amended wording in respect of Strategic Site Proposal SS1 at the end of this representation, which would overcome our objection.</p>	To insert consistency between policies and proposals within the DPD.		
627374		Brightman & Ball	627371	Mr Andrew Wilkins	Lone Start Land Ltd	Local Allocation. Land rear of Hanburys.	LA4	Table LA4	Supporting	Yes	No	b) Effective	<p>The Core Strategy is unsound because it is not justified and 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</p>	<p>Further delivery details should be added to the site proposal LA4 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 SS1 or the site should be re-categorised as an additional strategic site proposal for Berkhamsted.</p>		<p>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.</p>

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													housing targets of the Core 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.			
603361	AN Champion						Figure 23	Figure 23	Supporting	Yes	Yes		<p>The retention of land south of Berkhamsted within the Green Belt is supported. The exclusion of a local allocation on this land is also supported.</p> <p>The location of the proposed South Berkhamsted development is within Green Belt and fails to meet the policy aims of the Plan for example "National guidance sets out the Government's aim of protecting the countryside" and "New development must maintain the distinctive physical and historic character of the town and its valley setting, and will not be supported where it has an adverse impact on the sensitive open valley sides and ridge top locations".</p> <p>Having contacted David Gauke MP he confirms that he too is "concerned about this proposal" and specifically refers to infrastructure constraints.</p> <p>South Berkhamsted should be rejected.</p>		No, I do not wish to participate at the oral examination	
489024	Mr Stephen Proudfoot						Figure 23	Figure 23	Objecting	Yes	No	a) Justified	<p>SS1 Strategic Site Shootersway/Durrants Lane - The classification of this site as a Semi-Urban Zone is not consistent with the surrounding area and its location.</p>	<p>SS1 Strategic Site Shootersway/Durrants Lane should be re classified as a Peripheral Zone.</p> <p>As illustrated in fig 1.2-site location plan - Land at Durrants Lane and Shootersway Berkhamsted Framework Masterplan revised October 2011</p>	Yes, I wish to participate at the oral examination	Having lived in Berkhamsted all my life and the apparent lack of weight given to local residents opinions during the consultation process I would like to be able

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														the site is dissected by a 2km radius from the centre of the town. The site is on the peripheral outskirts of Berkhamsted and will form the peripheral boundary of the town and should therefore been classified as such.		express my concerns.
610662	Mr Antony Harbidge	Berkhamsted Residents Action Group (BRAG)					Figure 23	Figure 23	Supporting	Yes	Yes		BRAG supports the maintenance of the Berkhamsted settlement boundary and considers all additional housing should be within those boundaries.		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.
494332	mr edwin cuthbert						Vision Diagram	Figure 23	Objecting	Yes	No	a) Justified	The proposed Strategic Site SS1 has been classified as a Semi Urban Zone which is inconsistent with the other land along Shootersway classified as a Peripheral Zone. In so doing, it allows for a much higher density housing level on this 'ringfenced' site which is contrary to the Vision for Berkhamsted to preserve and protect sensitive ridge top locations.		No, I do not wish to participate at the oral examination	
221859	Mr Nick Hanling						Figure 23	Figure 23	Objecting	Yes	No	a) Justified	SS1 Strategic Site Shootersway/Durrants Lane, Berkhamsted - The classification of this site as a Semi-Urban Zone is not consistent with the surrounding area and its location.	SS1 Strategic Site Shootersway/Durrants Lane, Berkhamsted should be reclassified as a Peripheral Zone. The site consists primarily of fields and wooded areas. The majority of the land bordering this site is either classified as Peripheral Zone or is Green Belt. Site SS1 should therefore be classified as Peripheral Zone. As illustrated in fig 1.2-site location plan - Land at Durrants Lane and Shootersway Berkhamsted Framework Masterplan revised October 2011, the site is bisected by a 2km radius from the centre of the town. The site is clearly shown as being on the peripheral outskirts of Berkhamsted and will form the peripheral boundary of	Yes, I wish to participate at the oral examination	This point has been raised with the Borough Council in previous consultations, but subsequent versions of the core strategy have not sought to explain the rationale for classifying this site as semi-urban.

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														the town and should therefore be classified as such.		
496443		Grand Union Investments	372732	Ms Jane Barnett	Savills		Figure 23	Figure 23	Objecting	No	No	a) Justified	<p>It is not Justified, Effective or Consistent with national policy.</p> <p>It is concluded that the current Core Strategy is not justified in that it does not reflect the conclusions of the evidence base, which has in turn undermined the effectiveness of the supporting SA/SEA.</p> <p>The current identification of one "Strategic Site" and one "Local Allocation" at Berkhamsted is not considered to represent the most appropriate strategy when considered against the reasonable alternatives, the most sustainable of which is considered to relate to the development proposals at Land South of Berkhamsted.</p> <p>The Strategic Objectives set out in the draft CS are therefore considered not to meet the Council's Vision for the town as there simply is not enough housing land identified to meet the town's local needs and demands.</p> <p>The "Berkhamsted Place Strategy" is not consistent with national policy contained in PPS1, PPS3, PPS12 or the NPPF, principally due to the insufficient housing targets identified for the town to meet its local housing needs and natural household growth projections. This Chapter of the CS</p> <p>does not identify an assessment of alternatives for considering sustainable locations to accommodate some of this future development growth.</p> <p>The overall CS's Vision objectives</p>	<p>Recommended Changes to Figure 23:</p> <p>(See full representation attached)</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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													(and indeed the CS's Common Local Objectives set out at paragraph 19.2 of the pre-Submission CS in relation to Place Strategies) will all be achieved by identifying South Berkhamsted as a Local Allocation for development purposes and through the provision of new and improved social and transport infrastructure to the benefit of the town and wider area. GUI provides a solution to a currently unsound Chapter of the Plan based on a robust assessment of development proposals at Land South of Berkhamsted in the form of a sustainable urban extension. It is therefore recommended that the site is recognised as such in the form of a CS Local Allocation under the Berkhamsted Chapter.			
502874	Mr Chris Bearton	Hertfordshire County Council				Figure 23	Figure 23	Figure 23	Objecting	No	No		Berkhamsted Castle should be marked on fig. 23. It was the site of the surrender of the Anglo-Saxon army to King William in 1066 and is the most important historic feature of the town.			
211503	Mr Colin White	Chilterns Conservation Board				Figure 23	Figure 23	Figure 23	Objecting	Yes	No	b) Effective	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,	Include the AONB boundary on Figure 23.	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 8th 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>Figure 23 could usefully be amended to include the AONB boundary as this is very important to the setting of Berkhamsted.</p>			
610050	mrs. maria potter					Tring Place Strategy	22	22	Objecting	Yes	No	a) Justified	<p><i>My family lives in Okeley Lane and Highfield Road and we certainly were not aware of this. We all knew that there were several proposed sites within Tring under consultation but I'm sure we are not the only ones to be surprised to know that all other sites have been dropped and only the Field signalled on the plans is being considered.</i></p> <p><i>I spoke to one of the Strategic Planning Officers who when asked why the local residents had not been informed of these plans and the fact the plans for other sites had been dropped, told me that they had consulted with the PUBLIC, there were council meetings at Dacorum and this was discussed with the PUBLIC, and we would be able to give our comments but this was the site being marked for</i></p>	<p>The Council do not seem to really listen or consult with those who will indeed be directly affected by these proposals and do seem to come across as trying to pass this as quickly and as quietly as possible in the hope that no objections will be put forward. I am very passionate about this and feel that our voice should be heard loud and clear as this will affect and have a huge impact on our children's futures and generations to come and also we do have a right to be heard under the new Localism Act.</p>	<p>Yes, I wish to participate at the oral examination</p>	

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													<p><i>the Core Strategy Plan.</i></p> <p><i>I also raised the fact that I thought the Residents living within the closest area, i.e. Okeley Lane, Buckingham Road, Highfield Road, Beaconsfield Road, Miswell Lane, really all the properties situated between Icknield Way and Aylesbury Road, from Donkey Lane onwards, should have at least been made more aware that these meetings were taking place as not everyone has easy access to this. The Officer once again said they had consulted with the PUBLIC and this was the site most suitable to the proposals.</i></p> <p>Only a few weeks ago the water pressure in our area dropped dramatically due to problems with the pumping station, do we really need even more pressure on a service already under pressure?</p> <p>I do not know about you but I would like to be informed by the Council if something as dramatic as:</p> <p>the loss of another Green Area in our Town, used by many dog walkers, joggers, walkers and the 3 times a Year Horse Jumping show</p> <p>the building of 150 HOUSES of which 40% will be AFFORDABLE, which by the way will instantly reduce the Market Value of all the properties within the roads mentioned above by up to 40%, and if the travellers site does sneak in, then the devaluation will even be higher and make a lot of the</p>			

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													<p>houses impossible to sell, house insurance and car insurance will also instantly go up,</p> <p>our local schools which are already struggling with budgets, becoming even more subscribed to the point that our children will then not have a place in Primary or Secondary School in Tring and have to be placed in schools in Berkhamstead which is what already happens when you are refused a place in Tring School, for example,</p> <p>not being able to get a GP or Nurse appointment in our local surgery due to the over load another 150 HOUSES will bring to their service when they are already covering surrounding villages</p> <p>our class sizes in our local schools increasing to such a level that will affect not only the quality of education but also make the staff under more pressure bearing in mind all the budget cuts our local council and county council have made to not only the provision of teaching and teaching support staff but also to the up running of the schools. Those of us who have children at Tring school are very much aware that even the Head Teacher there is asking parents to contribute a regular payment for the upkeep and ensuring the Heating System does not break down and the school be shut because she no longer has the funds available and</p>			

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													<p>the Council will not replace the boilers because there is no money</p> <p>birds of prey as beautiful as the endangered RED KITE</p> <p>, which we all have seen flying above our houses and have been nesting in the trees of the fields they are proposing to build on, foxes, badgers, hedgehoggs and other wildlife as well, and the lovely horses which are permanently in the field as well,</p> <p><i>We could just go on and on adding to this list and I'm sure you will all think of many other issues relevant. How many of us will also then be put into forced Negative Equity?</i></p> <p><i>Friends who live near one of the other proposed sites (Cow Lane) demanded a meeting with the Council and Local Residents</i></p> <p><i>where they were able to strongly voice their opposition and it obviously worked as their proposed site was then dropped by the Strategic Planning. Why is it that they deserved to be heard and we don't?</i></p> <p><i>Considering the fact that our country is in recession and the Euro is also in a situation that might drag the UK further into recession, where is the money going to come from to develop and ensure that the infrastructure in Tring will be able to acomodate all these plans? There already is lots of empty properties for Rent in Tring and due to the current economic crisis also lots of properties for sale which are not selling due to the economic</i></p>			

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													<p><i>worries, how can you then justify building further in a small town/village like Tring?</i></p> <p>We could just go on and on adding to this list and I'm sure you will all think of many other issues relevant. How many of us will also then be put into forced Negative Equity?</p>			
610556	Mr Peter Lightowler					Tring Place Strategy	Tring Place Strategy	22	Objecting	No	No	a) Justified	<p>Houses should not be built on Greenbelt Land. The proposed area is already jammed with too many vehicles especially the Miswell Lane approach to Tring. The risk is gridlock.</p> <p>Tring School is already too large. Having worked there for 10 years I know they have insufficient space for the present number of pupils and there is a maximum number in a school whereby the school functions efficiently. Their need is for buildings, not pupils or playing fields - especially remote ones. The risk is the deterioration of a good school.</p>	<p>Any new housing should be on brownfill nor greenfill sites. Infrastructure increase needs to be carefully planned to ensure already crowded roads and town center do not just become more crowded. Schools, surgeries, local amenities should be planned, not just present ones swamped.</p> <p>The proposed housing site is also linked with a proposed traveller site. You can't have both for obvious reasons.</p>	No, I do not wish to participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Tring Place Strategy	Tring Place Strategy	22	Supporting	Yes	Yes		<p>The following comments apply in respect of water supply. The levels of development proposed will be supportable in respect of the existing local water supply network, however it is possible that the increase in demand for water arising from the level of development proposed require a wider reinforcement to enable water to be transferred from Aston Clinton to the Tring area. This would require a major upgrade to the water mains supplying Aylesbury.</p> <p>It will therefore be necessary for development proposals to be assessed / modelled in respect of their impact on water supply infrastructure, once the precise scale and location of development is known.</p>	N/A	No, I do not wish to participate at the oral examination	

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619517	Mr Robert Ian Gomarsall	Tring Bowling Club				Tring Place Strategy	Tring Place Strategy	22	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.	<p>Paragraph 22.2 (context)</p> <p>Add "The town supports a thriving sporting community."</p> <p>(I agree this addition is fully justified on the facts and provides an important corrective to help balance the statement at paragraph 4.6 that "the range of social, leisure and cultural facilities...are currently quite low for the size of population.")</p> <p>Paragraph 22.2 (The Vision)</p> <p>Change "with improved outdoor leisure facilities" to "with improved outdoor leisure facilities meeting the demand from both the local community and local schools."</p> <p>(Please see also comments at paragraph 15 above.)</p> <p>Paragraph 22.3 (Delivering the Vision)</p> <p>Delete "including playing fields".</p> <p>Local Allocation</p> <p>In proposals box change "playing fields and open space" to "open space".</p> <p>New paragraph 22.10 (Delivering the Vision)</p> <p>"A new or completely refurbished indoor sports facility (including a swimming pool and a full size outdoor astro-turf playing area) will be delivered to replace the existing Sports Centre facilities managed by Sportspace on</p>	No, I do not wish to participate at the oral examination	

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														<p>Mortimer Hill, which are at the end of their serviceable life."</p> <p>New paragraph 22.11 (Delivering the Vision)</p> <p>"New playing fields, primarily for community use, will be provided. The location of these playing fields will be identified through the Site Allocations DPD."</p>		
619543	Mr Patrick Barr	Tring Hockey Club				Tring Place Strategy	Section 22	22	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>Paragraph 22.2 (context)</p> <p>Add "The town supports a thriving sporting community."</p> <p>(I agree this addition is fully justified on the facts and provides an important corrective to help balance the statement at paragraph 4.6 that "the range of social, leisure and cultural facilities...are currently quite low for the size of population.")</p> <p>Paragraph 22.2 (The Vision)</p> <p>Change "with improved outdoor leisure facilities" to "with improved outdoor leisure facilities meeting the demand from both the local community and local schools."</p> <p>(Please see also comments at paragraph 15 above.)</p> <p>Paragraph 22.3 (Delivering the Vision)</p> <p>Delete "including playing fields".</p> <p>Local Allocation</p>	No, I do not wish to participate at the oral examination	

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														<p>In proposals box change "playing fields and open space" to "open space".</p> <p>New paragraph 22.10 (Delivering the Vision)</p> <p>"A new or completely refurbished indoor sports facility (including a swimming pool and a full size outdoor astro-turf playing area) will be delivered to replace the existing Sports Centre facilities managed by Sportspace on Mortimer Hill, which are at the end of their serviceable life."</p> <p>New paragraph 22.11 (Delivering the Vision)</p> <p>"New playing fields, primarily for community use, will be provided. The location of these playing fields will be identified through the Site Allocations DPD."</p>		
619551	Mr Chris Roberts	Tring Swimming Club				Tring Place Strategy	Section 22	22	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>Paragraph 22.2 (Context)</p> <p><i>Add</i> "The town supports a thriving sporting community."</p> <p>(I agree this addition is fully justified on the facts and provides an important corrective to help balance the statement at paragraph 4.6 that "the range of social, leisure and cultural facilities...are currently quite low for the size of population.")</p> <p>Paragraph 22.2 (The Vision)</p> <p><i>Change</i> "with improved outdoor leisure facilities" to "with improved outdoor leisure facilities meeting the demand from both the local</p>	No, I do not wish to participate at the oral examination	

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														community and local schools." (Please see also comments at paragraph 15 above.) Paragraph 22.3 (Delivering the Vision) <i>Delete</i> "including playing fields". Local Allocation In Proposals box, <i>change</i> "playing fields and open space" to "open space". New Paragraph 22.10 (Delivering the Vision) "A new or completely refurbished indoor sports facility (including a swimming pool and a full size outdoor astro-turf playing area) will be delivered to replace the existing Sports Centre facilities managed by Sportspace on Mortimer Hill, which are at the end of their serviceable life." New Paragraph 22.11 (Delivering the Vision) "New playing fields, primarily for community use, will be provided. The location of these playing fields will be identified through the Site Allocations DPD."		
489516	Mr Christopher Allen	Tring Sports Forum				Tring Place Strategy	Section 22 Tring Place Strategy	22	Objecting	Yes	No		The process of paring down and refining the Core Strategy to its pre-submission form has, in the view of Tring Sports Forum ("TSF"), left Tring with a Place Strategy that flies in the face of the facts and fails to address Tring's sport and leisure needs adequately or appropriately. It is not supported by "a robust and credible evidence base", and to this	We would suggest the following amendments/additions to paragraph 22 of the Tring Place Strategy in order to address the perceived shortcomings mentioned above.	Yes, I wish to participate at the oral examination	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

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													<p>extent, the Pre-Submission Core Strategy is unsound because it is not "justified" under the terms of PPS12.</p> <p>An outsider reading the Tring Place Strategy could be forgiven for thinking that sport and leisure is of minimal importance in the town. The Vision envisages "improved outdoor leisure facilities" almost as an afterthought. Delivering the Vision makes mention of "new open space, including playing fields" but only as part of a Local Allocation (LAS) including approximately 150 new homes on the western edge of Tring. It also provides for "new detached playing fields" (at a site not yet identified) but conditional on Tring School being extended by up to two forms of entry.</p> <p>Responding to TSF's request that the Tring Place Strategy be reassessed, Dacorum BC asserts in the Report of Consultation, Volume 6, Annex A that "existing technical work does not indicate any additional and exceptional need for additional playing facilities in the town".</p> <p>Commenting at paragraph 3.15 of the Report of Consultation, Volume 6, Dacorum BC adds that: "some organisations such as Tring Sports Forum supported plans for additional playing fields at Tring, but individuals opposed this. They said that Tring had large areas of</p>	<p>Paragraph 22.2 (Context)</p> <p><i>Add</i> "The town supports a thriving sporting community."</p> <p>(We feel this addition is fully justified on the facts and provides an important corrective to help balance the statement at paragraph 4.6 that "the range of social, leisure and cultural facilities...are currently quite low for the size of population.")</p> <p>Paragraph 22.2 (The Vision)</p> <p><i>Change</i> "with improved outdoor leisure facilities" to "with improved outdoor leisure facilities meeting the demand from both the local community and local schools."</p> <p>(Please see also our comments at paragraph 15 above.)</p> <p>Paragraph 22.3 (Delivering the Vision)</p> <p><i>Delete</i> "including playing fields".</p>		the forum to attend the Examination hearings, where appropriate.

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													<p>underutilised sporting facilities..."</p> <p>The reality is significantly different.</p> <p>A survey undertaken by TSF in 2006 of 13 of the sports clubs in the town demonstrated a need for 16 additional outdoor pitches/courts (for football, rugby, hockey, cricket and tennis), 4 new indoor pitches/courts (for hockey, cricket and tennis), extra changing rooms and more training facilities. Playing member numbers at the clubs surveyed totalled over 3,100 and are projected to rise to just under 4,000 (an increase of over 27%) by 2016. Current trends - for example, numbers for junior/mini rugby have grown from 300 to 570 over the past five years - suggest that the projections will be comfortably met, if not exceeded. Furthermore, the survey indicated that the clubs' facilities were already in use, on average, for 5.3 hours per day and 4.7 days per week.</p> <p>The above figures underpin the following comment TSF made in response to the Draft Core Strategy: We are surprised that there is no mention of the thriving sporting community in Tring; it is home to the leading clubs in Dacorum for rugby, cricket, football, hockey and squash." That comment was completely ignored (and not even acknowledged in the Report of Consultation, Volume 6, Annex A).</p>	<p>Local Allocation</p> <p>In Proposals box, <i>change</i> "playing fields and open space" to "open space".</p> <p><i>New Paragraph 22.10 (Delivering the Vision)</i></p> <p>"A new or completely refurbished indoor sports facility (including a swimming pool and a full size outdoor astro-turf playing area) will be delivered to replace the existing.</p> <p>Sports Centre facilities managed by SportSpace on Mortimer Hill, which are at the end of their serviceable life."</p> <p><i>New Paragraph 22.11 (Delivering the Vision)</i></p> <p>New playing fields, primarily for community use, will be provided."</p> <p>(We strongly believe that the location of these facilities should be identified in the Core Strategy, rather than in a subsequent DPD.)</p>		

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													<p>We would also challenge the negative conclusions drawn from Dacorum BC's "existing technical work". TSF represents 17 sports clubs in the town with a combined total membership of over 4000. It has submitted its own technical evidence, setting out details of current playing fields and participation levels in the Tring area, which is markedly at odds with that being used by Dacorum BC. Please see too our comments at paragraph 15 (Meeting Community Needs) of the Pre-Submission Core Strategy regarding the unsound evidence base used for Tring.</p> <p>Again, we must firmly scotch the idea that Tring has "large areas of underutilised sporting facilities". We believe this to be the uninformed comment of one individual, which has been given undue and unjustified prominence by Dacorum BC - especially as it is disproved by the evidence of the TSF survey mentioned above.</p> <p>It is unfortunate that Dacorum BC's express reference to Leisure and Sports Facilities at paragraph 1.8 of the emerging Spatial Strategy for the Town of Tring document dated June 2009 (in particular, recognition that the sports centre managed by SportSpace on Mortimer Hill "needs new investment" and that "outdoor sports facilities are heavily used") has been excised from all subsequent Core Strategy documents relating to Tring. The absence of any reference in the</p>			

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													<p>Tring Place Strategy to a reconstructed or replacement sports centre is worrying - and contradicts the Borough's vision of self-sufficiency for Tring, Berkhamsted and the large villages set out at paragraph 5.1.</p> <p>Finally, we would contend that the proposal at paragraph 22.3 to locate playing fields at Icknield Way on the western edge of Tring is not the most appropriate option. We would regard the proposal as even less appropriate should new detached playing fields be required by Tring School and this proves to be the location for them. The proposed site is almost two miles from the centre of the town and the school, and therefore runs counter to the Sustainable Development Strategy on accessibility and the overall need to reduce travel by car set out at paragraph 6.2; in addition, there could be very real concerns about getting school pupils safely there by foot.</p> <p>Our opinion is supported by the following comments by Hells CC, summarised by Dacorum BC in the Report of Consultation, Volume 6, Annex A: "Choosing Icknield Way site is at odds with the vision for Tring for improving accessibility to services and facilities..."</p> <p>For these reasons, the proposed location for the playing fields is not "the most appropriate strategy when considered against the reasonable alternatives" and therefore again</p>			

