



CORE STRATEGY REPORT OF CONSULTATION

Consultation Draft Core Strategy Summary of Responses

(November 2010 - June 2011)

Volume 6 Annex A

Includes:

- **Summary of Responses to the general public consultation**
- **Reports from the Citizens Panel**
- **Hemel Hempstead Town Centre Workshop**
- **Changes to the Consultation Draft Core Strategy**

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یہ اشاعت مرکزی لائحہ عملی پر مشاورتی رپورٹ کی جلد 6 اینیکس A ہے۔ اگر آپ یہ معلومات اپنی زبان میں چاہتے ہیں، یا کونسل سے کسی اور مسئلے کے بارے میں رابطہ کرنا چاہتے ہیں، تو برائے مہربانی 01442 867212 پر فون کریں۔

اگر آپ یہ معلومات کسی اور شکل میں چاہتے ہیں جیسے بڑی چھپائی یا آڈیو ٹیپ تو برائے مہربانی فون کریں 01442 228660 یا صرف منی کام کے لئے 01442 867877۔

આ પ્રકાશન કેન્દ્રિય વ્યુહરચના વિશેનો મસલત અહેવાલ ગ્રંથ ૬ – પરિશિષ્ટ એ છે. જો આ માહિતી તમારે તમારી પોતાની ભાષામાં મેળવવી હોય તો અથવા તો બીજા કોઈ પણ મુદ્દા વિશે તમારે કાઉન્સિલનો સંપર્ક કરવો હોય તો, મહેરબાની કરી 01442 867212 ઉપર સંપર્ક કરો.

જો આ માહિતી તમારે બીજા આકારમાં, જેમ કે મોટી છાપ, અથવા ધ્વનિ ટેપ (ઓડિયો ટેપ) માં મેળવવી હોય તો, મહેરબાની કરી 01442 228660 ઉપર સંપર્ક કરો અથવા ફક્ત મીનીકોમ માટે 01442 867877 ઉપર ફોન કરો.

Report of Consultation

The Core Strategy for Dacorum Borough has been prepared taking account of Government policy and regulation, technical evidence and consultation. Consultation has spanned seven years, from 2005 to June 2011. This report explains the consultation: i.e.

- the means of publicity used;
- the nature of the consultation;
- the main responses elicited;
- the main issues raised; and
- how they have been taken into account.

It also explains how the actual consultation relates to the Council's policy on consultation and engagement, the Statement of Community Involvement.

The report is presented in seven volumes:

- Volume 1:** Emerging Issues and Options (June 2005 - July 2006)
- *Annex A* contains a summary of responses from the organisations consulted
- Volume 2:** Growth at Hemel Hempstead and Other Stakeholder Consultation (July 2006 –April 2009)
- Volume 3:** Stakeholder Workshops (September 2008 – January 2009)
- *Annex A* contains reports on each workshop
- Volume 4:** Emerging Core Strategy (May - September 2009)
- *Annex A* contains a summary of responses to the general public consultation
- *Annex B* contains reports from the Citizens' Panel and Gypsy and Traveller community
- Volume 5:** Writing the Core Strategy - from Working Draft to Consultation Draft (June – September 2010)
- Volume 6:** Consultation Draft Core Strategy (November 2010 – June 2011)
- *Annex A* contains a summary of responses to the general public consultation and reports from the Citizens' Panel and Town Centre Workshop. It also includes changes made to the Draft Core Strategy.
- Volume 7:** Overview

This is Annex A to Volume 6.

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APPENDICES

Appendix 1

Summary of Responses to Questions raised in the General Public Consultation

- **This includes changes to the Core Strategy in response to the consultation.**

Borough Vision

QUESTION 1

Do you support the 'Borough vision' set out in Section 6?	
Responses received	116
Yes - Key organisations	14
Individuals	26
Landowners	9
Total	49 responses
No clear answer:	
Key organisations	0
Individuals	3
Landowners	1
Total	4
No - Key organisations	9
Individuals	45
Landowners	9
Total	63 responses
Response	Actions
<p>Organisations</p> <p><i>Organisations who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • HBRC – traditional agriculture and food production should be seen as part of the vision; development of a local food economy should also be included within the vision, which in itself should contribute to wider sustainability objectives such as climate change, reducing food miles, etc, where possible within the vision. • Boxmoor Trust– general support is given to the vision; however there is a need for more modal shift in transport habits to be emphasised. • British Water Ways– in the Dacorum 2031 vision, we would add after Public transport is more widely used..."and more people are walking and cycling in a safe, attractive and enjoyable environment". • Chiltern Society– continuous development of the larger settlements is implied, this is not sustainable for Hemel Hempstead. The original new town development was for 80,000 inhabitants. Set a limit to the size of Hemel at the present town. There 	<p>In most instances, no action is required in response to comments from organisations.</p> <p>The vision is a broad encompassing statement of what the borough should be like in 2031. Detailed points made by organisations are appropriate in their own right, but are covered in general in the vision and/or elsewhere in the Core Strategy.</p> <p>The original concept of Hemel Hempstead New Town dates back to the 1940s. It is reasonable that the town should evolve: there have been changes in thresholds for services, new economies of scale, and new demands (for example, children of first or second generation residents wishing to remain). Without growth</p>