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													<p>fails the "soundness" tests of PPS12.</p> <p>Furthermore, the Core Strategy proposes that a site for the detached playing fields required to facilitate the expansion of Tring School will be identified through a subsequent Site AllocationsDPD. This approach is not considered to be sound, since the proposal for new housing in Tring, any necessary expansion of the school and the provision of detached playing fields are all closely related and cut to the heart of the deliverability of the spatial strategy for Tring. The Core Strategy should take the opportunity to provide for the much needed open space facilities in Tring "on the back or the provision of any detached playing fields for Tring School, and it is considered that the land at Dunsley Farm would be the ideal site. Although it is located within the Green Belt, such use would be "appropriate" under the terms of PPG2.</p> <p>It is interesting to note that Dacorum BC, responding to Herts CC's objections to the Local Allocation west of Tring, observes: "If required, new playing provision could still be made on the Dunsley Farm site, since such use is acceptable within the Green Belt. Agreed that further discussions with Herts CC can take place as part of the Site Allocations DPD production".</p> <p>If a site on the Green Belt land to</p>			

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													the east of Tring were to become deliverable we would strongly favour such a location - as, we believe, a majority of the local community would. TSF's "Have Your Say" survey of over 135 Tring residents which took place on Tring High Street in December 2009 at the Tring Christmas Festival established that more than 90% of the sample agreed that sports clubs should be allowed to extend their facilities into Green Belt land.			
502874	Mr Chris Bearton	Hertfordshire County Council				Tring Place Strategy	Tring Place Strategy	22	Objecting	No	No		Tring Place Strategy The following statement should be added to Delivering the Vision: Several areas of the settlement have been identified as possessing potential for the presence of heritage assets with archaeological interest . Proposals will be subject to an appropriate assessment of heritage assets, and any necessary mitigation measures. Reasons: Several areas of Tring have been identified as possessing high potential for the presence of heritage assets of archaeological interest, particularly the area of the medieval core. Two major Roman roads meet within the settlement.			
620486	Mrs Joan Desborough	Tring Lawn Tennis Club				Tring Place Strategy	Section 22	22	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	Paragraph 22.2 (Context) <i>Add "The town supports a thriving sporting community."</i> (I agree this addition is fully justified on the facts and provides	No, I do not wish to participate at the oral examination	

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													<p>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>an important corrective to help balance the statement at paragraph 4.6 that "the range of social, leisure and cultural facilities...are currently quite low for the size of population.")</p> <p>Paragraph 22.2 (The Vision)</p> <p><i>Change</i> "with improved outdoor leisure facilities" to "with improved outdoor leisure facilities meeting the demand from both the local community and local schools."</p> <p>(Please see also comments at paragraph 15 above.)</p> <p>Paragraph 22.3 (Delivering the Vision)</p> <p><i>Delete</i> "including playing fields".</p> <p>Local Allocation</p> <p>In Proposals box, <i>change</i> "playing fields and open space" to "open space".</p> <p><i>New Paragraph 22.10</i> (Delivering the Vision)</p> <p>"A new or completely refurbished indoor sports facility (including a swimming pool and a full size outdoor astro-turf playing area) will be delivered to replace the existing Sports Centre facilities managed by Sportspace on Mortimer Hill, which are at the end of their serviceable life."</p> <p><i>New Paragraph 22.11</i> (Delivering the Vision)</p> <p>"New playing fields, primarily for</p>		

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														community use, will be provided. The location of these playing fields will be identified through the Site Allocations DPD."		
625872		Andrew Grout				Tring Place Strategy	Section 22	22	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.	<p>Paragraph 22.2 (Context)</p> <p><i>Add "The town supports a thriving sporting community."</i></p> <p>(I agree this addition is fully justified on the facts and provides an important corrective help balance the statement at paragraph 4.6 that "the range of social, leisure and cultural facilities...are currently quite low for the size of population.")</p> <p>Paragraph 22.2 (The Vision)</p> <p>Change "with improved outdoor leisure facilities" to "with improved outdoor leisure facilities meeting the demand from both the local community and local schools."</p> <p>(Please also see comments at paragraph 15 above)</p> <p>Paragraph 22.3 (Delivering the Vision)</p> <p><i>Delete "including playing fields".</i></p> <p>Local Allocation</p> <p>In Proposals box, change "playing fields and open space" to "open space", New paragraph 22.10 (Delivering the Vision)</p> <p>"A new or completely refurbished indoor sports facility (including a swimming pool and a full size outdoor astro-turf playing area) will</p>	No, I do not wish to participate at the oral examination	

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														be delivered to replace the existing Sports Centre facilities managed by Sportspace on Mortimer Hill, which are at the end of their serviceable life. New Paragraph 22.11 (Delivering the Vision) "New playing fields, primarily for community use, will be provided. The location of these playing fields will be identified through the Site Allocations DPD.		
626341	Ms Vivienne Bryan	Tring TLC				Tring Place Strategy	Section 22	22	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.	Paragraph 22.2 (Context) <i>Add</i> "The town supports a thriving sporting community." (I agree this addition is fully justified on the facts and provides an important corrective to help balance the statement at paragraph 4.6 that "the range of social, leisure and cultural facilities...are currently quite low for the size of population.") Paragraph 22.2 (The Vision) <i>Change</i> "with improved outdoor leisure facilities" to "with improved outdoor leisure facilities meeting the demand from both the local community and local schools." (Please see also comments at	No, I do not wish to participate at the oral examination	

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														<p>paragraph 15 above.)</p> <p>Paragraph 22.3 (Delivering the Vision)</p> <p>Delete "including playing fields".</p> <p>Local Allocation</p> <p>In Proposals box, <i>change</i> "playing fields and open space" to "open space".</p> <p>New Paragraph 22.10 (Delivering the Vision)</p> <p>"A new or completely refurbished indoor sports facility (including a swimming pool and a full size outdoor astro-turf playing area) will be delivered to replace the existing Sports Centre facilities managed by Sportspace on Mortimer Hill, which are at the end of their serviceable life."</p> <p>New Paragraph 22.11 (Delivering the Vision)</p> <p>"New playing fields, primarily for community use, will be provided. The location of these playing fields will be identified through the Site Allocations DPD."</p>		
366491	Mr Brian Worrell					Paragraph	Local Objectives	22.2	Objecting	Yes	No	b) Effective	Tring has an evidence based shortage of sports facilities. Yet there is no local objective to correct this apart from delivering new detached playing fields for Tring School. Not should have been taken of the Tring Sports Forum work on what is required, particularly since another 480 homes are to provided.	I suggest an additional bullet point is added which states 'Provide new and improved sport and leisure facilities'		
211055	Mr Matthew	Hertfordshire County Council				Paragraph	Local Objectives	22.2	Objecting	No	No		The comments made in relation to Paragraph 1.13 (b) are repeated. It is misleading to state that Tring		Yes, I wish to participate	It is considered that it would be helpful to DBC if

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	Wood												<p>School will be extended by up to 2 forms of entry and that new detached playing fields will be delivered. However, Children's Services latest forecasts suggest that there will be a need for expansion, but the reference within the CS would be better if it were less emphatic.</p> <p>The third bullet point local objective on page 189 of the CS would be better expressed/reworded to state;</p> <p>Make policy provision for the expansion of Tring School by 2 forms of entry and provision of detached playing fields in the event they are required.</p>		at the oral examination	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.
630502	Mr Richard Scott					Paragraph	Local Objectives	22.2	Objecting	Yes	No	c) Consistent with national policy	The final bullet point under 'local objectives for Tring' see. To 'maintain the current level of employment provision'. Given that table 8 at page 106 indicates that the town should accommodate a further 480 dwellings to 2031, with an increase in population of perhaps 1,150 then land should be allocated.	Change the final bullet point under local objectives to 'Increase the current level of employment provision to reduce the need for out commuting'. In addition land should be allocated for employment development in the town to help create a balanced community.	No, I do not wish to participate at the oral examination	

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													For employment use to reduce commuting. National policy and the third bullet point of the strategic objectives (page 51) is to reduce the need to travel. Maintaining current levels of employment. Provision hill run counter to this objective and the creation of a sustainable community.			
610088	Mr Martin Hicks	HBRC					Tring Vision	Statement Vision 5	Objecting	No	b) Effective		I consider that, as advised previously: the Vision should also include recognising the 'farming heritage of the countryside around Tring'; and The Delivery should include 'the maintenance of viable farming'. Without these, the nature of the towns green hinterland desired in the vision cannot be achieved. It is otherwise likely to degrade into horse paddocks, redundant land or speculative development parcels, as parts already are.	The Vision should reflect the farming heritage which currently characterises much of the countryside around Tring, and therefore the character of the Market Town.	No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board					Tring Vision Statement	Statement Vision 5	Objecting	Yes	No	b) Effective	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	Delete 'retained' in the first paragraph of the vision and replace with 'conserved' and make reference to the proximity of the AONB to the town.	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 8th 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 Vision for Tring should be amended to reflect the fact that the Chilterns AONB should be conserved and enhanced. Therefore, delete 'retained' in the first paragraph of the vision and replace with 'conserved' and make reference to the proximity of the AONB to the town in order to better reflect the National Parks and Access to the Countryside Act 1949, the Countryside and Rights of Way Act 2000 and Planning Policy Statement 7.</p>			
610552	Miss Julie Stefan					Paragraph	22.3	22.3	Objecting	Yes	No	b) Effective	<p>The proposal for 480 new homes is unsound because the services in Tring will not be able to cope. Please see comments on paragraph 22.4 re why we do not have sufficient provision at infant, junior and secondary schools.</p> <p>We only have one main Dr's surgery in Tring with a huge amount of patients already registered. It is extremely difficult already to get an appointment at the Dr's surgery and often you are unable to get an appointment for over 48 hours. This is already an unacceptable wait and with an additional 480 homes this waiting time would increase</p>	<p>To make the core strategy sound the following would have to be done-</p> <p>Additional infant and junior school places to include long term funding for building and teaching staff.</p> <p>Additonal seconday school places to include long term funding for building and teaching staff. Detached playing fields are not an option. Serious concerns over whether the growth of Tring school that is planned is sustainable.</p> <p>Another Dr's surgery with a</p>	No, I do not wish to participate at the oral examination	

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													<p>significantly.</p> <p>There is also the same issue with dental surgeries with very few if any NHS places available for patients. Your proposal includes provision for affordable housing and this would mean an increased demand for dental services especially NHS places. It is already extremely difficult to get appointments and this difficulty would increase further.</p> <p>The local supermarket, Tesco is of limited size and often does not have enough stock for the current population, this increase would have a huge impact on supplies for the locality.</p> <p>Water supplies in Tring and the surrounding areas have been in short supply for the last few years even though we have 3 reservoirs in the locality. The additional strain that 480 houses would place on the water supply may mean that homes are constantly on a water shortage.</p> <p>Re the site allocation on the Western side of Tring - this is Green Belt land and therefore should be protected. This is already a strong long term Green Belt Boundary and does not need to be altered. It is surrounded by an Area of Outstanding Natural Beauty and this development would go to the boundaries of this land. The land is currently in use as grazing for horses and also the Tring and District Horse Shows hold approximately 4 shows per year on this land. There is a footpath across this land which is in frequent use and would have to be maintained. There is an abundance of wildlife in these fields, including badger sets and red kites. By developing this</p>	<p>number of Dr's to improve patient care and reduce waiting times for appointments and services.</p> <p>Increased Dental provision, especially NHS to improve patient care and reduce waiting times for appointments and services.</p> <p>An additional supermarket or increased size of the current Tesco.</p> <p>The water supply would remain a concern and I cannot propose a resolution to this.</p> <p>Re the site on the Western side of Tring there should be consideration of other sites in other parts of the town that are not Green Belt land, do not have a current use and would not disrupt wildlife.</p> <p>Re vehicular access see above point. There are other sites in Tring which would be more accessible for a large development and would have less impact on the already established neighbouring estates.</p> <p>The industrial site proposal is unsound and there is no demand for it and so is not necessary at this present time.</p> <p>Increased leisure facilities for young people for during the day and at night time.</p>		

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610554	Mr Steve Doughty					Paragraph	22.3	22.3	Objecting	Yes	No	b) Effective	<p>The proposal for 480 new homes is unsound because the services in Tring will not be able to cope. Please see comments on paragraph 22.4 re why we do not have sufficient provision at infant, junior and secondary schools.</p> <p>We only have one main Dr's surgery in Tring with a huge amount of patients already registered. It is extremely difficult already to get an appointment at the Dr's surgery and often you are unable to get an appointment for over 48 hours. This is already an unacceptable wait and with an additional 480 homes this waiting time would increase significantly.</p> <p>There is also the same issue with dental surgeries with very few if any NHS places available for patients. Your proposal includes provision for affordable housing and this would mean an increased demand for dental services especially NHS</p>	<p>To make the core strategy sound the following would have to be done-</p> <p>Additional infant and junior school places to include long term funding for buildings and teaching staff.</p> <p>Additional secondary school places to include long term funding for building and teaching staff. Detached playing fields are not an option. Serious concerns over whether the growth of Tring School that is planned is sustainable.</p> <p>Another Dr's surgery with a number of Dr's to improve patient care and reduce waiting times for appointments and services.</p> <p>Increased Dental provision, especially NHS to improve patient care and reduce waiting times for</p>		

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610555	Mrs Rose Beck					Paragraph	22.3	22.3	Objecting	Yes	No	b) Effective	<p>The proposal for 480 new homes is unsound because the services in Tring will not be able to cope. Please see comments on paragraph 22.4 re why we do not have sufficient provision at infant, junior and secondary schools.</p> <p>We only have one main Dr's surgery in Tring with a huge amount of patients already registered. It is extremely difficult already to get an appointment at the Dr's surgery and often you are unable to get an appointment for over 48 hours. This is already an unacceptable wait and with an additional 480 homes this waiting time would increase significantly.</p> <p>There is also the same issue with dental surgeries with very few if any NHS places available for patients. Your proposal includes provision for affordable housing and this would mean an increased demand for dental services especially NHS places. It is already extremely difficult to get appointments and this difficulty would increase further.</p> <p>The local supermarket, Tesco is of limited size and often does not have enough stock for the current</p>	<p>To make the core strategy sound the following would have to be done-</p> <p>Additional infant and junior school places to include long term funding for buildings and teaching staff.</p> <p>Additional secondary school places to include long term funding for building and teaching staff. Detached playing fields are not an option. Serious concerns over whether the growth of Tring School that is planned is sustainable.</p> <p>Another Dr's surgery with a number of Dr's to improve patient care and reduce waiting times for appointments and services.</p> <p>Increased Dental provision, especially NHS to improve patient care and reduce waiting times for appointments and services.</p> <p>An additional supermarket or increased size of the current Tesco.</p> <p>The water supply would remain a concern and I cannot propose a</p>	No, I do not wish to participate at the oral examination	

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611332	Mr Thomas Sanders					Paragraph	22.3	22.3	Objecting	No	No	c) Consistent with national policy	Development of green belt land is not permitted	Cease development of green belt land and promote the development of brown field sites.	Yes, I wish to participate at the oral examination	Because I am not in agreement with this proposal
610553	Mrs Wendy Doughty					Paragraph	22.3	22.3	Objecting	Yes	No	b) Effective	<p>The proposal for 480 new homes is unsound because the services in Tring will not be able to cope. Please see comments on paragraph 22.4 re why we do not have sufficient provision at infant, junior and secondary schools.</p> <p>We only have one main Dr's surgery in Tring with a huge amount of patients already registered. It is extremely difficult already to get an appointment at the Dr's surgery and often you are unable to get an appointment for over 48 hours. This is already an unacceptable wait and with an additional 480 homes this waiting time would increase significantly.</p> <p>There is also the same issue with dental surgeries with very few if any NHS places available for patients. Your proposal includes provision for affordable housing and this would mean an increased demand for dental services especially NHS places. It is already extremely difficult to get appointments and this difficulty would increase further.</p> <p>The local supermarket, Tesco is of limited size and often does not have</p>	<p>To make the core strategy sound the following would have to be done-</p> <p>Additional infant and junior school places to include long term funding for buildings and teaching staff.</p> <p>Additional secondary school places to include long term funding for building and teaching staff. Detached playing fields are not an option. Serious concerns over whether the growth of Tring School that is planned is sustainable.</p> <p>Another Dr's surgery with a number of Dr's to improve patient care and reduce waiting times for appointments and services.</p> <p>Increased Dental provision, especially NHS to improve patient care and reduce waiting times for appointments and services.</p> <p>An additional supermarket or increased size of the current Tesco.</p> <p>The water supply would remain a concern and I cannot propose a</p>	No, I do not wish to participate at the oral examination	

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													<p>narrow and cannot be widened. There are also many children from primary to secondary school who cross Miswell Lane, without a crossing or crossing patrol and there is already a huge risk with the amount of cars that use this road and the amount of resident's cars that are parked on this road. With the proposed development there would be an increased amount of children crossing this road so increasing this risk. We cannot put our children's safety at risk. If the access was on the other side of the site, Aylesbury Road then the cars on this road travel at extremely high speeds and there would be an issue with entry and exit to the new development.</p> <p>The proposed increase in the industrial site on the western edge of town is also unsound. The current industrial site is not fully occupied and there are already many empty units. There is also a large industrial site just outside of Tring, in Pitstone which is also not fully occupied. The expansion plans are not sound because there is no demand for an increase in industrial premises in the Tring area.</p> <p>Tring is already very limited in the facilities for our young people and by the building of 480 new homes there would be even more of a need for these. Young people in Tring have very little to do, especially on the western side, there is only the recreation ground with a football court and playground. The youth club is only opened limited hours and the skate park is small and located on the other edge of town. There is a risk of anti social behaviour from young people due to not having anywhere to go or anything to do. We do not want our</p>			

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													young people hanging out in parks or on street corners and by not increasing the provision for them but increasing the number of young people in the locality we are doing them a huge disservice.			
398218		Hertfordshire County Council (Hertfordshire Property)	211007	Mr Richard Lewis	Vincent & Gorbings	Paragraph	22.3	22.3	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.
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	22.3	22.3	Objecting	No	No		<p>The Core Strategy is unsound because it is not justified, effective and is not consistent with national policy.</p> <p>The proposal for housing allocations for 150 dwellings in the Green Belt is not justified by the facts. The lower figure of 9,835 new dwellings in the borough set out as Option 1 in the Draft Core Strategy, should be planned for, and this would not require this allocation. This allocation is in about the most unsustainable location at Tring that is possible, being furthest from the railway station and likely to encourage private car usage, and</p>	To ensure that the Inspector's Examination is fully informed of the Planning Issues of concern to CPRE Hertfordshire.	Yes, I wish to participate at the oral examination	

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													therefore contrary to the intentions of the Core Strategy.			
610893	mr jason potter					Paragraph	22.3	22.3	Objecting	No	No	a) Justified	<p>It seems strange that this site in Icknield Way does not seem to have been surveyed correctly for the Wild Life and their Habitat, i.e. rare birds, bats, owls, and all the other wild life and plant life that helps to sustain the local eco system around this area. For example there are Red Kites nesting in the middle of the planned building site, when we raised this with the planners they told us the field next to this site has been demmed as natural beauty. This does not sound like any real planning has been done or considered to relocate any of the rare wild life currently present on this site. Taking this Green Belt Land would surely definatly, permanently, destroy this sensitive balance of wild life and wild flora.</p> <p>Having read through a lot the comments, i agree with Mr. Colin White,s comments" The board considers that this site, which is immediately adjacent to the Chilterns AONB, could not be developed without there being a significant detrimental impact on the nationally protected landscape and its setting. This site is remote from the town centre of Tring and if developed, it would be likely to result in a significant number of car borne journeys to access local services and facilities."</p> <p>I also totally support the comments made by Mr. Mark Flood, "There is no apparent justification for reverting to an option that excludes Greenfield extensions altogether. The dwelling numbers sought are in</p>	I do not think this has been done correctly as every person i have spoken to around this area did not know about this and could not find any info on this. Shouldn't any planning request be open and clear to the people that are directly affected by this. Also this land was put up for common land which was rejected by the council is this just to get this very unpopular plan through the back door so no one has a chance to say no or use the localism act against the plan.	Yes, I wish to participate at the oral examination	I have lived in Tring for over 38 years and do not feel this is the best way to better Tring, but just a way of meeting targets that no longer apply and putting extra financial stress in a time of such hardship and uncertainty. Again we should make Tring better not bigger. I feel that everyone should have a voice in this as there is a new law, Localism Act, which was set up to protect Green Belt Land and the people living in it.

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													<p>fact higher than those in the last consultation in summer 2009.</p> <p>Option 2 should be pursued but with land north of Station Road shown as the local allocation in preference to land west of the town</p> <p>The land off Station Road carries the same Green Belt designation as the Council's selected site, but forms part of a larger swathe of land that can be used as appropriate to provide 150 dwellings in the most sustainable manner. It is close to the railway station and adjoins an existing pedestrian/cycle path. "</p> <p>I also feel that these plans for all the sites do not seem to take in any thoroughly thought out problems like extra amount of vehicles on our Tring roads, which are not always in good repair due to lack of funding, also with more families moving into the area do the Council not have the obligation to provide schools places for all of them and how do they propose to provide the extra school places when all our schools in Tring are already at breaking point not only with places but with lack of funding from central government, as an example very recently in the last two months Tring School has sent all parents a letter begging for money to fix a failling heating system as if it breaks they will not be given money to replace it and the school will be closed. Surely we should be fixing the infrastructure of Tring itself before going ahead and building more homes on Green Belt Land.</p>			

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211503	Mr Colin White	Chilterns Conservation Board				Paragraph	22.3	22.3	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</p>	Amend Paragraph 22.3 to highlight the fact that the site chosen is partially within the AONB and there is a need to ensure that the AONB is conserved and enhanced and that the setting of the AONB is not detrimentally affected. Highlight that no housing or employment uses will be within the AONB and that the special qualities of the AONB will be conserved and enhanced.	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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>Paragraph 22.3 introduces a local allocation of 150 dwellings at Tring. In order to be consistent with the vision for the town the Board considers that it is necessary to highlight the fact that the site chosen is partially within the AONB (or so it appears from Figure 24) and there is a need to ensure that the AONB is conserved and enhanced and that the setting of the</p>			

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													AONB is not detrimentally affected. The opportunity could be taken here to highlight that no housing or employment uses will be within the AONB and that the special qualities of the AONB will be conserved and enhanced.			
398611	Dr Robert Woodman	Drayton Beauchamp Parish Meeting				Paragraph	22.3	22.3	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>Developments in Tring should minimise the impact on the AONB.</p> <ol style="list-style-type: none"> 1. Alternative areas for development should be sought not visible from the AONB. 2. Development near the AONB should only be started once other alternatives have been exhausted. 3. Development should be minimised and no more than 150 homes. 4. Development should be away from the AONB leaving a soft border of grass and trees. 5. Developments should be concentrated and start from Field. <p>Fig. 24 shows the local allocation in part of AONB. The local boundary and proximity of the AONB is not shown. There should be no development within the AONB.</p> <p>Our Pre-submission Representation gives photographic evidence of the similarity between the AONB and the adjacent land proposed for development. Most of the proposed development land is visible from the Chiltern escarpment and will detract</p>	<p>1. There should be no development within the AONB.</p> <p>2. Developments within Tring should minimise the impact on the AONB.</p>	Yes, I wish to participate at the oral examination	Because of our interest in the area we need to counter arguments put forward by others for development at the West End of Tring.

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													<p>from the views.</p> <p>There is no evidence in the Core Strategy that all alternative areas for development in Tring, not visible from the AONB, have been exhausted.</p> <p>The area chosen for development (Icknield Way) is on the highest land and particularly visible from the AONB. In contrast the area near Field 3 on our submission is mainly hidden from view, does not block possible extensions to the Industrial Estate and would provide easier car access to the local shops and services in Western Road.</p>			
610088	Mr Martin Hicks	HBRC				Paragraph	delivering the vision	22.3	Objecting	No	b) Effective	<p>I consider that, as advised previously:</p> <p style="padding-left: 40px;">the Vision should also include recognising the 'farming heritage of the countryside around Tring'; and</p> <p style="padding-left: 40px;">The Delivery should include 'the maintenance of viable farming'.</p> <p>Without these, the nature of the towns green hinterland desired in the vision cannot be achieved. It is otherwise likely to degrade into horse paddocks, redundant land or speculative development parcels, as parts already are.</p>	The Vision should reflect the farming heritage which currently characterises much of the countryside around Tring, and therefore the character of the Market Town.	No, I do not wish to participate at the oral examination		
630502	Mr Richard Scott		609961	Mr Laurence Wilbraham		Paragraph	22.3	22.3	Objecting	Yes	No		Whilst para. 22.3 indicates that tring will deliver around 480 dwellings in the plan period there is no indication of where this development will take place other than 150 dwellings at Icknield way. The remaining 330 dwellings cannot be provided within the built up area as there is	Amend/expand para. 22.3 to provide greater clarity re the vision for the future development of Tring during the plan period. This should include the general location for additional housing and employment land during the plan period to the south-east of the	No, I do not wish to participate at the oral examination	

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													insufficient land available to achieve this. Extension(s) to the town will be necessary and the core strategy should identify the broad location for growth. Whilst para. 8.23 indicates that the countryside will provide town with clearly defined boundaries including Icknield way to the north, the Pendley estate to the east, the edge of the Chilterns. Aonb to the south, if the existing town boundary is to be retained in these locations then this should be stated in the Tring place strategy together with the general location for the 330 dwelling needed to meet the 480 dwelling target for the town. The only feasible direction for future growth of the town is to the south east (north of London road) extending to Cow lane. The Aonb designation applies to the land to the east of Cow lane, to the south of London road and the built up area of the town, to the west up to the A41 and north of New Mill. The land subject to a Article 4 direction between Bulbourne road and Marschcroft lane is unsuitable for development and encroachment north of Ickniel way would harm the countryside setting of the town to the north-west. By contrast the land south-east of the town and north of London road has a landscape character which can better accommodate a larger scale housing development, has good access to the principal road network and good public transport links and is close to the town centre.	town north of London road.		
610554	Mr Steve Doughty					Paragraph	22.4	22.4	Objecting	Yes	No	b) Effective	The Core Strategy in regard to the expansion of Tring School is unsound because the school has already got 1500+ students and is increasing in numbers yearly. Already it is one of the largest schools in Hertfordshire. Your proposal would mean that there	With regard to Tring School it is very difficult to suggest what would make it sound. Tring School is the only secondary school in this area and to increase in size to possibly 2000 students could make it very difficult to manage. Tring School is a very good school	No, I do not wish to participate at the oral examination	

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													<p>would be 300 students per year of entry, meaning that there would be 1500 students in Years 7-11 only. Due to the ever increasing Sixth Form there is the potential the school could end up with 2000+ students. Due to Government budget cuts the school has already had to make redundancies and is working at full capacity so without massive additional funding this growth would be unsustainable. There are not enough classrooms to accommodate this growth and without additional buildings the class sizes would have to increase massively to accommodate the two new forms of entry. Teaching staff are difficult to recruit in this area because of the high house prices and additional teaching staff would be needed.</p> <p>There is no provision for increased places at infant and junior school level. There are only limited places at infant and junior school level and they would not be able to cope with the demands placed on them by the additional 480 houses that you are proposing. Children of this age cannot be expected to travel outside of their local town to other schools. The nearest town is Berkhamsted and they are also oversubscribed at infant and junior level.</p> <p>The detached playing fields are not a viable option because they would not be able to be used during the school day. It would be impossible to get a class of students to and from these detached playing fields during a 1 hour lesson. By the time the students had changed, walked to the playing fields they would only get a very short period of time before they would have to begin the journey back with time to get changed. There is also the health</p>	<p>with good teaching standards and reasonable class sizes, an increase in students could see the learning and attainment of students suffer. Without additional long term funding for the recruitment of excellent teaching and support staff and the provision of new buildings this increase could not be accommodated.</p> <p>Re the infant and junior schools there would also have to be expansion to accommodate the needs of 480 new homes. This would also need long term funding for teaching and support staff and the provision of new buildings.</p> <p>The proposal of detached playing fields is not sound and I cannot propose a change that will make it sound.</p> <p>For the strategy to be sound they would have to ensure that additional funding was secured to enable the recruitment of good teachers and the provision of new classrooms and funding for these. The detached playing fields are not an option.</p>		

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													and safety issue of having to supervise students off site, which would require more staff to accompany the students that is necessary with the attached playing fields. Transport by bus is not viable due to the large numbers of students involved in these lessons.			
610555	Mrs Rose Beck					Paragraph	22.4	22.4	Objecting	Yes	No	b) Effective	<p>The Core Strategy in regard to the expansion of Tring School is unsound because the school has already got 1500+ students and is increasing in numbers yearly. Already it is one of the largest schools in Hertfordshire. Your proposal would mean that there would be 300 students per year of entry, meaning that there would be 1500 students in Years 7-11 only. Due to the ever increasing Sixth Form there is the potential the school could end up with 2000+ students. Due to Government budget cuts the school has already had to make redundancies and is working at full capacity so without massive additional funding this growth would be unsustainable. There are not enough classrooms to accommodate this growth and without additional buildings the class sizes would have to increase massively to accommodate the two new forms of entry. Teaching staff are difficult to recruit in this area because of the high house prices and additional teaching staff would be needed.</p> <p>There is no provision for increased places at infant and junior school level. There are only limited places at infant and junior school level and they would not be able to cope with the demands placed on them by the additional 480 houses that you are proposing. Children of this age</p>	<p>With regard to Tring School it is very difficult to suggest what would make it sound. Tring School is the only secondary school in this area and to increase in size to possibly 2000 students could make it very difficult to manage. Tring School is a very good school with good teaching standards and reasonable class sizes, an increase in students could see the learning and attainment of students suffer. Without additional long term funding for the recruitment of excellent teaching and support staff and the provision of new buildings this increase could not be accommodated.</p> <p>Re the infant and junior schools there would also have to be expansion to accommodate the needs of 480 new homes. This would also need long term funding for teaching and support staff and the provision of new buildings.</p> <p>The proposal of detached playing fields is not sound and I cannot propose a change that will make it sound.</p> <p>For the strategy to be sound they would have to ensure that additional funding was secured to enable the recruitment of good teachers and the provision of new classrooms and funding for these.</p>	No, I do not wish to participate at the oral examination	

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													cannot be expected to travel outside of their local town to other schools. The nearest town is Berkhamsted and they are also oversubscribed at infant and junior level. The detached playing fields are not a viable option because they would not be able to be used during the school day. It would be impossible to get a class of students to and from these detached playing fields during a 1hour lesson. By the time the students had changed, walked to the playing fields they would only get a very short period of time before they would have to begin the journey back with time to get changed. There is also the health and safety issue of having to supervise students off site, which would require more staff to accompany the students that is necessary with the attached playing fields. Transport by bus is not viable due to the large numbers of students involved in these lessons.	The detached playing fields are not an option.		
611332	Mr Thomas Sanders					Paragraph	22.4	22.4	Objecting	No	No	b) Effective	The development will exceed the capacity for the primary schools in Tring and there are no proposals to extend capacity in this area. Where will all the new young children go? All well and good proposing additional support for the already over-extended secondary school, but what about the primary schools and their open spaces / playing fields? Are you proposing to provide housing only to those with children over a certain age? This policy does not make sense when all the schooling in Tring is at full capacity.	Provide a new primary school with playing fields and other required amenities to support the overall planning policy	Yes, I wish to participate at the oral examination	To effectively express my views
610552	Miss Julie Stefan					Paragraph	22.4	22.4	Objecting	Yes	No	b) Effective	The Core Strategy in regard to the expansion of Tring School is unsound because the school has already got 1500+ students and is increasing in numbers yearly.	With regard to Tring School it is very difficult to suggest what would make it sound. Tring School is the only secondary school in this area and to increase	No, I do not wish to participate at the oral examination	

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													<p>Already it is one of the largest schools in Hertfordshire. Your proposal would mean that there would be 300 students per year of entry, meaning that there would be 1500 students in Years 7-11 only. Due to the ever increasing Sixth Form there is the potential the the school could end up with 2000+ students. Due to Government budget cuts the school has already had to make redundancies and is working at full capacity so without massive additional funding this growth would be unsustainable.</p> <p>There are not enough classrooms to accomodate this growth and without additional buidlings the class sizes would have to increase massively to accomodate the two new forms of entry. Teaching staff are difficult to recruit in this area because of the high house prices and additional teaching staff would be needed.</p> <p>There is no provision for increased places at infant and junior school level. There are only limited places at infant and junior school level and they would not be able to cope with the demands placed on them by the additional 480 houses that you are proposing. Children of this age cannot be expected to travel outside of their local town to other schools. The nearest town is Berkhamsted and they are also over subscibed at infant and junior level.</p> <p>The detached playing fields are not a viable option because they would not be able to be used during the school day. It would be impossible to get a class of students to and from these detached playing fields during a 1hour lesson. By the time the students had changed, walked to the playing fields they would only get a very short period of time before they would have to begin the</p>	<p>in size to possibly 2000 students could make it very difficult to manage. Tring School is a very good school with good teaching standards and reasonable class sizes, an increase in students could see the learning and attainment of students suffer. Without additional long term funding for the recruitment of excellent teaching and support staff and the provision of new buildings this increase could not be accomodated.</p> <p>Re the infant and junior schools there would also have to be expansion to accomodate the needs of 480 new homes. This would also need long term funding for teaching and support staff and the provision of new buildings.</p> <p>The proposal of detached playing fields is not sound and I cannot propose a change that will make it sound.</p> <p>For the strategy to be sound they would have to ensure that additional funding was secured to enable the recruitment of good teachers and the provision of new classrooms and funding for these. The detached playing fields are not an option.</p>	n	

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													journey back with time to get changed. There is also the health and safety issue of having to supervise students off site, which would require more staff to accompany the students than is necessary with the attached playing fields. Transport by bus is not viable due to the large numbers of students involved in these lessons and the cost implications			
610553	Mrs Wendy Doughty					Paragraph	22.4	22.4	Objecting	Yes	No	b) Effective	<p>The Core Strategy in regard to the expansion of Tring School is unsound because the school has already got 1500+ students and is increasing in numbers yearly. Already it is one of the largest schools in Hertfordshire. Your proposal would mean that there would be 300 students per year of entry, meaning that there would be 1500 students in Years 7-11 only. Due to the ever increasing Sixth Form there is the potential the school could end up with 2000+ students. Due to Government budget cuts the school has already had to make redundancies and is working at full capacity so without massive additional funding this growth would be unsustainable. There are not enough classrooms to accommodate this growth and without additional buildings the class sizes would have to increase massively to accommodate the two new forms of entry. Teaching staff are difficult to recruit in this area because of the high house prices and additional teaching staff would be needed.</p> <p>There is no provision for increased places at infant and junior school level. There are only limited places at infant and junior school level and they would not be able to cope with the demands placed on them by the additional 480 houses that you are</p>	<p>With regard to Tring School it is very difficult to suggest what would make it sound. Tring School is the only secondary school in this area and to increase in size to possibly 2000 students could make it very difficult to manage. Tring School is a very good school with good teaching standards and reasonable class sizes, an increase in students could see the learning and attainment of students suffer. Without additional long term funding for the recruitment of excellent teaching and support staff and the provision of new buildings this increase could not be accommodated.</p> <p>Re the infant and junior schools there would also have to be expansion to accommodate the needs of 480 new homes. This would also need long term funding for teaching and support staff and the provision of new buildings.</p> <p>The proposal of detached playing fields is not sound and I cannot propose a change that will make it sound.</p> <p>For the strategy to be sound they would have to ensure that additional funding was secured to enable the recruitment of good teachers and the provision of new classrooms and funding for these.</p>	No, I do not wish to participate at the oral examination	

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													<p>proposing. Children of this age cannot be expected to travel outside of their local town to other schools. The nearest town is Berkhamsted and they are also oversubscribed at infant and junior level.</p> <p>The detached playing fields are not a viable option because they would not be able to be used during the school day. It would be impossible to get a class of students to and from these detached playing fields during a 1 hour lesson. By the time the students had changed, walked to the playing fields they would only get a very short period of time before they would have to begin the journey back with time to get changed. There is also the health and safety issue of having to supervise students off site, which would require more staff to accompany the students that is necessary with the attached playing fields. Transport by bus is not viable due to the large numbers of students involved in these lessons.</p>	The detached playing fields are not an option.		
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	22.4	22.4	Objecting	No	No		<p>Paragraph 22.4 is not an accurate reflection of the position of the County Council. As stated at para 5.42 of HCC's previous representation in November 2010, it would be more accurate for the wording to state;</p> <p>'It would be prudent to put in place open space policies that enable the expansion of Tring School, should it be required'.... (Policy CS23 of the CS achieves that)...., and to assist in the delivery of new playing fields. There will be further discussions with HCC relating to the location of these new playing fields and the</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

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													location of them will be identified through the Site Allocations DPD. Issues of funding and delivery will be dealt with via the IDP and the Planning Obligations SPD.			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.
611332	Mr Thomas Sanders					Paragraph	22.8	22.8	Objecting	No	No	b) Effective	The level of traffic using Miswell Lane is already unsafe considering the width of the road and the parking of vehicles along each side. How does this plan consider the increase in traffic volumes? What consideration has been made to reduce this bottleneck and ensure safe crossing of children to the local Goldfield Primary School?	Removal of traffic from this 'rat run' which is not suitable for the level of traffic using it. Place traffic calming measures and other control features to make it suitable for local residential use.	Yes, I wish to participate at the oral examination	To fully represent the views of the community.
611332	Mr Thomas Sanders					Paragraph	22.9	22.9	Objecting	No	No	b) Effective	The local primary health care facility is already over stretched and the ability to make a doctors appointment is limited.	New health care facilities to support the development or put the development in close proximity to an area with spare capacity.	Yes, I wish to participate at the oral examination	To represent my views.
610552	Miss Julie Stefan					Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	b) Effective	Re the site allocation on the Western side of Tring - this is Green Belt land and therefore should be protected. This is already a strong long term Green Belt Boundary and does not need to be altered. It is surrounded by an Area of Outstanding Natural Beauty and this development would go to the boundaries of this land. The land is currently in use as grazing for	Re the Western edge of town site, alternative sites that are not Green Belt land and without access issues should be explored and identified. There is no need or demand for the industrial area to be extended at this current time and in the current economic climate.	No, I do not wish to participate at the oral examination	

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													<p>horses and also the Tring and District Horse Shows hold approximately 4 shows per year on this land. There is a footpath across this land which is in frequent use and would have to be maintained. There is an abundance of wildlife in these fields, including badger sets and red kites. By developing this land we would be disturbing this wildlife without just cause.</p> <p>Vehicular access to this site is difficult. If the access is from Icknield Way there are issues regarding the speed of the road and the amount of traffic on this road. It would be difficult for traffic to enter and exit the site and could increase crashes on this road. Also by making the access on Icknield Way there would be an increased amount of traffic using Miswell Lane. Miswell Lane is already too narrow and cannot be widened. There are also many children from primary to secondary school who cross Miswell Lane, without a crossing or crossing patrol and there is already a huge risk with the amount of cars that use this road and the amount of residents cars that are parked on this road. With the proposed development there would be an increased amount of children crossing this road so increasing this risk. We cannot put our children's safety at risk. If the access was on the other side of the site, Aylesbury Road then the cars on this road travel at extremely high speeds and there would be an issue with entry and exit to the new development.</p> <p>Re access for the increased industrial area, Icknield way is extremely narrow at the New Mill end of Tring and the increased amount of heavy vehicles on this</p>			

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													<p>road would be extremely dangerous to other vehicles and pedestrians.</p> <p>The proposed increase in the industrial site on the western edge of town is also unsound. The current industrial site is not fully occupied and there are already many empty units. There is also a large industrial site just outside of Tring, in Pitstone which is also not fully occupied. The expansion plans are not sound because there is no demand for an increase in industrial premises in the Tring area.</p>			
333630	Mr Stephen Buckell					Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	a) Justified	Existing residents adjacent to the proposed development of 150 houses and open spaces were not consulted adequately. Other options to accommodate these new houses elsewhere in Tring were dropped without full discussion with residents. Much was made of keeping Tring compact in the future and yet building at the west of the town does the opposite.		No, I do not wish to participate at the oral examination	
610554	Mr Steve Doughty					Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	b) Effective	<p>Re the site allocation on the Western side of Tring - this is Green Belt land and therefore should be protected. This is already a strong long term Green Belt Boundary and does not need to be altered. It is surrounded by an Area of Outstanding Natural Beauty and this development would go to the boundaries of this land. The land is currently in use as grazing for horses and also the Tring and District Horse Shows hold approximately 4 shows per year on this land. There is a footpath across this land which is in frequent use and would have to be maintained. There is an abundance of wildlife in these fields, including badger sets and red kites. By developing this</p>	<p>Re the Western edge of town site, alternative sites that are not Green Belt land and without access issues should be explored and identified.</p> <p>There is no need or demand for the industrial area to be extended at this current time and in the current economic climate.</p>	No, I do not wish to participate at the oral examination	

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													<p>land we would be disturbing this wildlife without just cause.</p> <p>Vehicular access to this site is difficult. If the access is from Icknield Way there are issues regarding the speed of the road and the amount of traffic on this road. It would be difficult for traffic to enter and exit the site and could increase crashes on this road. Also by making the access on Icknield Way there would be an increased amount of traffic using Miswell Lane. Miswell Lane is already too narrow and cannot be widened. There are also many children from primary to secondary school who cross Miswell Lane, without a crossing or crossing patrol and there is already a huge risk with the amount of cars that use this road and the amount of resident's cars that are parked on this road. With the proposed development there would be an increased amount of children crossing this road so increasing this risk. We cannot put our children's safety at risk. If the access was on the other side of the site, Aylesbury Road then the cars on this road travel at extremely high speeds and there would be an issue with entry and exit to the new development.</p> <p>Re access for the increased industrial area, Icknield way is extremely narrow at the New Mill end of Tring and the increased amount of heavy vehicles on this road would be extremely dangerous to other vehicles and pedestrians.</p> <p>The proposed increase in the industrial site on the western edge of town is also unsound. The current industrial site is not fully occupied and there are already many empty</p>			

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													units. There is also a large industrial site just outside of Tring, in Pitstone which is also not fully occupied. The expansion plans are not sound because there is no demand for an increase in industrial premises in the Tring area.			
610555	Mrs Rose Beck					Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	b) Effective	<p>Re the site allocation on the Western side of Tring - this is Green Belt land and therefore should be protected. This is already a strong long term Green Belt Boundary and does not need to be altered. It is surrounded by an Area of Outstanding Natural Beauty and this development would go to the boundaries of this land. The land is currently in use as grazing for horses and also the Tring and District Horse Shows hold approximately 4 shows per year on this land. There is a footpath across this land which is in frequent use and would have to be maintained. There is an abundance of wildlife in these fields, including badger sets and red kites. By developing this land we would be disturbing this wildlife without just cause.</p> <p>Vehicular access to this site is difficult. If the access is from Icknield Way there are issues regarding the speed of the road and the amount of traffic on this road. It would be difficult for traffic to enter and exit the site and could increase crashes on this road. Also by making the access on Icknield Way there would be an increased amount of traffic using Miswell Lane. Miswell Lane is already too narrow and cannot be widened. There are also many children from primary to secondary school who</p>	<p>Re the Western edge of town site, alternative sites that are not Green Belt land and without access issues should be explored and identified.</p> <p>There is no need or demand for the industrial area to be extended at this current time and in the current economic climate.</p>	No, I do not wish to participate at the oral examination	

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													<p>cross Miswell Lane, without a crossing or crossing patrol and there is already a huge risk with the amount of cars that use this road and the amount of resident's cars that are parked on this road. With the proposed development there would be an increased amount of children crossing this road so increasing this risk. We cannot put our children's safety at risk. If the access was on the other side of the site, Aylesbury Road then the cars on this road travel at extremely high speeds and there would be an issue with entry and exit to the new development.</p> <p>Re access for the increased industrial area, Icknield way is extremely narrow at the New Mill end of Tring and the increased amount of heavy vehicles on this road would be extremely dangerous to other vehicles and pedestrians.</p> <p>The proposed increase in the industrial site on the western edge of town is also unsound. The current industrial site is not fully occupied and there are already many empty units. There is also a large industrial site just outside of Tring, in Pitstone which is also not fully occupied. The expansion plans are not sound because there is no demand for an increase in industrial premises in the Tring area.</p>			
610553	Mrs Wendy Doughty					Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	b) Effective	<p>Re the site allocation on the Western side of Tring - this is Green Belt land and therefore should be protected. This is already a strong long term Green Belt Boundary and does not need to be altered. It is surrounded by an Area of Outstanding Natural Beauty and this development would go to the</p>	<p>Re the Western edge of town site, alternative sites that are not Green Belt land and without access issues should be explored and identified.</p> <p>There is no need or demand for the industrial area to be extended</p>	No, I do not wish to participate at the oral examination	

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													<p>boundaries of this land. The land is currently in use as grazing for horses and also the Tring and District Horse Shows hold approximately 4 shows per year on this land. There is a footpath across this land which is in frequent use and would have to be maintained. There is an abundance of wildlife in these fields, including badger sets and red kites. By developing this land we would be disturbing this wildlife without just cause.</p> <p>Vehicular access to this site is difficult. If the access is from Icknield Way there are issues regarding the speed of the road and the amount of traffic on this road. It would be difficult for traffic to enter and exit the site and could increase crashes on this road. Also by making the access on Icknield Way there would be an increased amount of traffic using Miswell Lane. Miswell Lane is already too narrow and cannot be widened. There are also many children from primary to secondary school who cross Miswell Lane, without a crossing or crossing patrol and there is already a huge risk with the amount of cars that use this road and the amount of resident's cars that are parked on this road. With the proposed development there would be an increased amount of children crossing this road so increasing this risk. We cannot put our children's safety at risk. If the access was on the other side of the site, Aylesbury Road then the cars on this road travel at extremely high speeds and there would be an issue with entry and exit to the new development.</p> <p>Re access for the increased industrial area, Icknield way is extremely narrow at the New Mill</p>	at this current time and in the current economic climate.		