<p>should also be design limits on the size of the large towns.</p> <ul style="list-style-type: none"> • Chilterns Conservation Board– Page 15, criterion (d) is to ‘conserve the special qualities of the parts of the borough within the Chilterns AONB’. This criterion should be reworded to read ‘conserve and enhance the specialities of the parts of the borough within the Chilterns AONB’. • Hertfordshire Police Authority– further reference to the creation of safe and sustainable communities to meet the objective of PPS1 should be included in the Vision. Amend the following section of the vision as follows; “Communities are inclusive healthy and safe...Open space, facilities and services are accessible and secure.” • HCC– mixed use developments to accommodate waste facilities is supported (para 9.19). The regeneration of Hemel Town Centre and Maylands Business Park are good examples of where waste should be managed. The strategy should place an emphasis on managing waste as close to its source as possible. Include provision of an enlarged replacement Household Waste Recycling Centre (HWRC) to meet the needs of the town. • HCC– suggested rewording of part of para 4.22: “Dacorum has a rich and varied Historic Environment. The borough includes a diversity of architectural types, from the distinctive New Town architecture to more traditional brick and flint buildings of market towns. The Grand Union canal runs north to south, formerly powering the paper mills which once dominated the Gade Valley. The borough is also home to around 2000 Listed Buildings, 25 Conservation Areas, 4 Registered Parks and Gardens, 40 Scheduled Ancient Monuments and over 1300 other known archaeological sites.” • Tring Sports Forum– disappointed to find no reference to sports or leisure in the vision, these 	<p>the town’s services and role could diminish. The principle of expansion is still focused on sustainable neighbourhoods.</p> <p>Specific changes are listed below:</p> <ul style="list-style-type: none"> • to conserve and enhance the AONB; • to manage waste close to its source; • to refer to archaeology and registered parks and gardens in para 4.22.
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should be integral elements of the Borough Vision.

Organisations who agreed made the following comments:

- Bovingdon Parish Council– support vision.
- British Standards Institute– support vision.
- Friends of the Earth– support vision.
- Hertfordshire Chamber of Commerce & Industry– support vision. However there are concerns over housing targets being too high.
- Jehovah’s Witnesses– specifically support “communities are inclusive and healthy. Minority groups are an accepted part of culture and diversity”.
- Markyate Parish Council– generally supports the vision. However cross border issues are more complex.
- Natural History Museum – support vision.
- Nettleden & Potten End Parish Council–support vision.
- NHS Trust– in particular support given to page 15, which states; “careful consideration needs to be given to the provision of health care”.
- Royal Mail– support vision.
- Transition Town Berkhamsted– support vision.
- Tring Rural Parish Council– support vision, but there are fears that it might be ambitious in light of current funding cuts experienced everywhere.
- Tring Town Council – support vision.

Individuals

Individuals who disagreed made the following comments:

- Apsley has been left out of the vision, Frogmore Road industrial units 1-13 need to be redeveloped. The industrial estate should be changed to residential use.
- Residents of Berkhamsted do not support Dacorum 2031 vision. “The market towns of Berkhamsted and Tring and the large villages provide all the necessary services for their communities and surroundings”, this is an unsupported blanket comment, which has no documented factual basis. Developments in Berkhamsted and Northchurch have been unsympathetic to the historic environment therefore the following statement should be changed “Developments have added to character through their design, and sustainable construction is the norm.”
- The strategy does not consider the character of Berkhamsted and it does not provide solutions to the problems that will be created by development.
- The Borough Vision states that water quality in rivers is good; however the Thames River Basin Management Plan identified some stretches of water quality which is not good. Under European Legislation we must improve ecological health of water bodies by 2027. Water efficiency measures should be encouraged and water resources should be protected from pollution.
- “New homes are affordable and cater for the needs of the population”, this statement is unrealistic. Not all new homes will be affordable.
- Dacorum 2031 vision states “the natural beauty of the Chiltern Hills and the varied character of the countryside are admired and cherished. The countryside is actively managed and supports a healthy local economy and diversity of wildlife.” This statement is false if building outside Berkhamsted

No action is required in response to individuals’ comments, except to provide a definition of green enterprise.

The vision is a broad encompassing statement of what the borough should be like in 2031, not what it is like now.

It should address the character of all parts of the borough and not the market towns alone.

It should not include matters of detail, which are more appropriate to other parts of the Core strategy or other documents.

The vision needs no change because a particular policy or proposal is supported (e.g. water efficiency) or opposed (e.g. development at Shootersway, Berkhamsted). Opposition to particular proposals are considered separately. Protection of the countryside is a wide aim, and not undermined if there is a small development somewhere.

In some cases, comments question the delivery of the vision. However it is not the vision itself that is opposed.

and Tring is planned.

- Building on Green Belt/greenfield conflicts with protecting Chilterns AONB. An attractive feature of Dacorum is its countryside – do not build on it.
- The Core Strategy is a dream not a vision- it is wrong to present these details as if though they have happened in 2031 when there is insufficient substance in the plans to show how it will be comprehensively achieved.
- Existing infrastructure cannot sustain housing expansions - roads, hospitals, parking and public transport are already inadequate.
- The infrastructure in Dacorum is downsizing; with the closure of a primary school in Berkhamsted and no A & E in Hemel Hempstead. This is not helping the existing infrastructure problems.
- There needs to be more investment in public transport and sustainable design otherwise the carbon reduction agenda will suffer.
- Individual proposals will undermine these aspirations and therefore they are meaningless- for example the strategy states Berkhamsted and Tring to have their community services locally and yet Berkhamsted's current population is not served by local services.
- More houses mean more cars- roads and parking need to be improved. Congestion is a growing issue (around the train station, magic roundabout, Two Waters traffic lights, access through Apsley along both London Road and Belwains Lane).
- The recent downgrading of the Hemel hospital status needs to be revisited. Requests more detail on 'Local Hospital' and what a 'new Local Hospital' means.
- Clarification is needed on page 12 which makes reference to "general hospital" and page 30 states "a

new local hospital”.

- There are a number of large warehouse and office units in Maylands Business Park which have been vacant for several years- therefore significant expansion of such units seems unnecessary. Maylands Business Park should not be regenerated as it is still next to the Buncefield time bomb.
- Road through Potten End, linking Hemel Hempstead and Berkhamsted (Hempstead Road) is a rat-run and its 30mph speed limit is consistently ignored. The proposed development to the West of Hemel Hempstead will exacerbate this problem further. The road will become intolerable to residents and an environmental nightmare.
- The ‘Borough Vision’ should state that “the market towns should retain their distinctive and individual character” rather than just “that differences in the character of each area are recognised and valued”.
- Agreement with the regeneration of Hemel Hempstead, however there should be no extension of settlement boundaries into the Green Belt. Regeneration is supported but expansion is opposed.
- There needs to be more emphasis on the cultural benefits regeneration could bring to the Borough through a Performing Arts Centre.
- More detailed maps are required in the strategy, current maps are not sufficient.
- More affordable parking is required.
- “The market towns of Berkhamsted, Tring and the large villages provide all the necessary services for their communities and surroundings”- this is an untrue statement.
- Paragraph 4.14 - “Hemel Hempstead is the principle

shopping destination within the borough”, this is untrue the quality of shops is poor and choice is limited. A lot of work needs to be done if Hemel is to become the main shopping destination in the area.

- There is no justification for all the housing figures. Housing for Berkhamsted and Tring on the scale suggested in the strategy is opposed.
- Density of proposed development in Berkhamsted is too high.
- Residential growth in the Borough has been over emphasised.
- There needs to be figures for development of open space and playing fields per head of population.
- Utopian statements don't necessarily transfer into good policy. Clarification is needed on what “important for green enterprise” means.
- Disagree with “communities within Dacorum recognise it as a happy, healthy, prosperous and safe place in which to live, work and visit”. If the plans continue as they are safe places which are predominantly the market towns and villages, will cease to exist.
- The vision makes no mention of sports facilities, sewerage, advanced internet/telephone/communication systems.
- Building of dwellings in Shootersway/Durrants Lane area is not supported. The development will increase carbon emissions and each new dwelling will contribute to existing problems with infrastructure/congestion in the area.
- There is opposition to extra housing in Hemel/Berkhamsted which in turn will enlarge the urban environment and reduce the other villages to dormitories.