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													<p>end of Tring and the increased amount of heavy vehicles on this road would be extremely dangerous to other vehicles and pedestrians.</p> <p>The proposed increase in the industrial site on the western edge of town is also unsound. The current industrial site is not fully occupied and there are already many empty units. There is also a large industrial site just outside of Tring, in Pitstone which is also not fully occupied. The expansion plans are not sound because there is no demand for an increase in industrial premises in the Tring area</p>			
211055	Mr Matthew Wood	Hertfordshire County Council				Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	No	No		<p>It is considered that the second bullet point in the 'principles' section for the</p> <p>Local Allocation for Tring, could more accurately, and helpfully, be amended to make reference to ;</p> <p>a contribution must be made towards educational and community facilities, including the potential provision of detached playing fields .</p> <p>3.50 Officers from Hertfordshire Property, (Planning Obligations) will be happy to discuss further how this need might be addressed through Community Infrastructure Levy (CIL)/IDP/Section 106 contributions.</p> <p>It is noted that the detail of Local Allocation 5 will be worked up through the Site Allocations DPD, which delivers 150 of the 480 new dwellings planned in Tring during the plan period.</p> <p>It will also be of critical importance to ensure that other residential development, other than that explicitly mentioned in the Local</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

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													Allocation in Tring makes the appropriate contributions towards provision of detached playing fields.			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				Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy. Local Allocation 5 should be removed from the Core Strategy because the removal of the land from the Green Belt is not justified by exceptional circumstances are required by national policy, in addition to the reasons to paragraph 22.3.	LA5 should be deleted from the text and Figure 24.	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.
591895	Mr Douglas Sawyer					Local Allocation. Icknield Way Tring	LA5	Table LA5	Supporting	Yes	Yes		I live in Bristol and am one of the co-owners of the land at Icknield Way. I am happy for the development of the land for housing and commercial development to go ahead.		No, I do not wish to participate at the oral examination	
619677		Blackjack Investments Ltd	398614	Mr Mark Flood	Insight Town Planning	Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	a) Justified	Core Strategy is unsound because it is not justified and is not consistent with national policy. Our client objects to the inclusion of local allocations within the CS.		Yes, I wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	c) Consistent with national policy	It is not sound because it is not Effective or 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.	Delete 'The layout, design, density and landscaping must create a soft edge with the Area of Outstanding Natural Beauty and secure a strong long term Green Belt boundary' from the principles and replace with: 'Whilst ensuring that no built development takes place within the Chilterns Area of Outstanding Natural Beauty, the layout, design, density and	No, I do not wish to participate at the oral examination	

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													<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 area of outstanding natural beauty."</p>	landscaping must ensure that the final built form creates a more natural transition from the edge of the town to the AONB whilst securing a strong long term Green Belt boundary'.		

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													<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 8th 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>Local allocation 5 at Tring has a limited set of principles attached to it. However, the Board considers that the text as drafted (the layout, design, density and landscaping must create a soft edge with the Area of Outstanding Natural Beauty and secure a strong long term Green Belt boundary) is not explicit enough about how the development may be brought about and what the likely impacts may be on the AONB. The Board understands that no built development will take place within the AONB as part of this allocation but this is not clear from the principles in this instance. The Board therefore suggests that the text should be deleted and replaced by text to read as follows: Whilst ensuring that no built development takes place within the Chilterns Area of Outstanding Natural Beauty, the layout, design, density and</p>			

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													landscaping must ensure that the final built form creates a more natural transition from the edge of the town to the AONB whilst securing a strong long term Green Belt boundary'.			
224301	Mr Ian Burrus					Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	No	No	c) Consistent with national policy	<p>This section states 'The layout, design, density and landscaping must create a soft edge with the Area of Outstanding Natural Beauty and secure a strong long term Green Belt boundary'.</p> <p>This plan involves developing on land already designated as Green belt (Icknield West). Therefore this proposal is failing to follow its own recommendation.</p> <p>Either the existing Green belt is protected in which case the core strategy is flawed or the core strategy is not following its own policy. This is contradictory.</p> <p>I have raised this issue by the relevant process to the council using its own comment system throughout this process but as usual the 'local' people are being ignored. I am certain that somebody in the council has already made their mind up that the proposals will go through. This is again exemplified by only a limited number of people in the local area being informed about the latest consultation process. Yet again an example of how undemocratic this whole process has been.</p>	To make the policy legal and compliant protect the existing Green belt boundaries.	No, I do not wish to participate at the oral examination	
398611	Dr Robert Woodman	Drayton Beauchamp Parish Meeting				Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified or Consistent with national policy.</p> <p>Developments in Tring should minimise the impact on the AONB.</p>	<p>1. There should be no development within the AONB.</p> <p>2. Developments within Tring should minimise the impact on the AONB.</p>	Yes, I wish to participate at the oral examination	Because of our interest in the area we need to counter arguments put forward by others for development at the West End

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													<p>1. Alternative areas for development should be sought not visible from the AONB.</p> <p>2. Development near the AONB should only be started once other alternatives have been exhausted.</p> <p>3. Development should be minimised and no more than 150 homes.</p> <p>4. Development should be away from the AONB leaving a soft border of grass and trees.</p> <p>5. Developments should be concentrated and start from Field.</p> <p>Fig. 24 shows the local allocation in part of AONB. The local boundary and proximity of the AONB is not shown. There should be no development within the AONB.</p> <p>Our Pre-submission Representation gives photographic evidence of the similarity between the AONB and the adjacent land proposed for development. Most of the proposed development land is visible from the Chiltern escarpment and will detract from the views.</p> <p>There is no evidence in the Core Strategy that all alternative areas for development in Tring, not visible from the AONB, have been exhausted.</p> <p>The area chosen for development (Icknield Way) is on the highest land and particularly visible from the AONB. In contrast the area near Field 3 on our submission is mainly hidden from view, does not block possible extensions to the Industrial Estate and would provide easier car</p>			of Tring.

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													access to the local shops and services in Western Road.			
398585	Mrs Susan Andrews					Local Allocation. Icknield Way Tring	LA 5	Table LA5	Objecting	Yes	No		<p>I have read in depth the Core Strategy Report and Local Development Framework with particular regard to proposals for Tring and comment as follows:</p> <p>Following discussions with the Planning Department I agree that YES the approximate 18 - 20 acres (the two fields adjoining the current industrial estate and housing land should be zoned for housing and industrial development - Icknield Way West (bordered by Icknield Way, Industrial site, Oakley Lane and Beaconsfield Road to the cemetery rear wall). This land can be developed for houses with little visual impact on the town and within easy walking access of Tring.</p> <p>I further understand and agree with the proposal that the AONB land, (being the additional 2 fields of approximate 20 acres from the proposed housing development land mentioned above up to the roundabout) is to be retained as open land. (bordered by Icknield Way, the roundabout, Aylesbury Road up to the cemetery and the proposed zoned housing development land). This retains the green corridor and separates Tring from Aston Clinton.</p> <p>However I disagree with that housing development should be less than the accepted 20 houses per acre. Land is and will become more "at a premium" for building. To allocate and develop land for houses at lower levels is an irresponsible waste of use of land.</p>		No, I do not wish to participate at the oral examination	

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													<p>In addition, it appears only 150 houses are proposed to be situated on the Icknield Way West land leaving some 330 houses to be built within the town in the next 20 years. The density of housing on land which is known to be available for building, i.e. Icknield Way West site, should be increased to accommodate maximum rather than minimum housing units, rather than hoping a lot of land will be passed for development in the future.</p> <p>Sports, leisure facilities and open land should be situated in the two fields up to the roundabout, currently ploughed and farmed where it is stated housing would definitely not be allowed. This would leave no requirement for open land to be situated in the zoned industrial/ housing area.</p> <p>In the long term after 20 years further development will be necessary. To allow more houses on the Icknield West site now will stop sprawling expansion of the town in the long term. I have lived in Tring for more than 65 years and am passionate about the town. Whilst every larger development such as Grove Park, London housing estate, etc has been opposed by residents of Tring, the town has always benefitted from the additional population. To even restrict development to 480 over 20 years does not allow the percentage of growth needed to accommodate population increase within the town let alone allow people from outside the area to move into Tring.</p>			
494131	Mr Michael Emmett	CALA Homes				Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy.	Proposal LA5 (and Table 9) - Replace "150" (capacity of Icknield Way local allocation) with	Yes, I wish to participate at the oral examination	CALA Homes has a controlling interest in the Icknield Way Tring Local

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													<p>CALA Homes controls 15.5 ha of land to the south of Icknield Way, Tring, west of the existing settlement boundary and extending eastwards to the A41/B4636/B488 roundabout. The Pre-Submission Core Strategy (Table 9, Proposal LA5) identifies this area, together a further 2.1 ha north of Aylesbury Road as a local allocation, to contribute to the Borough's housing provision over the plan period. The two parcels are outlined in red and blue respectively on the attached site plan, Appendix 1.</p> <p>This representation is made by CALA and does not purport to represent the views of the owners of the blue land. However, all of the land interests are collaborating such that a joint position statement is expected to be available at the time of the Core Strategy examination.</p> <p>CALA strongly supports the allocation of the site but does have significant concerns as to some of the associated provisions of the Core Strategy (CS), notably over delays to the timing of the site's release for development. Accordingly, detailed proposals have yet to be formulated, however, a contextual analysis has been undertaken and this is attached as Appendix 2. Moreover, the broad principles set out in CS Proposal LA5 and as discussed with Council officers are agreed and will form the basis of community engagement at the appropriate time. These are:</p> <p>The western part of the site (7.9 ha) is in the Chilterns AONB and will not be developed although it may accommodate open space uses.</p>	"300".	n	Allocation and as such has an important role to play in delivering a key element of the Core Strategy.

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													<p>The eastern part, the remainder, will be developed primarily for housing, of which 40% will be affordable.</p> <p>The site will also provide for the extension, if required, of the adjoining Icknield Way Industrial Estate to the north east and cemetery to the south east.</p> <p>To the extent over which CALA controls the site (this being the land edged red as mentioned above) its availability for development as proposed in the CS is confirmed.</p> <p>CALA unequivocally supports both the Borough Vision and the Vision for Tring as set out below paragraph 22.2 of the CS. However, it is strongly contended that three elements of the CS severely impede the fulfilment of that Vision. The delayed release of the local allocation for Tring via Policy CS3 and the distribution of just 480 new homes to the town are addressed in separate representations. The third concern, the subject of this submission, is the notional 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 which it is accepted will remain open and undeveloped. It is possible, as noted above, that a further 2.1ha will become available by the inclusion of adjoining land to the south, providing a total developable area of 9.7ha.</p>			

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													<p>It is understood that the Council wishes 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. While CALA questions the current need and demand for such use, particularly given the vacancy rates of existing premises, it is accepted that the allocation should facilitate further employment development should such demand arise during the plan period. If such provision is made, this would then leave a residual site area of circa 9ha for housing.</p> <p>Notwithstanding the site's edge of AONB location, given that, given CALA's ownership of the adjoining land to the west, the opportunity exists to screen and soften the urban edge without necessarily encroaching on the development area, and also that a high proportion (40%) of the development will be for affordable housing which will tend to be smaller homes, a density of 30-40 dph is considered reasonable. Indeed much less might be deemed to be failing to make efficient use of development land. In these circumstances a capacity of around 300 dwellings is advocated.</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 Dacorum Borough as a whole, must be a significant community benefit.</p>			
494847		Trustees of Drayton Beauchamp Parochial	626780		Cole Flatt & Partners	Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	c) Consistent with national	Tring Place Strategy and Proposal LA5 Whilst supporting the Borough	Refer to response to question 4 above	No, I do not wish to participate at the oral	

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		Charities										policy	<p>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.</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 & Partners).</p> <p>It is understood that the Council wished 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 be a significant community benefit.</p>		examination	
610050	mrs. maria potter					Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	a) Justified	<i>My family lives in Okeley Lane and Highfield Road and we certainly were not aware of this. We all knew that there were several proposed sites within Tring under consultation but I'm</i>	The Council do not seem to really listen or consult with those who will indeed be directly affected by these proposals and do seem to come across as trying to pass this as quickly and as quietly as	Yes, I wish to participate at the oral examination	

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													<p><i>sure we are not the only ones to be surprised to know that all other sites have been dropped and only the Field signalled on the plans is being considered.</i></p> <p><i>I spoke to one of the Strategic Planning Officers who when asked why the local residents had not been informed of these plans and the fact the plans for other sites had been dropped, told me that they had consulted with the PUBLIC, there were council meetings at Dacorum and this was discussed with the PUBLIC, and we would be able to give our comments but this was the site being marked for the Core Strategy Plan.</i></p> <p><i>I also raised the fact that I thought the Residents living within the closest area, i.e. Okeley Lane, Buckingham Road, Highfield Road, Beaconsfield Road, Miswell Lane, really all the properties situated between Icknield Way and Aylesbury Road, from Donkey Lane onwards, should have at least been made more aware that these meetings were taking place as not everyone has easy access to this. The Officer once again said they had consulted with the PUBLIC and this was the site most suitable to the proposals.</i></p> <p>Only a few weeks ago the water pressure in our area dropped dramatically due to problems with the pumping station, do we really need even more pressure on a service already under pressure?</p> <p>I do not know about you but I would</p>	possible in the hope that no objections will be put forward. I am very passionate about this and feel that our voice should be heard loud and clear as this will affect and have a huge impact on our childrens futures and generations to come and also we do have a right to be heard under the newLocalism Act.		

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													<p>like to be informed by the Council if something as dramatic as:</p> <p>the loss of another Green Area in our Town, used by many dog walkers, joggers, walkers and the 3 times a Year Horse Jumping show</p> <p>the building of 150 HOUSES of which 40% will be AFFORDABLE, which by the way will instantly reduce the Market Value of all the properties within the roads mentioned above by up to 40%, and if the travellers site does sneak in, then the devaluation will even be higher and make a lot of the houses impossible to sell, house insurance and car insurance will also instantly go up,</p> <p>our local schools which are already struggling with budgets, becoming even more subscribed to the point that our children will then not have a place in Primary or Secondary School in Tring and have to be placed in schools in Berkhamstead which is what already happens when you are refused a place in Tring School, for example,</p> <p>not being able to get a GP or Nurse appointment in our local surgery due to the over load another 150 HOUSES will bring to their service when they are already covering surrounding villages</p> <p>our class sizes in our local schools increasing to such a level that will affect not only the quality of education but also make the staff</p>			

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													<p>under more pressure bearing in mind all the budget cuts our local council and county council have made to not only the provision of teaching and teaching support staff but also to the up running of the schools. Those of us who have children at Tring school are very much aware that even the Head Teacher there is asking parents to contribute a regular payment for the upkeep and ensuring the Heating System does not break down and the school be shut because she no longer has the funds available and the Council will not replace the boilers because there is no money</p> <p>birds of prey as beautiful as the endangered RED KITE</p> <p>, which we all have seen flying above our houses and have been nesting in the trees of the fields they are proposing to build on, foxes, badgers, hedgehoggs and other wildlife as well, and the lovely horses which are permanently in the field as well,</p> <p><i>We could just go on and on adding to this list and I'm sure you will all think of many other issues relevant. How many of us will also then be put into forced Negative Equity?</i></p> <p><i>Friends who live near one of the other proposed sites (Cow Lane) demanded a meeting with the Council and Local Residents</i></p> <p><i>where they were able to strongly voice their opposition and it</i></p>			

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													<p><i>obviously worked as their proposed site was then dropped by the Strategic Planning. Why is it that they deserved to be heard and we don't?</i></p> <p><i>Considering the fact that our country is in recession and the Euro is also in a situation that might drag the UK further into recession, where is the money going to come from to develop and ensure that the infrastructure in Tring will be able to accommodate all these plans? There already is lots of empty properties for Rent in Tring and due to the current economic crisis also lots of properties for sale which are not selling due to the economic worries, how can you then justify building further in a small town/village like Tring?</i></p> <p>We could just go on and on adding to this list and I'm sure you will all think of many other issues relevant. How many of us will also then be put into forced Negative Equity?</p>			
502733	Mr Andy Barton	Aylesbury Vale District Council				Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	Yes	No	a) Justified	<p>This issue is regarding the westward expansion of Tring set out in the Tring Place Strategy and Tring Vision Diagram. The Proposed Submission Tring Vision Strategy proposes 480 homes at Tring between 2006-2031, 150 of which would be on a location referenced as LA5 (Icknield Way, west of Tring) and shown on the Tring Vision Diagram. As well as housing, there would also be employment development.</p> <p>We understand the exact site would not be drawn up in detail until the Site Allocations DPD stage. However there are impacts we wish to make clear at this stage so that Dacorum can take steps to avoid</p>	<p>The Tring Place Strategy and Proposal LA5 to be amended to identify landscape character, visual impact and transport impacts upon Aylesbury Vale and setting out that the site boundary, developable area, density, height and layout of development and a transport strategy for Proposal LA5 will be agreed by Dacorum, AVDC and Buckinghamshire County Council before proceeding to the Site Allocations DPD stage.</p>	<p>No, I do not wish to participate at the oral examination</p>	

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													<p>negative impacts upon landscapes and communities in our district. We have three areas of concern set out in our representations - landscape character, visual impact and transport impacts.</p> <p>Landscape Character and Visual Impacts</p> <p>The area shown for housing, employment and other development is west of the existing urban edge of Tring and potentially up to the district and county boundary. We have concerns on the visual and landscape character impact of developing potentially up to important landscapes in our district which are designated Green Belt and an Area of Outstanding Natural Beauty has not been taken into account when the proposed approach to development in the Core Strategy has been considered. The landscapes are also of local importance and are part of the Wendover Foothills Landscape Character Area (LCA10.4) as identified in our Landscape Character Assessment of May 2008 (please see http://www.aylesburyvaledc.gov.uk/planning-</p> <p>Proposal LA5 Icknield Way, west of Tring Aylesbury Vale District Council</p> <p>building/planning-policy/avldf-framework/avldf-evidence-base/environmentevidence/av-lca-may2008/). This landscape is sensitive to change and the key characteristics, distinctive features and intrusive elements are set out in the assessment for LCA 10.4. This same landscape in our district is also identified in the Areas of Sensitive Landscapes study</p>			

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													<p>(October 2008) as being particularly sensitive to</p> <p>change (please see http://www.aylesburyvaledc.gov.uk/planning-building/planningpolicy/avldf-framework/avldf-evidence-base/environment-evidence/aylesbury-valeareas-sensitive-landscape/).</p> <p>Transport</p> <p>There are no precise details of where the site would be, the extent of built</p> <p>development, and road access and layout would be. Therefore without a full transport impact assessment we wish to make the point that in detailed planning of the site there will need to liaison with Buckinghamshire County Council's Transport Development Control section and identification of the likely highway impacts of the development and the level and cost of mitigation required. The development will certainly impact on the A41/B488/B4009 junction which is on the district/county boundary, potentially effecting approaches to this junction within Buckinghamshire.</p> <p>We would also expect traffic from the site travelling south to impact on the B4009 in Buckinghamshire, and this impact should also be assessed. There needs to be a commitment in the Core Strategy Proposal LA5 to ensuring that the above issues will be dealt through joint working with AVDC and Buckinghamshire County Council with any adverse impacts overcome.</p>			
6105	Mr					Local Allocation.	LA5	Table	Objectin	No	No	a)	Houses should not be built on	Any new housing should be on	No, I do not	

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56	Peter Lightowler					Icknield Way Tring		LA5	g			Justified	Greenbelt Land. The proposed area is already jammed with too many vehicles especially the Miswell Lane approach to Tring. The risk is gridlock. Tring School is already too large. Having worked there for 10 years I know they have insufficient space for the present number of pupils and there is a maximum number in a school whereby the school functions efficiently. Their need is for buildings, not pupils or playing fields - especially remote ones. The risk is the deterioration of a good school.	brownfill nor greenfill sites. Infrastructure increase needs to be carefully planned to ensure already crowded roads and town center do not just become more crowded. Schools, surgeries, local amenities should be planned, not just present ones swamped. The proposed housing site is also linked with a proposed traveller site. You can't have both for obvious reasons.	wish to participate at the oral examination	
626155	Mr John Leggett	Parrott & Coales				Local Allocation. Icknield Way Tring	LA5	Table LA5	Supporting	Yes	Yes		Land in Upper Ickneild Way, Tring is under consideration for the district. The land can be made available for development at any time.			
626782		AJ Rowe & LJ Rowling	626780		Cole Flatt & Partners	Local Allocation. Icknield Way Tring	LA5	Table LA5	Objecting	No	c) Consistent with national policy		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. 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		No, I do not wish to participate at the oral examination	

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													<p>Flatt & Partners).</p> <p>It is understood that the Council wished 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 be a significant community benefit.</p>			
611332	Mr Thomas Sanders						Figure 24	Figure 24	Objecting	No	No	b) Effective	<p>1) Loss of local amenity space /green belt area</p> <p>2) Impact on birds of prey and other identified red book / red list species for example the red kite.</p> <p>3) Lack of local consultation regarding the development plan (please note the localism act).</p>	To develop the area of land between London Road & Cow Lane closer to schooling with space in the primary area, less impact on Thames water pumping station as further away from low pressure sensitive area. Existing greenfield and playing field areas in close proximity, and closer to local amenities in the town (shops etc.).	Yes, I wish to participate at the oral examination	To make full representation as to the paucity of the plan proposed when there are better solutions which have less visual and character impact on Tring.
398218		Hertfordshire County Council (Hertfordshire Property)	211007	Mr Richard Lewis	Vincent & Gorbings		Figure 24	Figure 24	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</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 it was identified as being necessary, as appropriate, or as a contingent source of housing land supply.