- The vision should be amended to recognise the importance of providing a range of housing types and tenures across all parts of the borough, which will assist in sustaining inclusive local communities.
- The vision is entirely contradictory. It champions preservation of the unique character of the area through measures that will destroy this same character.
- The core strategy needs to allow for specific places of worship and community centres.
- Hemel's history and identity is not sufficiently celebrated and developed. For example; the Kodak Building was a focal point and now just another tower block.
- More emphasis needs to be placed on improving and expanding educational facilities.
- Produce a statement of what problems exist in the Borough, and how planning is going to mitigate/overcome them.

Individuals who agreed made the following comments:

- Specific support given to Draft Core Strategy where it states minority groups are accepted and communities are inclusive.
- The vision needs to develop a stronger focus on developing an identity for certain areas of the borough.
- The current housing waiting list should be utilised in order to derive a strategy that will house the maximum number of people already on it. This should be the first priority.

Landowners:

Landowners who disagreed made the following comments:

- Crest Nicholson - the strategy seeks to meet only 'locally generated demand for new homes'. The Draft Core Strategy assumes nil net migration which is unrealistic. The current policies will suppress economic growth by limiting the supply of housing in turn discouraging inward migration.
- Gleeson Strategic Land – a nil net migration approach to housing provision is unrealistic, this level of housing will hinder the part of the vision which states 'new homes are affordable'.
- Grand Union Investments – the supporting evidence base and sustainability appraisal has not sufficiently examined strategic housing issues. Additionally they do not address the need to accommodate natural population growth.
- DLP Planning Ltd– the core strategy as a whole does not consider the relationship between housing and employment, and fails to consider the consequences of not providing enough housing for people that live and work in the Borough.
- Apsley Development Limited– the general principle of the vision is supported. However there is concern that the vision fails to take into account the Borough's place in the wider region, with its interrelationship with London and neighbouring authorities. The Council's vision for Hemel Hempstead: "being a sub-regional business centre" will be undermined if a strategy which limits the amount of housing to: "meeting the locally generated demand for housing" is pursued, this is an unsustainable approach.
- Aviva Investors– concerns have been raised with Maylands Business Park (paragraph 5.4) being identified as a 'green business park'. The strategic planning policies should not be prescriptive and should instead be flexibly worded so that they can adapt to the needs of business.
- Linden Homes Ltd – simply providing housing to

No action is required in response to comments from landowners.

Landowners do not generally disagree with the challenges set out in Chapter 5, though there may be different emphases to suit particular interests. The challenge to regenerate Hemel Hempstead town Centre does not require protection of other existing shopping destinations. The challenge to strengthen the role of Maylands is supported by technical evidence, the business community, the Maylands Master Plan and the fact of its existing sub regional employment role.

The vision is a broad encompassing statement of what the borough should be like in 2031, but is not overly prescriptive in accommodating business needs.

The biggest concern surrounds the level of housing development which is considered insufficient to meet natural population growth and/or support business growth.

This is a question of balance between population/ housing, jobs and the impact of new development on the environment/countryside around the towns. The Council must weigh up

meet local population needs fails to recognise the wider sub-regional nature and role of the Borough.

- W Lamb Ltd– support given to the general principle of the vision. However paragraph 3 should be amended to read: “Hemel Hempstead has been transformed through regeneration of the town centre and the Maylands Business Park. The town is fulfilling its potential as a sub-regional business centre, important for green enterprise, and is meeting the demand for new homes to ensure the sustainable growth of the town as important sub-regional business centre”.
- CALA Homes- the vision is broadly supported. The Borough should plan for at least nil net migration, which is understood to be 12,400 dwellings (paragraph 15.3) i.e. approximately 500 pa, however given Hemel Hempstead’s wider role in meeting sub-regional housing needs this should be considerably higher still.

Landowners who agreed made the following comments:

- Duck Hall Farm– vision is supported.
- ING Real Estate Investment Management – vision supported.
- Standard Life Investments Limited C/O Montagu Evans LLP – vision supported.
- Taylor Wimpey UK Ltd – vision supported.
- Zog Brownfield Ventures Ltd – vision supported.
- Akaria Investment Ltd - support the text changes at paragraph 5.5. We also request that additional wording is added to the Vision for Hemel Hempstead which should read ‘to protect and enhance existing shopping destinations’.
- Banner Homes Limited– the vision is supported.

all the key factors and reach a conclusion. Dacorum is a Borough whose settlements are set within the Green Belt, and for over 30 years strategic plans have diverted housing growth away from the Borough, and away from the Metropolitan Green Belt. A continuation of this approach is considered reasonable.

- Barratt Strategic– full support is given to Hemel Hempstead to fulfil its potential as a sub-regional business centre.

Other comments from Landowners:

- Akzo Nobel Pension Scheme – seeks clarification on how the Council intends to address regional policies following High Court’s Cala Homes decision in November 2010 and subsequent rulings. Previously they have also submitted representations seeking to bring forward the Industrial Units on Frogmore Road as a future housing allocation. The Employment Land Update specifically states that the Frogmore site should be released for alternative development (Paragraph 4.35).

Strategic Objectives

QUESTION 2

Do you support the 'Strategic Objectives' set out in Section 7?	
Responses received	98
Yes -	
Key organisations	16
Individuals	28
Landowners	8
Total	52 responses
No clear answer:	
Key organisations	0
Individuals	1
Landowners	0
Total	1
No -	
Key organisations	8
Individuals	29
Landowners	8
Total	45 responses
Response	Actions
<p>Organisations</p> <p><i>Organisations who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • Berkhamsted Town Council - Broadly support the objectives, with the observation that there is already an infrastructure deficit in terms of public/community open spaces, traffic and parking. Objective 6 will be threatened by excessive development in the town. • British Waterways – Objective 4: add “increase more sustainable forms of transport” at end of sentence. Objective 9: add bullet point “to further develop tourism, leisure and recreation”. Objective 10 needs to make reference to developer contributions and income from partnerships to enhance and upgrade facilities mentioned. • HBRC– Add objective: “to support management activities that actively contribute to delivery of environmental objectives, such as sustainable farming and forestry” (as per our comments in July 2010). • Hertfordshire County Council – Objective 9 could identify the potential for a new household waste site or in-vessel composting facility to serve the west of 	<p>The strategic objectives are a set of overarching objectives, which should be read together. Their purpose is to help focus the more detailed local objectives, policies and actions in order to deliver the Borough Vision. Although newly presented in the Consultation Draft Core Strategy, their origin can be traced to the aims listed in the Emerging Core Strategy and earlier consultation. Notwithstanding the detailed comments made by organisations, individuals and landowners, it is concluded that the set of strategic objectives is appropriate.</p> <p>The strategic objectives themselves do not need to be changed in the light of comments which say the present situation is unsatisfactory (e.g. because of lack of</p>