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													within the timescale of the Core Strategy. It is therefore a developable site, should it be required.			
211503	Mr Colin White	Chilterns Conservation Board					Figure 24	Figure 24	Objecting	Yes	No	c) Consistent with national policy	<p>It is not sound because it is not Effective or Consistent with national policy.</p> <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</p>	Amend Figure 24 by including the AONB boundary.	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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>Figure 24 could usefully be amended to include the AONB boundary as this is very important to the setting of Tring and Local Allocation 5.</p>			
611549	Ms	Three Rivers				Kings Langley Place Strategy	Chapter 23: Kings Langley	23	Objecting	Yes	No	b) Effective	We support the objectives for Kings Langley, however while the strategy	The strategy should indicate what infrastructure will be required as a	No, I do not wish to	

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	J Bowyer	District Council					Place Strategy					e	refers to improvement of the secondary school's facilities and the vision will support community facilities, the strategy does not indicate what infrastructure will be required as a result of planned development. The need for the Core Strategy to take adequate account of infrastructure requirements at Kings Langley was raised as an issue at the examination of the Three Rivers Core Strategy and we are concerned that the DBC Core Strategy does not currently make adequate provision for infrastructure. There is no Infrastructure Delivery Plan included as part of the Core Strategy which would be helpful to identify infrastructure likely to be required as a result of planned development. The Core Strategy would be more effective in securing necessary infrastructure if this were specifically identified within the Core Strategy.	result of planned development.	participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Kings Langley Place Strategy	Kings Langley Place Strategy	23	Supporting	Yes	Yes		The Kings Langley Place Strategy is supported in principle, however it should be noted that individual development proposals and sites will need to be assessed in respect of their impact on the waste water network. Depending on the precise location and scale of development proposed, local network upgrades could be required.	N/A	No, I do not wish to participate at the oral examination	
503294	Chris Shaw	Highways Agency				Kings Langley Place Strategy	Section 23	23	Objecting	Yes	No		Please see hard copy for further information. It is recommended that that the plan incorporates additional text within the Kings Langley Place Strategy which clarifies, where the threshold for a Transport Assessment is surpassed in accordance with	The Highways Agency proposes the following additional text in the Kings Langley Place Strategy: "All planning applications which meet the threshold for a Transport Assessment in accordance with requirements set out in Appendix B of DfT's	No, I do not wish to participate at the oral examination	

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													requirements set out in Appendix B of DfT's Guidance on Transport Assessment, and the 30 two-way vehicle link flow is surpassed in accordance with the Highways Agency's Protocol for Dealing with Planning Applications, that future planning applications include within their scope appropriate traffic assessment of M25 Junction 20, including the merges/diverges. In soundness terms, this evidence would help to justify what the impact is to the strategic road network.	Guidance on Transport Assessment, and exceeds the 30 two-way vehicle link flow in accordance with the Highways Agency's Protocol for Dealing with Planning Applications, should include within their scope appropriate traffic assessment of M25 Junction 20. Where necessary, the assessment should outline mitigation measures to ensure that if the capacity of the junction is exceeded, that the Strategic Road Network is „no worse off' than if the development did not take place, as specified in DfT Circular 02/2007."		
366491	Mr Brian Worrell					Paragraph	Local Objectives	23.1	Objecting	Yes	No	b) Effective	For a sizeable village, there is almost no sport and leisure facilities, with the exception of the football ground. This needs to be addressed and the opportunity is during the improvement of the secondary school facilities. Both the residents and the pupils will benefit with an expansion of dual use, both indoor and outdoor.	I suggest the second bullet point should include the words 'including sport and leisure provision indoor and outdoor' following the words 'school's facilities'		
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	Local Objectives	23.1	Objecting	No	No		<p>The reference to support of improvement of the secondary school's facilities is supported.</p> <p>Attention is drawn to the separate representation that has been submitted to</p> <p>DBC on behalf of Kings Langley Secondary School suggesting an amendment to the Major Developed Site Green Belt boundary. (MDS).</p> <p>It is considered that the combination of reviewing the MDS boundary together with the more flexible policy approach towards school expansions articulated in Policy CS23 (see page 6 above), will</p>	<p>That the wording of the second bullet in the list of local objectives be amended to read;</p> <p>„Support improvement of the secondary and primary school facilities'.</p> <p>It should be noted that the provision of a primary school in South East Hemel, see final bullet, para 3.33 and para 3.34 above, could potentially assist in freeing up capacity at Kings Langley Primary school.</p> <p>There is also an interrelationship between Local Planning Authority</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

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													assist Kings Langley Secondary school in the recycling of building stock, and in maintaining the attractiveness, and educational viability of the school. It should be noted that current CS forecasts suggest increasing pressure for school places at Kings Langley Primary school, which is washed over by an open land designation. Given the more flexible attitude towards open land designations evidenced by the wording in Policy CS23 it is considered that the local objective relating to support to expansion of school facilities could usefully be broadened to include the primary school.	administrative areas, with Three Rivers related development in Kings Langley generating child yield that might reasonably be expected to be satisfied in Kings Langley schools. The need to ensure that planning contributions/CIL funding is gathered and distributed appropriately to mitigate the impacts of development are therefore clear. Again, officers in Hertfordshire Property, (Planning obligations team), would welcome further tri partite discussions with officers from DBC and Three Rivers in association with any subsequent IDPs. Subject to the above observations, and to the suggested change, there is therefore support for the Kings Langley place 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.
610088	Mr Martin Hicks	HBRC					Kings Langley Vision	Statement Vision LA6	Objecting	No	b) Effective		I consider that the role of local farms in helping maintain the rural character of the land around the town - particularly to the south west - should be recognised within both the vision and delivery, as part of the means of maintaining the countryside around the town.	Refer to existing farming heritage within the vision.	No, I do not wish to participate at the oral examination	
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	23.3	23.3	Objecting	No	No		The Scheduled remains of a Dominican Priory (SM HT85) and medieval Royal Palace (SM HT84) are situated at the top of Langley Hill. Archaeological features are known to exist on land between the Royal Palace and the Scheduled medieval moated site of Little London (SM 11516). The medieval core of the settlement and area around Langley Hill and across to Little London moat have been identified as possessing high potential for the presence of heritage assets of archaeological interest.	The following statement should be added to Para 23.3 in Delivering the Vision: The presence of heritage assets with archaeological interest which are potentially of national importance may be a constraint on the extent and/or design of development in some areas of the settlement. Proposals will be subject to an appropriate heritage assessment, and any necessary mitigation measures.		

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211055	Mr Matthew Wood	Hertfordshire County Council				Bovingdon Place Strategy	Section 24	24	Supporting	Yes	Yes		The policy approach and Bovingdon Place strategy respond positively to representations previously made by HCC which is supported as a consequence.		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.
617777	Maggie Campbell		617775	Mr James Pitt	Gleeson Strategic Land	Bovingdon Place Strategy	Chapter 24	24	Objecting	Yes	No		Consider the Core Strategy unsound because it is not justified and not effective. We support the identification of Bovingdon as a settlement capable of supporting growth and indeed the	The council ideally needs to allocate additional land at Bovingdon to make the Core Strategy deliverable and this should include the land off Newhouse Road known as Duck Hall Farm or provide flexibility	Yes, I wish to participate at the oral examination	We control one of the principal alternative sites which is capable of delivering the required growth for the village as

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												<p>comments that are made regarding the sustainability of the settlement. Moreover, we support the need for development to be located at Bovingdon and therefore the comments made within the local objectives. However, we do not believe the allocation at Chesham Road is the most appropriate location for development due to its distance from the village centre and indeed its relationship with the existing village.</p> <p>Paragraph 24.2 identifies the need for a residential care home within the village and the land off Newhouse Road, known as Duck Hall Farm is best placed to deliver not only the required housing for Bovingdon, but also associated community benefits, including allotments and a residential care home.</p> <p>The proposed allocation at Chesham Road has a number of specific on site issues, which have not been considered properly and which will impact upon its deliverability.</p>	<p>within the emerging allocation to allow the deliverability of alternative sites should Chesham Road site not come forward as anticipated.</p>		<p>well as the proposed residential care home.</p>	
501874		E.J. Hillier Will Trust	398719	Ms Jo Emmett	Hives Planning	Bovingdon Place Strategy	24 Bovingdon Place Strategy - Local Objectives	24	Objecting	Yes	No	a) Justified	<p>The strategy for Bovingdon is to provide around 130 new homes. This is not sound, as it does not provide for any degree of even natural population growth in the village (it only allows for 'stable population' i.e. growth relating to household formation) - less still does it accommodate any needs of the neighbouring rural communities (see representations to Policy CS11Table 1). It is agreed that the capacity for additional housing within the village is limited - hence there is a need to identify more housing (than the 60 which is currently proposed) as part of a greenfield extension to the village.</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>	<p>Yes, I wish to participate at the oral examination</p>	<p>To enable a full discussion of the issues raised and assist the Inspector in responding to these, as appropriate.</p>

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607445	Mrs Joanna Owens					Paragraph	Local Objectives	24.1	Objecting	Yes	No	a) Justified	<p>Bovingdon Village has quite enough housing. An additional 103 houses between 2006 and 2031 will mean a great deal more traffic. Parking in the village is already a problem and the extra houses will mean at the very least another 103 cars and probably a lot more. There is already extreme pressure on local services. We are a village and another housing estate will do nothing to enhance the area. Traffic at busy times on the B4505 already entails long queues when trying to exit on to the A41 at the bottom of Box Lane. This problem will be exacerbated.</p> <p>Proposal LA6 states that "impact on local road network will be mitigated through promotion of sustainable travel options". I should like to know what these are and how this squares up with withdrawal of the Tiger Line Bus Service along Chesham Road?</p>		No, I do not wish to participate at the oral examination	
610618	Miss Lindsey Coates	The Mount Residents Association				Paragraph	Local Objectives	24.1	Objecting	Yes	No	a) Justified	<p>Local Objectives - Open Space</p> <p>We are not objecting to the creation of new open space per se, but in this case, to the way in which the strategy states it will be provided. The development of the local allocation of 60 new homes in this area seems unlikely to provide new open space. Open green amenity space already exists here directly behind Mitchell Close, this is clearly identified on p.129 Green Space Strategy 2011-16, running behind and parallel to Mitchell Close. This space as indicated in the Green Space Strategy, as a minimum, should be protected as green open</p>	<p>Local Objectives - Open Space</p> <p>This land should contain as little development as possible and should instead be the site for (a combination of semi natural green space, amenity green space, as well as provision for children and potentially allotments) -a wildlife reserve / area / garden- for nature and perhaps educational purposes, a playground and green amenity space.</p> <p>Local Objectives - Housing</p> <p>130 houses are not required. Any new housing should be at a much</p>	No, I do not wish to participate at the oral examination	

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													<p>amenity space and added to/enlarged.</p> <p>This piece of land is not large enough for 60 houses, let alone 60 houses and a piece of open land. There are 58 houses on the Mount Estate on an area that is more than double the size of the land available on the site allocated for development. The allocated site has been used as amenity space by local residents from both sides of the Chesham road for along time and significant development of this area would in reality remove/ reduce amenity space for local residents rather than increase it as (section 24) the Bovington Place Strategy suggests.</p> <p>This allocated site runs parallel with a green /biodiversity corridor (Molyneaux Ave) and we assert, based on continued observations over time, is in fact an integral key part of the wildlife corridor. In line with policy CS26 ('strengthening biodiversity corridors' and 'supporting a greater range of uses of urban green spaces') this land should contain as little development as possible and should instead be the site for (a combination of semi natural green space, amenity green space, as well as provision for children and potentially allotments) - a wildlife reserve / area / garden- for nature and perhaps educational purposes, a playground and green amenity space.</p> <p>Dacorums Play Strategy was created in 2007 based on consultation with local residents,</p>	lower level, and be created through infill.		

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													<p>children and YP.</p> <p>The Green Space Strategy states that it will adopt and implement the five key 'play priorities' identified in the Play Strategy. These include:</p> <p>2. Increasing the number of play areas so that there is less distance to travel between each.</p> <p>4. Improving access to local woodlands and nature areas. This priority links to making it easier to get to the countryside.</p> <p>Page 136 of the Green Space Strategy states: "Bovingdon has no allotments and is clearly deficient. It is not realistic to expect people to travel from Bovingdon to the other settlements to access allotments and therefore this deficiency should be considered as part of any expansion of green space planned for the village."</p> <p>The Green Space Strategy states "Bovingdon has a significant under provision of open spaces and lacks allotments, green corridors, parks, garden and space for children and young people" (p.129). We believe the Core Strategy should have a stronger emphasis on supporting what of these green spaces already exist and developing more of these in places that are appropriate, in line with Green Space Strategy (2011), Policy 3 - 'To create attractive, sustainable, accessible and well managed green spaces'.</p>			

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													<p>Local Objectives - Housing</p> <p>Paragraph 24.2 - which states that "additional housing is required to maintain its long term population and to ensure the continued viability of local services and facilities". The village is large enough to be sustainable - the population is sufficient to sustain a healthy range of local services and facilities. The rising cost of petrol will also mean that local services will be in future increasingly utilised by villagers and surrounding local residents.</p> <p>If the borough council is concerned about the viability of local services and facilities then we would suggest that they should have worked harder to avoid Tesco coming to the village, which based on the introduction of Tesco's in other areas, will no doubt have a significantly greater negative impact upon existing shops and services in the area, thereby reducing options for local residents, and reducing the character of the village. This spot at the top of the high street would have been ideal for the development of affordable housing, close to school and local shops and services.</p> <p>There is already over capacity at the school (with local children not being able to attain a place at their local school), and high street shops and services are viable and successful . 130 houses is simply too large a number for Bovingdon to absorb. We can see</p>			

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													<p>that possibly a small amount of affordable housing is required (over the next 30 years) at a much lower level than is suggested.</p> <p>Transportation is a key issue in the village and higher number of residents will simply exacerbate this issue, making it essential in our view that any development be located as close to the high street as possible. The reference in paragraph 24.5 - in the meantime, the focus will continue to be upon traffic management and encouraging a higher level of trips by non-car modes. We have seen no evidence of local residents being encouraged to travel sustainably and wonder how this can be considered to have been a 'focus' of the councils attempts to reduce the transport issues of the village. There are no cycle parking spaces in obvious evidence in the high street, except a small number of spaces outside the library (which largely seemed to be filled with scooters during the school day), and the school (as far as the school office staff are aware) has none - which seems like a missed opportunity given that it is at school start and end time that traffic problems are at their worst. The school should have been, and should continue to be, a main focus for community sustainable travel activities. There is no evidence on the schools website of its participation in the promotion of sustainable or active travel at the school. In trying to improve the traffic situation on the high street, a school travel policy for the school would seem to be a good start.</p>			

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													The village has a very poor PTAL score, with inadequate public transport and no cycling infrastructure - it is simply not in a position to absorb extra homes / residents with journey levels and mode share the way it is.			
619648	Miss Samantha Vogel					Paragraph	Local Objectives	24.1	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>The " Local Objectives " listed are in the main unrealistic. Whilst 130 new homes could be provided between 2008 and 2031, it is unclear how these will "safeguard the unique employment uses, such as Bovingdon Brickworks and HMP The Mount" as both of these employers, as far as I am aware, do not need further houses build within the village to maintain there employee levels.</p> <p>Extra housing will inevitably result in more traffic in and around the village as those occupying these houses travel to and from work as Bovingdon does not have employment for all of these extra families being offered housing. It is also likely to put a strain on the local primary school and/or cause children to be transported out of the area if they are unsuccessful in securing a place at the village primary school - again adding to the traffic in and around the village.</p> <p>Extra housing will most certainly add to the parking issues along the High Street due to the extra volume of traffic that will be produced by these new residents and therefore adding to the traffic in and around the village.</p>	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	
6196	Mrs					Paragraph	Local Objectives	24.1	Objecting	No	No	a)	It is not sound because it is not	I believe that to make the Core	No, I do not	

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49	Lorraine Vogel								g			Justified	<p>Justified or Effective.</p> <p>The " Local Objectives " listed are in the main unrealistic. Whilst 130 new homes could be provided between 2008 and 2031, it is unclear how these will "safeguard the unique employment uses, such as Bovingdon Brickworks and HMP The Mount" as both of these employers, as far as I am aware, do not need further houses build within the village to maintain there employee levels.</p> <p>Extra housing will inevitably result in more traffic in and around the village as those occupying these houses travel to and from work as Bovingdon does not have employment for all of these extra families being offered housing. It is also likely to put a strain on the local primary school and/or cause children to be transported out of the area if they are unsuccessful in securing a place at the village primary school - again adding to the traffic in and around the village.</p> <p>Extra housing will most certainly add to the parking issues along the High Street due to the extra volume of traffic that will be produced by these new residents and therefore adding to the traffic in and around the village.</p>	<p>Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.</p>	wish to participate at the oral examination	
619650	Mr Donald Vogel					Paragraph	Local Objectives	24.1	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>The " Local Objectives " listed are in the main unrealistic. Whilst 130 new homes could be provided between 2008 and 2031, it is unclear how these will "safeguard the unique employment uses, such as Bovingdon Brickworks and HMP The Mount" as both of these</p>	<p>I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future</p>	No, I do not wish to participate at the oral examination	

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													<p>employers, as far as I am aware, do not need further houses build within the village to maintain there employee levels.</p> <p>Extra housing will inevitably result in more traffic in and around the village as those occupying these houses travel to and from work as Bovingdon does not have employment for all of these extra families being offered housing. It is also likely to put a strain on the local primary school and/or cause children to be transported out of the area if they are unsuccessful in securing a place at the village primary school - again adding to the traffic in and around the village.</p> <p>Extra housing will most certainly add to the parking issues along the High Street due to the extra volume of traffic that will be produced by these new residents and therefore adding to the traffic in and around the village.</p>	sustainability of this identified site.		
610618	Miss Lindsey Coates	The Mount Residents Association					Bovingdon Vision Statement	Statement Vision 7	Supporting	Yes	Yes		<p>The vision states " Existing wildlife and biodiversity resources on the outskirts of the village are protected". We believe this is a very important and should be included as part of the vision.</p> <p>We would suggest that it should be given higher regard/ or higher priority, particularly with regard to the location of proposed developments. And, in particular, consider that the decision to build on land between Chesham road/ Molyneaux Avenue would be incompatible with this vision.</p>			
610618	Miss Lindsey Coates	The Mount Residents Association				Paragraph	Paragraph 24.2	24.2	Objecting	Yes	No	a) Justified	<p>This location / allocate site runs parallel with a green /biodiversity corridor and is in fact, based on continued observations over time, an integral and key part of the</p>	<p>This land should contain as little development as possible and should instead be the site for (a combination of semi natural green space, amenity green space, as</p>	<p>No, I do not wish to participate at the oral examination</p>	

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													<p>wildlife corridor. This piece of land has been largely untouched for a period of approximately 20 years and as a result the habitat contains many wildflowers, and berry producing trees and shrubs, and therefore supports a large insect population and subsequently populations of mammals and resident and migrating birds and mammal species, including hedgehogs, foxes, deer, frogs, newts*, butterflies, swifts, and owls, as well as protected species such as bats. The presence of the body of water (balancing tank) also increases the biodiversity value of this piece of land. (* the species of newts are as yet unidentified).</p> <p>This piece of land is not large enough for 60 houses, let alone 60 houses and a piece of open land. There are 58 houses on the Mount Estate on an area that is more than double the size of the land available on the site allocated for development. Development of this number of houses in such a small space would necessitate very little footpath, drive way and parking space. This would lead to increased pressure on surrounding roads for parking spaces. The surrounding roads have no capacity to absorb extra cars, given that the prison employees and visitors already park along Molyneaux Avenue and on the beginning of Lancaster Drive behind the Officers Social club, creating a narrow one way bottle neck. This already has safety and disability discrimination implications in the form of cars parking over dropped curbs (which represent the only pedestrian entrance and exit to the Mount Estate). Residents also have concerns re access to the estate for emergency services should this ever be necessary.</p>	<p>well as provision for children and potentially allotments) -a wildlife reserve / area / garden- for nature and perhaps educational purposes, a playground and green amenity space.</p> <p>Any development should only take place after full biodiversity studies, and off setting plans have been developed.</p>	n	

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													<p>Further housing in this area would exacerbate these already existing problems. With plans for the Mount to expand - we would suggest there is absolutely no capacity for extra parking demand and car travel.</p> <p>The space available for development on the allocated site is less than it appears / as is represented in figure 26 (map contained in the Bovingdon Place strategy) as the balance tank takes up a considerable chunk of land. As we understand it this balance tank is essential and has to remain there to collect excess water from run off of the airfield and reduce likelihood of flooding of the Moodie estate and other areas. We consider that further development at this side of the Chesham road can only exacerbate water run off and therefore the flooding issues . Any new houses themselves would likely be subject to the risk of flooding and may increase the likelihood of flooding to surrounding areas.</p> <p>The allocated site runs parallel with a green /biodiversity corridor (Molyneaux Ave) and we assert, based on continued observations over time, is in fact an integral key part of the wildlife corridor. In line with policy CS26 ('strengthening biodiversity corridors' and 'supporting a greater range of uses of urban green spaces') this land should contain as little development as possible and should instead be the site for (a combination of semi natural green space, amenity green space, as well as provision for children and potentially allotments) - a wildlife reserve / area / garden- for nature and perhaps educational purposes, a playground and green</p>			

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													<p>amenity space.</p> <p>Dacorums Play Strategy was created in 2007 based on consultation with local residents, children and YP. The Green Space Strategy states that it will adopt and implement the five key 'play priorities' identified in the Play Strategy. These include:</p> <p>No.2. Increasing the number of play areas so that there is less distance to travel between each.</p> <p>No.4. Improving access to local woodlands and nature areas. This priority links to making it easier to get to the countryside. (2011, p.22)</p> <p>The Green Space Strategy states "Bovingdon has a significant under provision of open spaces and lacks allotments, green corridors, parks, garden and space for children and young people" (p.129). We believe the Core Strategy should have a stronger emphasis on supporting what of these green spaces already exist and developing more of these in places that are appropriate, in line with Green Space Strategy (2011), Policy 3 - 'To create attractive, sustainable, accessible and well managed green spaces'.</p> <p>We understand this piece of land was selected over others for development for two key reasons: 1) the majority of consultation respondents were in favour of this site and 2) because it fits with planning policy with regard to maintaining strong green belt boundaries.</p>			

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													<p>With regard to these points-</p> <p>1) Earlier consultation on the site allocations was unfortunately not responded to by residents of the Mount Estate, and perhaps not from any or very few residents from this (the Mount side) side of the village. It seems many Mount Estate residents were unaware of developments and several expressed concern on discovery that they had missed the opportunity to put forward their opinion on the matter. The consultation comments and stakeholder participation that forms the evidence base for this area of the core strategy can therefore not be considered to be representative of village opinion, and is therefore not robust. Residents responding we believe were largely from central and south and east sides of the village. The stakeholder participation process in development of the core strategy we would therefore assert was lacking in terms of engagement with local residents who were closest to those areas considered for development.</p> <p>2) Although we understand and fully support the policy of maintaining strong greenbelt boundaries we feel the question must be asked as to what the purpose and function of green belt actually is. Six purposes for the greenbelt are listed in PPG2 (Green belts). We suggest that two of these six actually support the development of houses at Duckhall farm as opposed to Chesham Road / Molyneaux.</p> <p>a) to secure nature conservation interest</p> <p>b) To retain attractive landscapes,</p>			

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													<p>enhance landscapes, near to where people live</p> <p>We argue that siting 60 dwellings on the selected site (Chesham road) will destroy an area with a higher biodiversity and wildlife value that an agricultural field, which derives most of its biodiversity value from its hedgerows. The land between Chesham Road and Molyneaux has been largely untouched for 20 years and therefore is of incomparable value when compared to agricultural land. Therefore to site the housing on Chesham road, as opposed to Duckhall farm (or possibly another site), would defeat the object of safeguarding the country side from encroachment, in terms of nature conservation.</p> <p>This is an instance we feel, where to breach the green belt boundary would actually be consistent with the function of the greenbelt - it would be better for biodiversity, wildlife and the character of the village, and we suggest that in line with PPG3 (Affordable housing, March 1992) the local planning authority should take a decision to be flexible with green belt boundaries.</p> <p>It should also be noted that the Sustainability Report produced by Halcrow deemed that the land at all four sites / options were of equal biodiversity value. This was a desk based study and was clearly a decision made by individuals who had never physically visited the land. We would therefore question the credibility of this element of research report and the robustness of the evidence base used to make this decision to choose this land as the allocated</p>			

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													site for development.			
619648	Miss Samantha Vogel					Paragraph	24.2	24.2	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>Whilst agreeing with the opening sentence of this section, I do not believe that the proposed development on the edge of the village to the north of Chesham Road, east of Molyneux Avenue will contribute to the list of " Local Objectives" other than to provide new homes. The area of public open space will be less than is presently available and is so far away from the village that I do not believe that it would be used by the majority of Bovingdon residents or indeed used at all. There is a small area of public open space including a small children's playground located in Old Dean and this is rarely used. With this site located much closer to the heart of the village why would Dacorum Council believe that an open space located on the outskirts of the village be used at all. This earmarked development location I believe would be unsuitable for a residential care home for the elderly due to the distance from the village and an ineffective way of trying to preserve the vibrancy of the village centre. I am presuming that some of these residents may have mobility issues and should they wish to use the shops within the village centre that they may need to be transported which again will add to the congestion and parking in and around the village. The suggestion of allotments on this site would possibly be more justified due to them being able to be used by local Bovingdon residents and putting this land to much more of a communal and sustainable use.</p>	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	

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619649	Mrs Lorraine Vogel					Paragraph	24.2	24.2	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. Whilst agreeing with the opening sentence of this section, I do not believe that the proposed development on the edge of the village to the north of Chesham Road, east of Molyneux Avenue will contribute to the list of " Local Objectives " other than to provide new homes. The area of public open space will be less than is presently available and is so far away from the village that I do not believe that it would be used by the majority of Bovingdon residents or indeed used at all. There is a small area of public open space including a small children's playground located in Old Dean and this is rarely used. With this site located much closer to the heart of the village why would Dacorum Council believe that an open space located on the outskirts of the village be used at all. This earmarked development location I believe would be unsuitable for a residential care home for the elderly due to the distance from the village and an ineffective way of trying to preserve the vibrancy of the village centre. I am presuming that some of these residents may have mobility issues and should they wish to use the shops within the village centre that they may need to be transported which again will add to the congestion and parking in and around the village. The suggestion of allotments on this site would possibly be more justified due to them being able to be used by local Bovingdon residents and putting this land to much more of a communal and sustainable use.	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	
619650	Mr					Paragraph	24.2	24.2	Objecting	No	No	a) Justified	It is not sound because it is not	I believe that to make the Core Strategy sound another site	No, I do not wish to	

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	Donald Vogel											d	<p>Justified or Effective.</p> <p>Whilst agreeing with the opening sentence of this section, I do not believe that the proposed development on the edge of the village to the north of Chesham Road, east of Molyneux Avenue will contribute to the list of " Local Objectives" other than to provide new homes. The area of public open space will be less than is presently available and is so far away from the village that I do not believe that it would be used by the majority of Bovingdon residents or indeed used at all. There is a small area of public open space including a small children's playground located in Old Dean and this is rarely used. With this site located much closer to the heart of the village why would Dacorum Council believe that an open space located on the outskirts of the village be used at all. This earmarked development location I believe would be unsuitable for a residential care home for the elderly due to the distance from the village and an ineffective way of trying to preserve the vibrancy of the village centre. I am presuming that some of these residents may have mobility issues and should they wish to use the shops within the village centre that they may need to be transported which again will add to the congestion and parking in and around the village. The suggestion of allotments on this site would possibly be more justified due to them being able to be used by local Bovingdon residents and putting this land to much more of a communal and sustainable use.</p>	needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	participate at the oral examination	
610618	Miss Lindsey	The Mount Residents Association				Paragraph	24.3	24.3	Objecting	Yes	No	a) Justified	Supporting: Paragraph 24.3 states that _		No, I do not wish to participate	

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	Coates												<p>outdoor leisure space will be protected' . We think this is essential in a village that is bereft of all types of green space (Green Space Strategy 2011-16). And suggest that in particular, in relation to Bovingdons local allocation site (Chesham road) that it is crucial that as a minimum the strip of green amenity space that currently runs parallel with the back of Mitchell Close is maintained and expanded. (Green Space Strategy, 2011, p.129).</p> <p>Objecting:</p> <p>24.3 states - "New development will maintain the distinctive character of the village..." Any development on the Chesham road will essentially extend' the village and may give the appearance of sprawl (contrary to policy CS2 B(d) respect local character and landscape context). Other areas previously suggested for development would have been hidden from view from the main arterial routes through the village, and would therefore have minimal impact on village appearance and character. There appears to be no acknowledgement of this through the core strategy - despite many references to the importance of maintaining the character and appeal of the village.</p> <p>We are also very concerned that the nature of the design and appearance of these houses, if 60 are to be squeezed onto a small parcel of land, they will not be in character with the Mount Estate and certainly not with the housing that is visible along the Chesham Road. It would not be possible to build 60 dwellings on this piece of land and</p>		at the oral examination	

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													have it 'maintain the distinctive character of the village'.			
502874	Mr Chris Bearton	Hertfordshire County Council				Paragraph	24.3	24.3	Objecting	No	No		The area around Church Street, Church Lane and Bury Farm has been identified as the medieval core of the settlement. This area possesses high potential for the presence of heritage assets of archaeological interest, particularly relating to the medieval and Roman periods. Duckhall and Honours Farm are likely to be of medieval or early post-medieval origin.	The following statement should be added to Para 24.3 in Delivering the Vision: There is potential for the presence of heritage assets of archaeological interest . Proposals will be subject to an appropriate heritage assessment, and any necessary mitigation measures.		
619648	Miss Samantha Vogel					Paragraph	24.4	24.4	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. The local shopping and service role of the village centre is currently being threatened by the imminent arrival of Tesco Express with local residents and passing traffic having access to a "cheaper" alternative to prices offered in the village centre. Bringing new families into Bovingdon Village does not seem an effective way of ensuring that the village centre remains viable when the objection to the building of Tesco's on this point was overturned. The location of the development proposed at Chesham Road / Molyneux Avenue cannot be justified as a way to keep the village centre role maintained when in the current financial climate families are looking for the cheapest not nearest options and will travel outside of the village centre to achieve. Bovingdon Brickworks and the HMP The Mount do not rely currently on local residents for their vacancies, so I believe this is also an unjustified element of the core strategy proposal.	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	

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619649	Mrs Lorraine Vogel					Paragraph	24.4	24.4	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. The local shopping and service role of the village centre is currently being threatened by the imminent arrival of Tesco Express with local residents and passing traffic having access to a "cheaper" alternative to prices offered in the village centre. Bringing new families into Bovingdon Village does not seem an effective way of ensuring that the village centre remains viable when the objection to the building of Tesco's on this point was overturned. The location of the development proposed at Chesham Road / Molyneux Avenue cannot be justified as a way to keep the village centre role maintained when in the current financial climate families are looking for the cheapest not nearest options and will travel outside of the village centre to achieve. Bovingdon Brickworks and the HMP The Mount do not rely currently on local residents for their vacancies, so I believe this is also an unjustified element of the core strategy proposal.	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	
619650	Mr Donald Vogel					Paragraph	24.4	24.4	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. The local shopping and service role of the village centre is currently being threatened by the imminent arrival of Tesco Express with local residents and passing traffic having access to a "cheaper" alternative to prices offered in the village centre. Bringing new families into Bovingdon Village does not seem an effective way of ensuring that the village centre remains viable when the objection to the building of Tesco's on this point was overturned. The location of the development proposed at Chesham	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	

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													Road / Molyneux Avenue cannot be justified as a way to keep the village centre role maintained when in the current financial climate families are looking for the cheapest not nearest options and will travel outside of the village centre to achieve. Bovingdon Brickworks and the HMP The Mount do not rely currently on local residents for their vacancies, so I believe this is also an unjustified element of the core strategy proposal.			
610618	Miss Lindsey Coates	The Mount Residents Association				Paragraph	para 24.5	24.5	Objecting	Yes	No	a) Justified	Transportation is a key issue in the village and higher number of residents will simply exacerbate this issue, making it essential in our view that an development be located as close to the high street as possible. The reference in paragraph 24.5 - in the meantime, the focus will continue to be upon traffic management and encouraging a higher level of trips by non-car modes . We have seen no evidence of local residents being encouraged to travel sustainably and wonder how this can be considered to have been a 'focus' of the councils attempts to reduce the transport issues of the village. There are no cycle parking spaces in obvious evidence in the high street, except a small number of spaces outside the library (which largely seemed to be filled with scooters during the school day), and the school (as far as the school office staff are aware) has none - which seems like a missed opportunity as it is at school start and end time that traffic problems are at their worst. The school should have been, and should continue to be, a main focus for sustainable travel activities. There is no evidence on the schools website of	Needs to be more than lip service paid to sustainable travel, and it shouldn't be used as a reason for reduced parking spaces etc. without 'real' efforts being made to support and facilitate more sustainable and active travel through incentives, promotion and infrastructure development. Under local allocation 'principles' it states: A contribution must be made towards educational and community facilities'. A cycle lane on box lane would be a good use of section 106 money from any developers and should have been a requirement of Tesco's planning permission.	No, I do not wish to participate at the oral examination	

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													<p>its participation in the promotion of sustainable or active travel at the school. In trying to improve the traffic situation on the high street a school travel policy for the school would be a good start.</p> <p>In terms of pedestrian infrastructure it should also be noted that the Mount is not well served with routes into the village. Molyneaux Avenue is 'the long way round' and adds an extra 10 minutes onto journeys into the village. Between the Hyde Lane roundabout (heading west along the Chesham Road) and the entrance to the Mount, lighting is somewhere between insufficient and non-existent - as a result of these factors the majority of these trips are driven. There used to be a footpath down the side of the Mount estate (between the estate and Howard Agne Close) which is to all extents and purposes non functional now - this and other routes should be reopened and maintained by the Council if they are keen to encourage more non car journeys.</p>			
619648	Miss Samantha Vogel					Paragraph	24.5	24.5	Objecting	No	No	a) Justified	<p>It is not sound because it is not Justified or Effective.</p> <p>The Effectiveness of this point must be questioned? I agree that the village suffers from congestion compounded by on-street parking, however, how does having extra houses built on the outskirts of the village help this already growing problem. These homes are far enough away from the village centre</p>	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future	No, I do not wish to participate at the oral examination	

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619649	Mrs Lorraine Vogel					Paragraph	24.5	24.5	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. The Effectiveness of this point must be questioned? I agree that the village suffers from congestion compounded by on-street parking, however, how does having extra houses built on the outskirts of the village help this already growing problem. These homes are far enough away from the village centre to ensure that should the occupants wish to use the village centre they are more likely to drive than walk - thereby adding to this problem as opposed to providing a long term solution. The suggestion that people wishing to use the village centre would park on this development is also unjustified as this parking area is too far from the village centre to be considered a sound proposal. The volume and speed of traffic which currently use the main Chesham Road is high and the development proposed on the	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	

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619650	Mr Donald Vogel					Paragraph	24.5	24.5	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. The Effectiveness of this point must be questioned? I agree that the village suffers from congestion compounded by on-street parking, however, how does having extra houses built on the outskirts of the village help this already growing problem. These homes are far enough away from the village centre to ensure that should the occupants wish to use the village centre they are more likely to drive than walk - thereby adding to this problem as opposed to providing a long term solution. The suggestion that people wishing to use the village centre would park on this development is also unjustified as this parking area is too far from the village centre to be considered a sound proposal. The volume and speed of traffic which currently use the main Chesham Road is high and the development proposed on the Chesham Road / Molyneux Avenue Site will add to this increasing problem. The mini-roundabout leading to Hyde Lane is an accident waiting to happen and an effective way of reducing this risk should be considered as a matter of urgency.	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	
595378	Mrs Kathleen Banks					Local Allocation. Chesham Road, Bovingdon	LA6	Table LA6	Objecting	Yes	No		The proposal is generally supportive. However there are drainage problems with this site and I consider that the principles should contain reference to the necessity for ensuring that this problem will be adequately dealt with.		No, I do not wish to participate at the oral examination	

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498429	Steve Baker	CPRE - The Hertfordshire Society				Local Allocation. Chesham Road, Bovingdon	LA6	Table LA6	Objecting	Yes	No	a) Justified	It is not sound because it is not Justified, Effective or Consistent with national policy. Local Allocation 6 should be removed from the Core Strategy. The removal of the land from the Green Belt is not justified by exceptional circumstances as required by national Green Belt policy. The allocation is not required to meet housing targets for the borough.	LA6 should be delted from the text and Figure 26.	No, I do not wish to participate at the oral examination	
611688	Mr Matthew Kay	Ministry of Justice				Local Allocation. Chesham Road, Bovingdon	Policy LA6 Local Allocation. Chesham Road, Bovingdon	Table LA6	Supporting	Yes	Yes		Dacorum Borough Council has allocated Proposal LA6 in the Bovingdon Place Strategy located at Chesham Road / Molyneux Avenue. This Representation is submitted in support of this allocation and also in support of the Bovingdon Place Strategy. Bovingdon Place Strategy, which forms Section 24 of the Pre-Submission Core Strategy, requires as part of the vision for Bovingdon that there be new housing. Paragraph 24.2 states: –additional housing is required to maintain its long term population and to ensure the continued viability of local services and facilities. We consider that the development of the site allocated as LA6 (also referred to as -Land North of Chesham Road, Bovingdon)) would be beneficial for the village of Bovingdon in providing extra development capacity in line with the Vision and Local Objectives of the Bovingdon Place Strategy. As such we support the allocation of this site. Site Area – The site is located to	We consider that the allocation of Site LA6 - Chesham Road, Bovingdon - should be retained.	Yes, I wish to participate at the oral examination	This representation is not seeking a change but we are willing to participate at the oral examination if required in support of this allocation.

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													<p>the north west of Bovingdon to the north of Chesham Road and is illustrated on the Site Area Plan attached to this Representation (Site area is 2.6 Hectares). The site currently comprises of unused grass and scrubland with a significant number of trees dotted through the site and located along all boundaries.</p> <p>Site Constraints – The two main site constraints that impact on this site are:</p> <p>Molyneux Avenue – This road defines the western boundary of the site and provides access to the prison facility HMP The Mount. Molyneux Avenue already links to Lancaster Drive, servicing a number of private dwellings. The prison has current concerns with parking on Molyneux Avenue due to staff and visitors to the prison. There would therefore be no obstacle to development were Molyneux Avenue to be adopted by the Highway Authority in future.</p> <p>Balancing Pond – A balancing pond is located on part of the site. The Environment Agency has an interest in overseeing the quality of the water passing into the balancing pond. .</p>			

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													<p>Effects of such constraints – MoJ proposes to work with the potential residential developer and all stakeholders to ensure that the balancing pond and Molyneux Avenue continue to meet all current and future relevant standards and will work towards the adoption of this infrastructure by the relevant statutory bodies.</p> <p>Landscape Strategy proposed – The Site Capacity is for approximately 60 residential units as set out on the Illustrative Layout included in the attached Feasibility Report, demonstrating the development potential of this site. The Illustrative Layout splits the site into 5 plots, although no phasing of site development has been considered necessary.</p> <p>Development Impact – The site has a low development impact and has limited Green Belt impact as it is immediately to the south of HMP The Mount and immediately to the west and north of the existing settlement boundary. The western boundary of the site is an existing access road, therefore providing the site overall with a defensible boundary and strong definition. The site's relationship to the surrounding built form is such that it contributes little to the openness of the Green Belt and its amenities.</p> <p>We therefore consider that it is less sensitive a site to develop than other development options for the settlement of Bovingdon, and due to</p>			

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													<p>its containment does not pose a risk of urban sprawl. The Feasibility Report for the development of the site (attached to this Representation) states -Such is the extent of existing boundary planting that new development at the site, of a moderate density, would not have any material visual impact on the housing areas to the south and east, the prison to the north or the former airfield to the west. The only visually sensitive boundary according to the study is the northeast, where impact to properties off Mitchell Close could be largely mitigated through boundary treatments and a careful site layout.</p> <p>Viability – A viability analysis has been undertaken and as landowner the MoJ is satisfied that the site is both viable and desirable to develop. The Land Ownership of the site is illustrated on the Land Ownership Plan attached to this Representation.</p> <p>Overall – We consider that this site is viable and deliverable and is the first choice option for providing residential development capacity in line with the objectives of the Bovingdon Place Strategy. We therefore strongly support Local Allocation LA6 and also support the Bovingdon Place Strategy.</p> <p>Attachments Accompanying this</p>			

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													Representation: Site Area Plan Landownership Plan Feasibility Report			
617777	Maggie Campbell		617775	Mr James Pitt	Gleeson Strategic Land	Local Allocation. Chesham Road, Bovingdon	LA6	Table LA6	Objecting	Yes	No	a) Justified	<p>The core strategy is unsound because it is not justified and is not effective.</p> <p>Whilst we support the identification of Bovingdon as a settlement capable of supporting growth, we do not believe the allocation at Chesham Road is the most appropriate location for development due to its distance from the village centre and indeed its relationship with the existing village. Moreover, it is not capable of delivering the level of facilities and services, including a residential care home that the village needs.</p> <p>The proposed allocation at Chesham Road has a number of specific on site issues, which have not been considered properly and which will impact upon its deliverability.</p> <p>We consider that the location of this site away from the key facilities of the village runs against the key aims identified for Bovingdon from undertaken technical studies and consultation, and that more weight should be given to this point accordingly within the Sustainability Appraisal. The key issues identified within the Bovingdon Spatial Strategy identify traffic congestion and parking shortages along the high street as well as nothing a poor/shortage of access by foot and on bicycle around the village as that of key issues. The use of this site</p>	<p>The land off Newhouse Road, known as Duck Hall Farm should be the preferred allocation as it is able to deliver the required level of housing and associated community benefits, including allotments and a residential care home.</p> <p>In conclusion, to allow the Core Strategy to continue as a deliverable document and indeed be founded on a robust and credible evidence base we consider that the proposed allocation LA6 (land off Chesham Road) needs to be replaced by the Duck Hall Farm site, as this offers an excellent opportunity for sustainable development with it having a high accessibility level to the village centre of Bovingdon. The site would allow the opportunity to secure affordable housing as well as open space within a central location, both of which are identified within the key issues as being in shortage in Bovingdon. There is also the potential for the site to be of a mixed use nature, with community facilities forming part of any development in addition to the residential and open space elements, including allotments. Such community facilities would be strategically placed by virtue of the centre location to the village centre.</p>	Yes, I wish to participate at the oral examination	We control the principal alternative sites which is capable of delivering the required growth for the village as well as the associated community benefits, including allotments and a residential care home.

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													for residential development is likely to generate a higher level of trips by private motor car within the village centre due to potential future residents being more reliant on the use of car than if development were located at Duckhall Farm due to the acknowledged limited cycling/walking facilities in the village.			
619648	Miss Samantha Vogel					Local Allocation. Chesham Road, Bovingdon	LA6	Table LA6	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. My family and I are passionate about ensuring tht Bovingdon remains a vibrant compact village, offering a high quality of life for local residents and businesses, however, we believe that Proposal LA6 under Dacorum's Core Strategy is both unjustified and non-effective due to the points raised above and therefore brings into question the Soundness of the current proposal.	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	
619649	Mrs Lorraine Vogel					Local Allocation. Chesham Road, Bovingdon	LA6	Table LA6	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. My family and I are passionate about ensuring tht Bovingdon remains a vibrant compact village, offering a high quality of life for local residents and businesses, however, we believe that Proposal LA6 under Dacorum's Core Strategy is both unjustified and non-effective due to the points raised above and therefore brings into question the Soundness of the current proposal.	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.	No, I do not wish to participate at the oral examination	
619650	Mr Donald Vogel					Local Allocation. Chesham Road, Bovingdon	LA6	Table LA6	Objecting	No	No	a) Justified	It is not sound because it is not Justified or Effective. My family and I are passionate about ensuring tht Bovingdon remains a vibrant compact village, offering a high quality of life for local	I believe that to make the Core Strategy sound another site needs to be identified for the planned 60 houses for the reasons stated above. The open space could be achieved by using the Chesham Road / Molyneux	No, I do not wish to participate at the oral examination	

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													residents and businesses, however, we believe that Proposal LA6 under Dacorum's Core Strategy is both unjustified and non-effective due to the points raised above and therefore brings into question the Soundness of the current proposal.	Avenue site for allotments and this would seem to be a more justified and effective proposal with direct benefit to the residents of Bovingdon and ensuring the future sustainability of this identified site.		
501874		E.J. Hillier Will Trust	398719	Ms Jo Emmett	Hives Planning	Local Allocation. Chesham Road, Bovingdon	LA 6 Bovingdon Place Strategy	Table LA6	Objecting	Yes	No	a) Justified	<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> <p>The proposed allocation of land north of Chesham Road (LA6) is not sound: it is not sufficiently large, and is too constrained by physical factors, to deliver all the elements above (including total number of homes, care home, open space, allotments, etc) as set out in the vision for Bovingdon. Further, whilst the Parish Council appear to offer their support to the site it is conditional upon a number of factors -including delivery of specialist accommodation for the elderly and "on or off site amenity space". Clearly if open space must be provided off site, because it cannot be provided on site, and it is a requirement of the development, the site is not a suitable one to</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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													<p>accommodate the development required! The site north of Chesham Road does not appear able to meet these conditions and as such the support of the Parish Council for this site must be questioned.</p> <p>Mindful of our view that the total housing provided in Bovingdon should be greater (set out in our objections to Policy CS17), the site at Grange Farm could deliver a greater provision of housing, including affordable housing, along with the other elements sought by the Borough and Parish Councils (as indicated on the attached plan). It would therefore be the most appropriate strategy when considered against the reasonable alternatives, and would be 'sound'.</p> <p>Therefore, the identification of land at Chesham Road, and the failure to identify land at Grange Farm, to meet the development needs of Bovingdon makes the submitted strategy unsound. We say this for the following reasons (addressing also the Core Strategy Background Paper 'Assessment of sites for Local Allocations'):</p> <p>In general in Bovingdon, the Highways Agency note that a change in attitude to travel is required to alleviate the current levels of traffic congestion experienced in the village, and that a key strategy for the village will be to design new development to maximise use of sustainable transport modes. LA6 will not help to achieve such a change in attitude, as the routes to local services and facilities for non-car modes of transport are not attractive: they involve crossing a major road. This is acknowledged in the assessment of the Chesham</p>			

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													<p>Road site ("there is a busy road separating the site from the village centre which may pose an accident risk and could discourage the elderly, disabled people and children from moving around freely in the area"). In contrast, while the absolute distance to the village centre from Chesham Road is comparable with that between the village centre and Grange Farm, in the latter instance attractive safe routes can be achieved which would better aid traffic reduction in the village.</p> <p>The overall conclusion of the assessment of the Chesham Road site acknowledges that there are "significant drawbacks" to the site. However, these do not appear to be weighted in any way, as some are significant enough to preclude any development at all at the site. These include the sites viability, and its deliverability (it is noted that the site was initially identified by Officers of the Council and that landowner interests is still unknown - this is in contrast to Volume 6 Annex A of the Consultation Report which states that the issue has been addressed). The deliverability of the site is a factor of significant weight against the site, as it cuts to the heart of the deliverability of the Bovingdon Place Strategy (and therefore the soundness of the Core Strategy).</p> <p>The assessment of the site at Chesham Road also states that its development could potentially affect the running of HMP The Mount. This should preclude development at the site taking place as there are other available, suitable and deliverable sites in Bovingdon - land at Grange Farm - which would provide for the requirements of the village without</p>			

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													<p>such potential effects.</p> <p>The Sustainability Appraisal of the site (contained within the Background Paper) concludes that the LA6 site is within a site which is approximately 60% previously developed land. This is erroneous: as is often the case with airfields, much of it is open and grassed and the effect of it being classified as 'pdl' should therefore legitimately be discounted. In any event, the area which the Council have identified under Proposal LA6 is vastly less than the remainder of the airfield and it is incorrect to refer to a 'significant proportion' of the site as being such (Officer conclusion to the assessment of land north of Chesham Road in the Background Paper).</p> <p>The Background Paper assesses a number of disadvantages to the site at Grange Farm, all of which are without foundation. For example, it is noted that the site is close to Bovingdon Green and could affect its character -Indeed, it is considered that development at Grange Farm would offer an opportunity to 'frame' the Green and provide an attractive, secondary, focus for the village. There is reference to the Moody Estate being an 'important existing boundary to the village' - although no explanation is given and in fact this boundary to the village provides no sense of entry or welcome to the village (which development at Grange Farm could achieve). Incredibly, the assessment of Grange Farm concludes that landowner interest is unknown, despite representations being made in support of the site at every stage</p>			

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													<p>of the Core Strategy production.</p> <p>The Council have, overall, consistently failed to explain why local allocation Proposal LA6 is its preferred site. The Background Paper simply sets out the perceived pros and cons of each site but fails to set out any clear planning reasons for the preference (and, as outlined above, the apparent support of the Parish Council appears to be misplaced). For the reasons above LA6 is not justified as the most appropriate strategy for the village, and the Core Strategy as drafted is unsound. Instead the most appropriate strategy is to identify land at Grange Farm as a greenfield urban extension to the village.</p> <p>It should be added at this juncture that, in earlier assessments of the site at Grange Farm, the Council considered the wrong area of land. This was drawn to their attention in representations to the Draft Core Strategy (December 2010) but the assessment of the site, as set out in the Background Paper, has not been changed. In the case of another site at Bovingdon (Duckhall Farm) an amendment was submitted to the site area and this was separately assessed in the Background Paper - however no such amended assessment has been undertaken of the amended Grange Farm site. The Council cannot therefore show that they have even assessed all reasonable alternatives in formulating the strategy for Bovingdon - let alone that the most appropriate one has been selected - as required by PPS12.</p>			

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617777	Maggie Campbell		617775	Mr James Pitt	Gleeson Strategic Land		Figure 26 Bovingdon Vision Diagram	Figure 26	Supporting	Yes	Yes		<p>We note that the Council have identified an Urban Wildlife Corridor as running through the centre of the Duck Hall Farm site.</p> <p>We believe that the protection of the environment is a key consideration in future development options and any development of the Duck Hall Farm site can incorporate this corridor and indeed improve it via proper management. Indeed, unlike the proposed allocation LA6, Duck Hall Farm is perfectly placed to improve the corridor.</p>		No, I do not wish to participate at the oral examination	
211055	Mr Matthew Wood	Hertfordshire County Council				Markyate Place Strategy	Section 25	25	Supporting	Yes	Yes		<p>The 'Delivery' section of the strategic site allocation relating to Hicks Road,</p> <p>identifies that the Borough Council will work with the County Council to identify the appropriate level of education contribution to achieve additional facilities.</p> <p>This requirement is supported, and the IDP should also ensure that other</p> <p>housing proposed in Markyate during the plan period makes the appropriate contributions towards mitigating its impacts.</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.
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Markyate Place Strategy	Markyate Place Strategy	25	Supporting	Yes	Yes		The Markyate Place Strategy is supported in principle, however it should be noted that individual development proposals and sites will need to be assessed in respect of their impact on the waste water network. Depending on the precise location and scale of development proposed, local network upgrades could be required. In addition we have concerns as to the cumulative impact of the level of development proposed in respect of the treatment capacity of Markyate STW.	N/A		
502874	Mr Chris Bearton	Hertfordshire County Council				Markyate Place Strategy	Markyate Place Strategy	25	Objecting	No	No		Markyate Place Strategy The following statement should be added to Delivering the Vision: Roman Watling Street forms the main route through the village and fords the River Ver just east of the settlement. There is potential for the presence of heritage assets of archaeological interest, particularly relating to the Roman period . Proposals will be subject to an appropriate heritage assessment, and any necessary mitigation measures. Reasons: High potential for heritage assets of archaeological			

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													interest of Roman date, particularly around the area where the Roman road crosses the Ver.			
503294	Chris Shaw	Highways Agency				Markyate Place Strategy	Section 25	25	Objecting	Yes	No	a) Justified	<p>Please see hard copy for more details.</p> <p>The Highways Agency wishes to emphasise the potential cumulative traffic impact on the A5 resulting from development in Markyate. The Strategic Site proposal for Land at Hicks Road, Markyate, incorporates a requirement for a transport assessment which considers the A5 which the Highways Agency welcomes. To safeguard the interests of the Highways Agency it is recommended that the plan incorporates additional text which clarifies, where the threshold for a Transport Assessment is surpassed in accordance with requirements set out in Appendix B of DfT's Guidance on Transport Assessment, and the 30 two-way vehicle link flow is surpassed in accordance with the Highways Agency's Protocol for Dealing with Planning Applications, that future planning applications include within their scope appropriate traffic assessment of the A5. In soundness terms, this evidence would help to justify what the impact is to the strategic road network.</p>	<p>The Highways Agency proposes the following additional text is provided within the Markyate Place Strategy:</p> <p><i>"All planning applications which meet the threshold for a Transport Assessment in accordance with requirements set out in Appendix B of DfT's Guidance on Transport Assessment, and exceeds the 30 two-way vehicle link flow in accordance with the Highways Agency's Protocol for Dealing with Planning Applications, should include within their scope appropriate traffic assessment of the A5, including, where necessary, mitigation measures to ensure that if the capacity of the A5 junctions is exceeded, that the Strategic Road Network is „no worse off“ than if the development did not take place, as specified in DfT Circular 02/2007."</i></p>	No, I do not wish to participate at the oral examination	
366491	Mr Brian Worrell					Paragraph	Local Objectives	25.4	Objecting	Yes	No	b) Effective	<p>I am always amazed at the lack of sport and leisure facilities in Markyate, a village of some size. Nowhere can I find any commitment to improve this. An opportunity to provide even basic facilities has been missed in the drive to provide homes in the redevelopment of Hicks Road.</p>	I suggest a new bullet point is added 'Provide new sport and leisure facilities for the community'		
6100	Mr	HBRC					Markyate Vision	Statem	Objecting	Yes	No	b)	The Vision could include	Add 'and farmed' to the vision		

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88	Martin Hicks							ent Vision 8	g	s		Effective	'...particularly the village centre and its setting within gently undulating open <i>and farmed</i> countryside'.	statement.		
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd		Markyate Vision	Statement Vision 8	Supporting	Yes	Yes		We support the overall vision for Markyate and agree with the important emphasis placed upon the redevelopment/regeneration of the former Hicks Road Industrial Estate. The redevelopment of the Hicks Road site provides the opportunity to deliver a number of significant benefits for the village - including the delivery of new housing (including affordable housing), new employment space, a new public square, an improved surgery along with other environmental improvements.		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).
211503	Mr Colin White	Chilterns Conservation Board					Markyate Vision Statement	Statement Vision 8	Objecting	Yes	No	c) Consistent with national policy	It is not sound because it is not Effective or 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 the public of the special qualities of the area of outstanding natural beauty But if it appears to the board that	Add: 'and as part of the setting of the Chilterns AONB' after 'Ver Valley' in line 4.	No, I do not wish to participate at the oral examination	

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													<p>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 8th February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further</p>			

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													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 Vision for Markyate on page 201 should include reference to the fact that Markyate is located immediately adjacent to and is therefore within the setting of the Chilterns AONB. The Board therefore suggests that the following be added: 'and as part of the setting of the Chilterns AONB' after 'Ver Valley' in line 4.			
211503	Mr Colin White	Chilterns Conservation Board				Paragraph	25.8	25.8	Objecting	Yes	No	c) Consistent with national policy	It is not sound because it is not Effective or 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 the public of the special qualities of the area of outstanding natural beauty But if it appears to the board that there is a conflict between those purposes, they are to attach greater	Add: 'the Chilterns AONB' after 'such as' in line 3.	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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</p>			

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													<p>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>Paragraph 25.8 should make reference to the fact that Markyate is within the setting of the Chilterns AONB. The Board suggests that the following be added: 'the Chilterns AONB' after 'such as' in line 3.</p>			
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd	Paragraph	Paragraph 25.10	25.10	Supporting	Yes	Yes		<p>We broadly support the Council's aspiration to protect the key local shopping and services function within the village centre. Furthermore, the redevelopment proposals for the Hicks Road site have been specifically designed to complement (rather than compete) with the existing retail facilities/services. However, it remains our view that the village is under-provided for in terms of retail/service facilities and the opportunity to improve the overall retail offer within the village should be explored as part of the redevelopment of the Hicks Road site. This will improve the self-containment of the village and reduce the prospect of outward commuting to meet day-to-day shopping needs.</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).
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd	Strategic Site. Land at Hicks Road, Markyate	Strategic Site SS2 - Land at Hicks Road	Table SS2	Objecting	Yes	No		<p>As per our previous representations to earlier stages of the Core Strategy, we continue to support and welcome the identification of the Hicks Road Industrial Estate as a Strategic Site for regeneration, which will accommodate/delivery the majority of the village's future growth.</p> <p>Whilst the proposals/development principles are broadly in-line with the Hicks Road Masterplan</p>	<p>In view of the above, we would encourage the Council to make the following amendments:</p> <p>bullet point 3 (Principles) - delete following text "and, where possible, to enable existing tenants to remain on site" (note: we would stress that whilst it continues to be ZBV's intention to work with the existing tenants, we do</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

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													<p>(October 2011) and the proposals set out in planning application (ref: 4/01173/11/MFA) for the redevelopment of our client's landholdings, we would make the following comments on the contents of Proposal SS2:</p> <p>whilst the overall mixed use approach and broad mix of uses is supported (and is consistent with the Masterplan proposals), it is important that the site specific requirements (including the preferred mix of uses) is applied flexibly. This flexibility will be important given the current economic climate and challenges associated with securing development financing;</p> <p>we support the increase in the number of residential units (to 90 units) within the proposed mix of uses. But again, we would emphasise the need for flexibility. In particular, it is possible that a greater number of residential units could be delivered at the site (dependent upon mix of units) - and as such, the reference to 90 units should not be seen as a 'ceiling', but rather a guide for what may be achievable. Given that the Hicks Road site is the largest brownfield site in Markyate - it is vital that it's development potential is optimised in order to accommodate as much of the village's predicted growth as possible.</p> <p>we note the reference (within the development</p>	<p>not feel it appropriate to include this text within the body of the site specific policy);</p> <p>bullet point 5 (Principles) - amend text as follows: "a mix of residential accommodation to be provided including predominantly two storey and three storey houses and apartments/flats";</p> <p>bullet point 8 (Principles) - to amend text as follows: "new public space to create a focus for the village and the River Ver to be incorporated into the scheme as a feature";</p> <p>bullet point 13 (Principles) - to amend text as follows: "De-culvert part of the River Ver (extent of de-culverting to be agreed with the Environment Agency) to create a landscaped corridor.....";</p> <p>bullet point 3 (Delivery) - delete reference to the Planning Performance Agreement - due to time constraints, this approach was not adopted on the current planning application;</p> <p>new bullet point (Delivery) - new bullet point to be added as follows: "Flood Risk: a sequential assessment has been undertaken by the majority landholder in consultation with the Environment Agency and the Council. It has been agreed between the EA and the Council that the redevelopment of the site (in</p>	<p>in the Pre-Submission Core Strategy).</p>	

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													<p>principles) to the Council's aspiration to retain existing tenants on site (where possible). As the Council will be aware, ZBV has consulted extensively with those tenants currently leasing floorspace at the site. As a result, several of the commercial units within the proposed scheme have been specifically designed to meet their business requirements. Whilst ZBV is committed to continuing to work with the existing tenants, there can be no guarantee that reasonable terms can be agreed between parties. Accordingly, it is not considered appropriate to make reference to this aspiration within the site specific policy allocation; the reference (within the development principles) to "a mix of residential accommodation to be provided including predominately two storey houses and apartments/flats" should be amended to include support for both two and three storey houses. As the Council will be aware, the current proposals for ZBV's landholding (as embodied within planning application ref: 4/01172/11/MFA) include a mix of two and three storey terrace and town houses (alongside a 3 storey apartment block). Indeed, it is pertinent to note that the existing site already includes substantial 3 storey commercial buildings and the wider</p>	<p>accordance with the above) will meet the requirements of the sequential approach/exceptions test as set out in PPS25".</p>		

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													<p>village includes a number of examples of 3 storey residential properties. The current proposals for the site have been subject to extensive urban design analysis and consultation with both Shape East and English Heritage (both of whom support the overall design approach and bulk/height/massing of the proposed houses). As a result, the inclusion of some 3 storey houses within the overall development mix is considered entirely appropriate;</p> <p>we continue to support the recognition (within the development principles) that any development should provide a maximum of 25% of residential units as affordable. As the Council will be aware, the viability assessment work completed in support of ZBV's current planning application acknowledges that (having regard to the costs of redeveloping the site), the scheme can bear a 25% affordable provision and remain viable/deliverable;</p> <p>whilst the current proposals seek to de-culvert a large portion of the River Ver (as it runs across the site), the intention is to maintain the River in its current position (rather than seeking to re-route it within the development). The River will continue to be a feature within the development (running through the pocket park and along the south side of</p>			

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													<p>Hicks Road and Sharose Court), but it is not possible to run it through the new public square (to be located on the north side of Hicks Road);</p> <p>in terms of delivery of new development/flood risk, the site specific policy should note that a sequential assessment has been undertaken in consultation with the Council and Environment Agency. Both bodies have confirmed that the development proposals meet the requirements of the sequential approach/exceptions test as set out in PPS25.</p>			
211503	Mr Colin White	Chilterns Conservation Board				Strategic Site. Land at Hicks Road, Markyate	SS2	Table SS2	Objecting	Yes	No	c) Consistent with national policy	<p>It is not sound because it is not Effective or Consistent with national policy.</p> <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</p>	Add particularly within the setting of the Chilterns Area of Outstanding Natural Beauty' at the end of the ninth bullet point.	No, I do not wish to participate at the oral examination	

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													<p>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 8th February 2012. Any further comments made at that meeting will be duly forwarded.</p> <p>Should you require any further</p>			

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													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 principles for development on page 203 should properly reflect the fact that Markyate is within the setting of the Chilterns AONB, therefore the Board suggests that 'particularly within the setting of the Chilterns Area of Outstanding Natural Beauty' is added at the end of the ninth bullet point.			
356014	Mrs Anna Parr	Environment Agency				Strategic Site. Land at Hicks Road, Markyate	SS2	Table SS2	Supporting	Yes	Yes		This strategic site may allow the river Ver to be removed from the existing culvert running through the site, which will improve the ecological value of the river and improve the existing flood risk issue. Contamination of the site will have to be addressed through re-development. The site is within Flood Zone 2 and 3 and Dacorum Borough council's functional flood plain and any development will need to be compatible with this risk.			
611689	Mrs Sheila Pilkinton					Strategic Site. Land at Hicks Road, Markyate	SS2	Table SS2	Objecting	Yes	No	a) Justified	The Employment Space Study (2005) concluded that a strong demand for B2 and B8 remained during the recession and this is likely to continue in the future. The most recent report by Roger Tym & Partners (2011) does not specifically comment on Markyate, but says 'most of the recommendations of the 2010 SW Herts Update still hold.' The Hicks Road Masterplan shows a significant increase in the site to be considered. All the properties on the South of Hicks Road, up to the High Street junction are now	All the evidence from the Parish Surveys and the experts, Roger Tym, seeks to retain those businesses that wish to continue trading in Hicks Road. The area required for this industrial use to be retained is not so great as to preclude all the other uses which are almost universally supported for the site. I would urge that the Core Strategy accepts the evidence from the participation of the local community recorded in the Parish Plan surveys and the research and fact finding that the District Council commissioned from Roger Tym and adopts their		

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													included. These are all active business premises. The Masterplan in 4.1 An Opportunity for Regeneration - offers the provision of modern business accommodation. In the Executive Summary, it does say that the developer is also committed to continuing to work with existing tenants, neighbouring land owners and the Primary Health Trust/Surgery to formulate comprehensive proposals which maximise the benefits to be delivered by the site. This is far less commitment than in SS2. Markyate has a number of long standing businesses working within the Hicks Road development site. While we would not discourage new businesses, the community of businesses that already exist albeit in unattractive premises why should they be discarded? The Core Strategy has a Hicks Road Masterplan written by the potential developer, which is far less committed to the local industries on site, included as a supporting document. Support of the Core Strategy should not necessarily mean acceptance of this Masterplan.	recommendations for Markyate Hicks Road given in their report of June 2010.		
611377		Zog Brownfield Ventures Ltd	397167	Mr Jon Roshier	Rolfe Judd Ltd		Figure 27 - Markyate Vision Diagram	Figure 27	Objecting	Yes	No		We broadly support the Markyate Vision Diagram - and in particular, the identification of the Hicks Road Strategic Site Allocation. A key objective of the Hicks Road Masterplan (and indeed the current planning application), is to create a new public square/space bounded with new retail, community and business uses. The new square will form the focus for the future development and will connect Hicks Road into the centre of the village. As a result, the Vision Diagram	The Vision Diagram should be amended to extend the 'Centre Zone' into the Hicks Road site to include the proposed public square (and neighbouring buildings).	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

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													should be amended to extend the 'Centre Zone' into the Hicks Road site to include the proposed public square (and neighbouring buildings).			Strategy).
211503	Mr Colin White	Chilterns Conservation Board					Figure 27	Figure 27	Objecting	Yes	No	c) Consistent with national policy	<p>It is not sound because it is not Effective or Consistent with national policy.</p> <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</p>	Add the AONB boundary to Figure 27.	No, I do not wish to participate at the oral examination	

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													<p>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 8th 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>Figure 27 shows Markyate and the Board considers that because the AONB plays a significant part in the setting of Markyate the AONB boundary should be added to Figure 27.</p>			

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618831	Mr Mark Mathews	Thames Water Utilities Ltd				Countryside Place Strategy	The Countryside Place Strategy	26	Supporting	Yes	Yes		A small number of the villages identified within the Countryside Place Strategy are located within Thames Water's supply area. These include Wiggington, Long Marston and Wilstone along with some of the hamlets including Ringshall and Puttenham. Any development proposed in these locations would need to be assessed on an individual basis in respect of water supply considerations, once the precise scale and location of development is known. Existing water supply infrastructure is limited in these locations.	N/A	No, I do not wish to participate at the oral examination	
211503	Mr Colin White	Chilterns Conservation Board				Countryside Place Strategy	Section 26	26	Supporting	Yes	Yes		<p>It is not sound because it is not Effective or Consistent with national policy.</p> <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>		No, I do not wish to participate at the oral examination	

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													<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 8th 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</p>			

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													<p>have implications for the Chilterns AONB and the need to conserve and enhance its natural beauty.</p> <p>Chapter 26 (countryside) is welcomed and supported fully as currently drafted.</p>			
502874	Mr Chris Bearton	Hertfordshire County Council				Countryside Place Strategy	Countryside Place Strategy	26	Objecting	No	No		<p>Countryside Place Strategy</p> <p>The following statement should be added to Delivering the Vision:</p> <p>The countryside of the Borough has produced evidence for human activity in the landscape from prehistory through to modern times. Numerous areas of high potential for the presence of heritage assets with archaeological interest have been identified. Two particularly significant areas of high archaeological potential are the area around Cow Roast, part of which is a Scheduled Monument (SM HT91), and the area around Ashridge, which contains extensive earthworks of prehistoric, Roman and Medieval origin, only a small proportion of which are Scheduled.</p> <p>The presence of heritage assets with archaeological interest which are potentially of national importance may be a constraint on the extent and/or design of development. Proposals will be subject to an appropriate heritage assessment, and any necessary mitigation measures.</p> <p>Some agricultural practices, such as forestry and cultivation associated with production of bio-fuels can be very damaging to archaeological features. Careful consideration should be</p>			

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													<p>given to the likely impact on known or potential heritage assets with archaeological interest when considering sites for new forestry and bio-fuel production.</p> <p>There may also be issues in Berkhamsted as there are a number of key junctions and links that will require mitigation measures if the level of development proposed is to be realised.</p>			
627676	Mr and Mrs Michael and Gill Glasser					Countryside Place Strategy	Section 26	26	Objecting	Yes	No	a) Justified	<p>It is unsound because it is not Justified, Effective, Consistent with national policy. We believe that our area of land, coloured pink on the accompanying plan, should be included within the village settlement boundary.</p> <p>We further believe that this site could make a useful contribution towards housing allocation within the village.</p> <p>This site is in a sustainable location, close to village amenities and in the heart of the village.</p>	We believe that the village envelope should be extended to include this site and that consideration should be given to allocating this site for sustainable local housing, particularly in light of current Government recommendations and policy.	Yes, I wish to participate at the oral examination	In order to expand and clarify in more detail our submission above.
366491	Mr Brian Worrell					Paragraph	Local Objectives	26.3	Objecting	Yes	No	b) Effective	<p>I suppose reasonably there is a need for the objective to limit the impact of equine activities on the landscape. However, a significant reason for equine activity is the lack of off road routes and circular routes which are accessible from safe areas on the busy roads. This is particularly relevant for horse carriage drivers who have to brave these roads just to access short off road rights of way. A sensible balance and joined up thinking is necessary to resolve this.</p>	I suggest bullet point five is replaced by 'Evaluate the needs of equine activities and provide facilities to balance the impact on the landscape.'		
610088	Mr Martin	HBRC				Paragraph	26.3	26.3	Supporting	Yes	Yes		Despite the inability to remove the above....I support the Vision and Objectives.			

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	Hicks															
610088	Mr Martin Hicks	HBRC				Paragraph	Countryside Local Objective	26.3	Supporting	Yes	Yes	a) Justified	Despite the inability to remove the above....I support the Vision and Objectives			
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	26.4	26.4	Supporting	Yes	No	b) Effective	We support the Borough's recognition of and various references made to the <i>active management</i> of habitats, the countryside and the natural environment, which is necessary and important for the protection and enhancement of our semi-natural habitats, landscapes and biodiversity. This is apparent in the Vision statement, paragraph 16.1 and paragraph 26.14. It must be ensured that the need for ongoing management of habitats, habitat features, Green Infrastructure assets etc, will be taken into account in planning and decision making, and in decisions relating to developer contributions.		No, I do not wish to participate at the oral examination	
626200	Mr Phillip Plato	Plato Estate Ltd				Paragraph	26.11	26.11	Objecting	Yes	No	a) Justified	It is unsound because it is not Justified, Effective or Consistent with national policy. The final sentence of paragraph 25.11 and the reference to 'mooring basins' ignores the guidance previously given to the LPA from ourselves, other mooring operators and the responsible authority for operations on the Grand Union Canal, namely British Waterways Board. Given the lack of national policy guidance on such matters and the apparent importance of the Grand Union Canal as a valuable leisure and recreational resource within Dacorum, this sentence is both confusing and inconsistent with	The following changes are proposed in order to address the comments in Box 4 above. The concluding sentence of paragraph 26.11 should be deleted and replaced with the following more positive guidance: "Appropriate, small scale recreational mooring basins and lay-bys will be supported together with appropriately site linear moorings, where adequate operational facilities can be provided, which do not damage the landscape or character of the countryside or the Grand Union Canal. The proposals for such facilities within the AONB will be judged according to the same criteria prescribed in Policy	Yes, I wish to participate at the oral examination	Plato Estates Limited has acquired the interest and assets of Cougar Enterprises Limited. Cougar Enterprises Ltd previously made representations at the Dacorum Borough Local Plan Alterations Package 1996 and gave evidence at the Public Inquiry in August 1997 alongside British Waterways and other interested parties. Our company owns

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													<p>other parts of the Core Strategy.</p> <p>It is also inconsistent with the prevailing adopted Local Plan Policy 84 within the Dacorum Borough Local Plan 1991-2011. Whilst acknowledging that the council may yet promote further development control polices addressing issues of detail to adopt within the emerging Local Development Framework, the aforementioned sentence ignores simple factual definitions relating to mooring uses and types of mooring requirements.</p> <p>I suggest that to rectify matters relating to this sentence, that the Core Strategy should incorporate relevant sections of Adopted Policy 84 distinguishing between mooring facilities and mooring requirements and recognising that whilst some larger moorings and boating uses may not be acceptable on certain areas on the Grand Union Canal within Dacorum, the proposed Core Strategy should make it clear that some offline marinas, basin as well as lay-bys and linear moorings are appropriate with the Green Belt and AONB. The implications from the concluding sentence of paragraph 26.11 is that only linear mooring may be appropriate and might be supported by the LPA when the reality is that such facilities are not the preference of the British Waterways Board and indeed may actually conflict with other boat users by creating navigation hazards as well as conflicting with other leisure and recreational uses on the Grand Union Canal that the proposed Core Strategy seeks to promote, including walking, cycling and fishing.</p> <p>No evidence base appears to exist</p>	CS25".		land adjacent to the Grand Union Canal and as such would hope to be a provider of future mooring facilities and therefore would be willing to participate at the oral examination if required.

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													<p>dealing with the number of boats using the Grand Union Canal within Dacorum or relating them to the number of mooring facilities that are available. Similarly, there is no justification that those boating facilities that are available within the Borough either adequately serve the current number of boat users or any forecast for the number of boat users there may be by the end of the Plan period.</p> <p>The proposed Core Strategy suggests that residential moorings may form part of the delivery of affordable housing in rural locations (Policy CS20 - para 14.39) as such the concluding sentence of paragraph 26.11 implies that any new mooring development to satisfy such trends may be preferable if it is on a linear towpath mooring. The implication from this paragraph is that new boating facilities would only be supported if they are of a linear type rather than in offline in a basin or marina. No reference is made to a boat lay-by, yet the difference is often a relatively narrow strip of land on the navigation side in which screening and landscaping can be incorporated. To preclude such design features in the Green Belt or AONB is ineffective.</p> <p>In addition, any additional mooring facility will require certain infrastructure. Suggesting such facilities should or could be provided using merely linear moorings in such areas of sensitive landscape is similarly ineffective.</p>			
498429	Steve Baker	CPRE - The Hertfordshire Society				Paragraph	26.18	26.18	Objecting	Yes	No	b) Effective	We are disappointed that our representations on the Draft Core Strategy in respect of light pollution	An additional second sentence, seeking a reduction in light pollution, should be inserted.	No, I do not wish to participate	

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													have not been addressed. We consider that paragraph 26.18 should go further than only seeking to reduce light pollution from transport routes. An inspiration to reduce light pollution through control over all proposals for artificial lighting and improvements to lighting infrastructure is needed in order to be consistent with Core Strategy objectives for landscape and environmental protection and enhancement.		at the oral examination	
610088	Mr Martin Hicks	HBRC					Table 12	Table 12	Objecting	No	b) Effective		The Plateau / Ridge landscape type for settlement characterisation within the Table should also reflect state the 'dip slope' character, as all of these settlements lie on the dip slope to the scarp and reflect the regional, Chilterns topography which characterises the nature of much of western Hertfordshire.	Add Dip Slope to the Plateau / Ridge landscape type.	No, I do not wish to participate at the oral examination	
610088	Mr Martin Hicks	HBRC					Fig.28	Figure 28	Objecting	No	b) Effective		The Vision diagram should also include: Shrub Hill Common LNR (whilst it may be just within Hemel Hempstead but the other Nature Reserves of Long Deans and Howe Grove are shown on the Place Visions which are beyond the town edges). Millhoppers Nature Reserve in the Aylesbury Vale. It is a Butterfly Conservation Reserve whose purchase was enabled by a DBC financial contribution (on the advice of HBRC). It is Wildlife Site No. 50/002.	Add Shrub Hill Common and Millhoppers to the map.	No, I do not wish to participate at the oral examination	
211503	Mr Colin	Chilterns Conservation Board				Delivery	Section 27	27	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		No, I do not wish to participate at the oral	

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	White												<p>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 to the purpose of conserving and</p>		examination	

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													<p>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 8th 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 delivery section for Policy CS24 concerning the AONB (as detailed on page 135) is particularly welcomed and supported as drafted due to the references to the need to adhere to the Chilterns Buildings Design Guide and associated building materials technical notes and the need to implement the AONB Management Plan and associated guidance.</p>			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	27.12	27.12	Supporting	Yes	Yes		HCC would observe that where a development is proposed and lack of viability is advanced as a reason for not making appropriate contributions towards mitigating development impacts, then it should not automatically be assumed that planning permission will be forthcoming. It is assumed that in		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

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													<p>making assessments of development viability there will be an ongoing and active dialogue with the County Council's Planning Obligations section.</p> <p>In those instances where development will have impacts that cannot be satisfied from existing infrastructure, (for example where there are not sufficient school places), and viability is advanced as the reason for not making contributions then, depending on the scale of development proposed, HCC may well argue that planning permission should not be granted.</p> <p>Inextricably linked to the point above, this bullet point specifies that 'the availability of infrastructure will play a major role in determining the phasing and exact location of future development.'</p> <p>It tends to support the assertion that sites that do not make the appropriate contribution towards the provision of expanded (or new) infrastructure, should not be bought forwards where that infrastructure is required to support new development.</p> <p>Holding Sites In Reserve</p> <p>The identification of two education reserve sites in Hemel Hempstead, (the location of which might usefully be reviewed every 5 years or so), is an appropriate way to seek to ensure that the provision of additional latent school capacity is factored into the</p>			<p>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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													spatial plan which, after all, covers a period to 2031. It would be helpful if these could be reviewed every 5 years or so as part of any review of any subsequent Site Allocations document.			
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 27.12	27.12	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>
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 27.13	27.13	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>		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 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.			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	Paragraoh 27.14	27.14	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>
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	28.1	28.1	Supporting	Yes	No	b) Effective	We welcome the inclusion of Green Infrastructure as a necessary infrastructure type alongside physical and social infrastructure in paragraph 28.1 and in paragraph 1.21, and the expectation that GI will be included in the Infrastructure Delivery Plan, provided in new development and be eligible for		No, I do not wish to participate at the oral examination	

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													receipt of developer contributions. We also support the references to cumulative effects made in paragraphs 1.21 and 28.8. It is critically important that the cumulative direct and indirect effects of development on biodiversity and the integrity of ecological networks and systems is fully taken into account in planning and decision-making, and that adequate mitigation and compensation for harm and additional GI provision is secured, implemented and managed in the long term.			
603361	AN Champion					Paragraph	28.3	28.3	Objecting	Yes	Yes		Berkhamsted's infrastructure is fully stretched already (parking, schools etc). Getting infrastructure right is difficult and funding sufficient capacity is likely to always be an issue. One specific example is water sources are rarely mentioned in this Strategic Plan and with an increase of 1180 households in Berkhamsted over 20 years (some 20% increase) this is likely to be a critical constraint. The River Bulbourne is currently dry and aspirations to ensure the chalk stream is maintained seem unlikely to be met.			
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	28.3	28.3	Supporting	Yes	Yes		The key relationship between the provision of new infrastructure and the IDP is noted. It is imperative that the IDP picks up on the infrastructure required to mitigate the impacts of development within the Borough. The commitment to update and amend the IDP on an annual basis is welcomed.		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.
488516	Mr Hugh Siegle					Paragraph	28.5	28.5	Objecting	No	b) Effective		I do not agree that there are no infrastructure constraints to the planned level of new development. Water is the fundamental natural resource. There is evidence that current levels of extraction are lowering the levels of the aquifers on which the Borough depends. The Core Strategy ignores this barrier to new development. The issue of responsibility for road and footway maintenance, the Borough or County needs to be resolved. The piecemeal approach by the County is detrimental to the Borough environment		No, I do not wish to participate at the oral examination	
618831	Mr	Thames Water				Paragraph	28.5	28.5	Supporting	Yes	Yes		We support the emphasis placed on the timely provision of infrastructure	N/A	No, I do not wish to	

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	Mark Mathews	Utilities Ltd											in Section 28 and throughout the Core Strategy. We also support the Council in the preparation of the Infrastructure Delivery Plan. The recognition in paragraph 28.5 that the most pressing issue in respect of the delivery of development proposed in the Core Strategy is that of sewage treatment infrastructure, is supported.		participate at the oral examination	
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph		28.7								
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 28.7	28.7	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.
211055	Mr Matthew	Hertfordshire County Council				Paragraph	28.8	28.8	Supporting	Yes	Yes		HCC supports the fact that obligations and CIL will be used to ensure that		Yes, I wish to participate at the oral	It is considered that it would be helpful to DBC if officers from

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	Wood												<p>development makes the necessary contributions towards the infrastructure</p> <p>required to support new development. The acknowledgment of the fact that</p> <p>Section 106 will continue to be used to support the delivery of certain specific pieces of infrastructure is further welcomed. HCC Planning obligations team will welcome the opportunity of continuing to work in partnership with colleagues at DBC in order to clarify what elements of infrastructure might remain to be considered under Section 106.</p>		examination	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.
618873	Miss Odette Carter	Herts and Middlesex Wildlife Trust				Paragraph	28.8	28.8	Supporting	Yes	Yes		<p>In general, HMWT believes that the Core Strategy is sound, but there are various small modifications we would hope to see made to make it more consistent and effective. Our comments relate predominantly to nature conservation and green infrastructure issues.</p> <p>We welcome the inclusion of Green Infrastructure as a necessary</p>		No, I do not wish to participate at the oral examination	

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													<p>infrastructure type alongside physical and social infrastructure in paragraph 28.1 and in paragraph 1.21, and the expectation that GI will be included in the Infrastructure Delivery Plan, provided in new development and be eligible for receipt of developer contributions. We also support the references to cumulative effects made in paragraphs 1.21 and 28.8. It is critically important that the cumulative direct and indirect effects of development on biodiversity and the integrity of ecological networks and systems is fully taken into account in planning and decision-making, and that adequate mitigation and compensation for harm and additional GI provision is secured, implemented and managed in the long term.</p> <p>HMWT strongly supports the coordinated and complementary use of planning conditions, planning obligations (S106) and CIL funds to support the delivery of GI and ensure the protection and enhancement of habitats and species in Dacorum and neighbouring areas. We hope to see Green infrastructure included explicitly in the Infrastructure Delivery Plan, any related SPDs and any future CIL R123 statement, if not in Policy CS35 itself.</p>			
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 28.8	28.8	Supporting	Yes	Yes		<p>This comment relates to Paragraphs 28.7 - 28.11 and Policy 035 which addresses infrastructure and developer contributions.</p> <p>Our client supports the approach identified by the Council and welcomes the recognition of the need to consider viability matters</p>	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	<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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													(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.			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 Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 28.9	28.9	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.
211055	Mr Matthew Wood	Hertfordshire County Council				Paragraph	28.10	28.10	Supporting	Yes	Yes		The clarification in text, that the Council would only give consideration to relaxing one or more of the		Yes, I wish to participate at the oral examination	It is considered that it would be helpful to DBC if officers from Hertfordshire

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													contribution requirements, but only as an exception is noted and supported. To do otherwise might stymie the delivery of key infrastructure and mean that the 'Visions' and 'Objectives' set out throughout the Core Strategy are diluted to the point where the credibility of the Core Strategy document suffers.		n	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.
494310	Mr Elliot Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 28.10	28.10	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	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

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													suggested that the need for flexibility to consider viability should also be specifically set out in Policy 035 as well as the supporting text.			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 Jones	Barratt Strategic	494284	Mr Elliot Jones	Rapleys LLP	Paragraph	Paragraoh 28.11	28.11	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.
609833	ms anne foster					Infrastructure and Developer Contributions	CS 35	Policy CS 35	Objecting	Yes	No	b) Effective	The statement "Supporting infrastructure should be provided in advance of, or alongside the development, unless	The policy is too vague should be changed to include detailed infrastructure enhancements should be indentified and costed and	No, I do not wish to participate at the oral examination	

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													<p>there is existing capacity. Appropriate phasing for the delivery of infrastructure will be decided on a case by case basis"</p> <p>has proved not to be implementable. Many infrastructure enhancements require longer planning times than proposed developments.</p> <p>This is evidenced in Berkhamsted where 500+ homes have been built since 2006 with no infrastructure enhancements other than an additional parking deck at the station for commuters - (still a last resort due to high charges).</p> <p>There are major issues with</p> <ul style="list-style-type: none"> primary/nursery school places (only just starting to be addressed) traffic and parking (Urban Traffic Plan for Berkhamsted has not been completed), there is no assessment of parking requirements sewage (DWF is well above the consent level and will be until the consent level is raised in 2015) <ul style="list-style-type: none"> o The water cycle survey indicates that major improvements are required at the Berkhamsted Sewage treatment works - there is no evidence that this is included in Thames Water's plans for AMP5 (2010 to 2015) <p>Particularly in these difficult</p>	<p>funding sources identified before a development commences</p> <p>the requirement to provide a deliverability time frame before development commences should be included</p>		

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													economic times developments should not be started until there is certainty that associated infrastructure enhancements can be put in place at an early stage.			
211055	Mr Matthew Wood	Hertfordshire County Council				Infrastructure and Developer Contributions	CS35	Policy CS 35	Supporting	Yes	Yes		<p>Fundamentally, HCC support this policy, particularly the requirements that ;</p> <p>Supporting infrastructure should be provided in advance of, or alongside the development , unless there is existing capacity', that; ;</p> <p>appropriate phasing for delivery of infrastructure will be decided on a case by case basis' and that;</p> <p>Development will not be permitted to breach critical infrastructure capacity limits'</p> <p>As noted above we would hope that Hertfordshire Property Planning Obligations team are consulted upon interpretation of these infrastructure capacity limits where pertinent to relevant HCC services.</p> <p>Subject to the above points, HCC supports the policy.</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

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																the 'soundness' of the Core Strategy.
404973		Taylor Wimpey UK Limited	211010	Mr Jeremy Woolf	Woolf Bond Planning	Infrastructure and Developer Contributions	CS35	Policy CS 35	Objecting	No	No		<p>The need for developer contributions toward the provision of necessary infrastructure should relate, for the most part, to direct impact mitigation and should be based upon a robust evidence base to justify the necessary commuted sums.</p> <p>An onerous requirement for developer contributions, in addition to that for affordable housing provision on site, could make schemes unviable and could as a result limit the number of sites coming forward for development. This is likely to have further implications for the affordability or otherwise of housing.</p>		No, I do not wish to participate at the oral examination	
618831	Mr Mark Mathews	Thames Water Utilities Ltd				Infrastructure and Developer Contributions	CS35	Policy CS 35	Supporting	Yes	Yes		<p>The inclusion of Policy CS35 within the Core Strategy is supported. In particular we strongly support the inclusion of the second paragraph of this Policy, as follows:</p> <p>"Supporting Infrastructure should be provided in advance of, or alongside the development, unless there is existing capacity. Appropriate phasing for the delivery of infrastructure will be decided on a case by case basis."</p>	N/A	No, I do not wish to participate at the oral examination	
467616	Mr Richard Ronald					Infrastructure and Developer Contributions	CS35	Policy CS 35	Objecting	Yes	No	a) Justified	<p>It is not sound because it is not Justified, Effective or Consistent with national policy.</p> <p>This 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.</p> <p>The policy statement is not quite correct in that not all development contributions to the infrastructure</p>	<p>"Development for smaller market housing projects less than 10 dwellings in the towns or less than 3 dwellings in the rural area to be exempt from provision of contributions to local or strategic infrastructure.</p> <p>Social Housing projects of 10 dwellings or more that contain Shared Ownership housing to contribute to Local and Strategic Infrastructure.</p>	Yes, I wish to participate at the oral examination	

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													<p>are required. For example CIL Is not to be paid by Housing Associations (RPs).</p> <p>The Council policy is likely to put a stop to much small scale projects with this policy. Particularly when combined with the Sustainable Housing policy CS29 these policies potentially will impose huge costs on small developers.</p> <p>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.</p>			
503254		Royal Mail	625562	Ms Lisa Bowden	BNP Paribas Real Estate	Infrastructure and Developer Contributions	CS35	Policy CS 35	Objecting	Yes	No		<p>This Policy states that "all development will provide or contribute to the provision of the on-site, local and strategic infrastructure required to support the development. This may be provided in kind or through financial contributions".</p> <p>Royal Mail appreciates the importance of the timely provision of the infrastructure required to support new development and, in this regard, supports the inclusion of a Policy setting out the Council's approach to developer contributions. Further, we support the inclusion of paragraph 28.10 which identifies that:</p> <p>"If a development is rendered unviable by the combined demands of the policies that impose a cost on developers, a lower level of financial contribution towards the local and strategic infrastructure may be acceptable. This approach will be applied as an exception, where the development is necessary for the</p>	<p>However, we request that Policy CS35 is amended to explicitly state that any level of financial contributions sought must be:</p> <p>subject to the overall viability and deliverability of the development; reasonably related to the scale of the scheme justified in Circular 05/05 and regulation 122 of the Community Infrastructure Levy Regulations 2010 terms;</p> <p>other exceptional costs associated with the specific development, will be considered when assessing how new infrastructure is to be delivered and funded on a site by site basis; and subject to independent verification</p>		

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													delivery of the Core Strategy and the key infrastructure required for its support is provided."			
503294	Chris Shaw	Highways Agency				Infrastructure and Developer Contributions	CS 35	Policy CS 35	Objecting	Yes	No		<p>Please see hard copy for more details:</p> <p>Policy CS35 indicates that development will not be permitted that would breach critical infrastructure capacity and that phasing for delivery will be decided on a case by case basis. The principle of this approach is considered sensible, and whilst it would have been useful for the plan to outline the type of trigger points that may be considered, especially so for the larger strategic sites such as Maylands/East Hemel Hempstead, the Highways Agency recognises that it is more likely that such precise details will be contained, or are expected to be contained, in a forthcoming Site Allocations Development Plan Document and East Hemel Hempstead AAP.</p> <p>Whilst the Highways Agency considers the plan provides a good policy foundation for informing more detailed, place/site specific planning policy to be outlined in future development plan documents, it is requested that the plan indicates that future discussion of development phasing and infrastructure will be made in consultation with relevant stakeholders including the Highways Agency.</p>	<p>The Highways Agency proposes the following additional text within Policy CS35:</p> <p><i>"Further discussion will be required with relevant stakeholders including the Highways Agency and Hertfordshire County Council to ensure that the capacity of existing infrastructure and the need for required new infrastructure is recognised during the detailed phasing of development."</i></p>	No, I do not wish to participate at the oral examination	
494310	Mr Elliot	Barratt Strategic	494284	Mr Elliot	Rapleys LLP	Infrastructure and Developer Contributions	CS 35	Policy CS 35	Supporting	Yes	Yes		This comment relates to Paragraphs 28.7 - 28.11 and Policy 035 which addresses infrastructure and	The wording of Policy C35 should be amended to include the comments on viability matters as	Yes, I wish to participate	Our client is a national house builder, which has

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	Jones			Jones									<p>developer contributions.</p> <p>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.</p>	set out in Paragraph 28.10.	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>
211054	Mr Gary Durden	Linden Homes (Chiltern) Ltd	490519	Miss Nicola Broderick	NMB Planning Ltd	Appendix 2 - Housing Trajectory	Appendix 2		Objecting	No	No	a) Justified	<p>It is unsound because it is not Justified, Effective or Consistent with national policy.</p> <p>Page 242 onwards - Appendix 2 (Housing Trajectory): The Council's assessment of housing land supply from existing commitments and allocations is over-optimistic. There would be a shortfall in housing supply and that shortfall would increase if all the commitments do not come forward. This is examined in more detail in our accompanying document. The current proposed housing target at Hemel Hempstead could not be met.</p>	Review the assessment of housing land supply from existing commitments and allocations which is over-optimistic. There will be a shortfall in housing supply and that shortfall would increase if all the commitments do not come forward. The current proposed housing target at Hemel Hempstead could not be met. The overall housing supply should be increased.	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 housing sites existing and proposed (in the Core Strategy as well as in Appendix 2) will need to be examined orally.
5030	W	W Lamb Ltd	2109	Mr Boyer		Appendix 2 -	Appendix 2		Objecting	Yes	No	a)	It is not sound because it is not	The housing trajectory needs to	Yes, I wish	Significant issue

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32	Lamb		65	David Lander	Planning	Housing Trajectory			g	s		Justified	Justified, Effective or Consistent with national policy. The housing trajectory is over-optimistic and inadequate to deliver the increased provision indicated in our objection to Policy CS17 - see Section Four of Statement.	be amended to ensure delivery of 13,500 dwellings by 2031, incorporating new allocations as necessary.	to participate at the oral examination	relating to housing provision spatial strategy, Hemel Hempstead Place Strategy.
610088	Mr Martin Hicks	HBRC				Appendix 3 - Delivery Mechanisms for the Vision and Strategic Objectives	Appendix 3		Objecting		No	b) Effective	I consider that Appendix 3 should also include the Dacorum Local Food Initiative as this includes a Local Food Strategy which will hopefully contribute towards providing a delivery mechanism to Policies CS24, CS25 and CS26. It also may help with other economic policies in respect of sustaining / encouraging small food businesses and rural enterprise. This would also apply to: Function and character of market towns, villages and countryside; Protect and enhance Dacorum's distinctive landscape character, open spaces, biological diversity etc. Promote use of renewable resources and reduce waste etc (Love Food Hate Waste programme - pushed by Bucks CC in respect of Local Food agenda. HCC have also given this some profile).	Add references to Dacorum Local Food Initiative as outlined above.	No, I do not wish to participate at the oral examination	
610088	Mr Martin Hicks	HBRC				Appendix 4 - Glossary	Appendix 4		Objecting		No	b) Effective	1. The Evidence Base should also include 'information' provided by other organisations to reflect the basic evidence used to compile our understanding of resources in the first place. For biodiversity and	Make the changes to the Glossary as outlined above.	No, I do not wish to participate at the oral examination	