<p>the county. Fully support Objectives 16 and 17.</p> <ul style="list-style-type: none"> • Hertfordshire Police Authority– Objective 1 should read: “To promote <i>safe</i>, healthy and sustainable communities and a high quality of life for Dacorum”. • New Conservation Society– Objective 3: replace ‘diversity’ with ‘cohesiveness’. Objective 9: replace ‘vibrant’ with ‘efficient’. • Thames Water– Objective 16: improve by saying “To co-ordinate the delivery of new infrastructure ahead of new development, or to ensure that development is phased to allow for timely provision of infrastructure”. • Tring Sports Centre – Objective 1 needs to mention sport and leisure. Objective 11 is not ambitious enough. <p><i>Organisations who agreed made the following comments:</i></p> <ul style="list-style-type: none"> • National Grid Property & Gas – support strategy. However aims included in the Emerging Core Strategy should be reinstated: delivering the required level of new homes, the focus on reusing urban sites and ensuring the efficient use of land. Objective 7 should be reworded to say “To <i>focus development on</i>, and ensure the effective use of existing land and previously developed <i>urban</i> sites”. Objective 17 should read “To ensure that all development contributes appropriately to local and strategic infrastructure requirements, <i>whilst ensuring that such contributions do not render development unviable</i>”. • Bovingdon Parish Council – support objectives. • British Standards Institute – support objectives. • Chilterns Conservation Board – Board welcomes Objective 6. Reword Objective 12: ‘To <i>conserve</i> and enhance Dacorum’s distinctive landscape character, open spaces, biological and geological diversity and historic environment’. • Friends of the Earth – Broadly support. However there is no information on Council plans to mitigate and adapt to the impacts of climate change (Objective 2). • Hertfordshire Chamber of Commerce & Industry – 	<p>infrastructure); question whether policies satisfactorily deliver the objective(s); object to specific proposals; want to add detail; or want to add qualifying remarks.</p> <p>Strategic objectives do need to be balanced in given situations. Policies, local objectives and place visions and strategies should be used to help understand and explain that balance. If there is concern with a policy (or proposal), that is the issue, not the objective itself.</p> <p>Extra detail would be unnecessary and qualifying remarks could be confusing.</p> <p>Further comment is made below in response to specific comments from organisations, individuals and landowners.</p> <p>Firstly, organisations.</p> <ul style="list-style-type: none"> • Refer to (social) cohesiveness in Objective 3. <p>Management activity operates in all spheres, not just the countryside or in pursuit of environmental objectives. It is a significant part of delivery, and reflected throughout the Core Strategy.</p> <p>The principle of healthy and sustainable</p>
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<p>More specifics needed – how do you ‘strengthen confidence’ or ‘promote a healthy and sustainable community’?</p> <ul style="list-style-type: none"> • Jehovah’s Witnesses – Objectives 5 and 9 focus on Hemel Hempstead. However some parts of the Borough will focus on their own community; other areas will focus across the borders. • Markyate Parish Council – Objectives 16 and 17 are important: they have been given inadequate attention in the past. The links to the sustainable community strategy in Section 8 - for example to delivering lifelong learning – are sometimes tenuous. • Natural History Museum – in particular support Objectives 6 and 12. • Nettleden with Potten End Parish Council – support objectives. • Royal Mail – support objectives. • Transition Town Berkhamsted – Under the Sustainable Development Strategy a further point needs to be added [this was not stated]. • Tring Rural Parish Council – support objectives. However the council remains to be convinced of the appropriateness of wind turbines in open countryside but agrees the Green Belt and rural areas need protecting. • Tring Town Council – support objectives. • USS – support objectives. <p>Individuals</p> <p><i>Individuals who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • Strategy proposed is not taking the objectives into consideration • No references to the countryside and rural environment, despite these being addressed in policies CS5 and CS7 • Objective 10 means houses will be built - statement not supported. • Objective 12 should be amended to read: “To protect and enhance Dacorum’s countryside and rural 	<p>communities embraces safety.</p> <p>Infrastructure needs to be delivered at the appropriate time. This will vary. Policy CS35 elaborates.</p> <p>The principle of additional waste facilities at Hemel Hempstead is embraced by local objectives and Policy CS34.</p> <p>As an approach the Council considers that previously developed land should be used first in preference to greenfield sites. That principle does not only apply to urban areas.</p> <p>As an approach the Council also considers that the intention to protect and enhance environmental assets in Objective 12 conveys the right range of potential actions.</p> <p>Secondly, specific responses to individuals.</p> <p>Countryside is covered by Objective 6 and the rural environment by Objective 12 as well.</p> <p>Objective 12 includes urban and rural areas.</p>
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<p>environment, especially distinctive landscape character, open spaces, biological and geological diversity, and historic environment.”</p> <ul style="list-style-type: none"> • State those changes that will damage the landscape character and biological diversity of the area. State which areas of Green Belt will be damaged by proposals. Add to the objectives: minimise development on Green Belt and maintain the green areas on the edges of town(s). • The phrase ‘to provide a mix of new homes to meet the needs of the population’ is not specific enough. • Objectives should include building more affordable homes. • Building more houses will bring more car drivers: it is difficult to reduce car use when public transport is so bad (reference is made to the Egerton Rothesay School/Shootersway proposal in Berkhamsted). • Insufficient emphasis is placed on the role of market towns, especially Berkhamsted and the need to provide new housing to meet future needs of the settlement. • The Council has assumed growth when it is likely that jobs and economic activity will move away from UK. • Collectively objectives overemphasise residential growth. They should state that Green Belt land will be protected from any development. • Focus on improving current infrastructure. Access to facilities in [Hemel Hempstead] town centre need improving, especially road capacity, parking and the hospital. Key to promoting a healthy lifestyle is a hospital with full A & E services. • More family homes needed. Housing policies seek to reduce the supply of new housing, while employment policies seek to maintain a high level of new jobs, without providing a sufficient supply of housing, assuming people will live elsewhere. • Concern over the proposed development and speed with which it might happen, in particular the SS1 Durrants Lane/Egerton Rothesay School/ Shootersway proposal. Why is ERS dictating what 	<p>Open spaces and the historic environment, for example, are not confined to one or the other.</p> <p>Policy CS1 sets out the spatial approach to the distribution of development, settlement identity and protection of the countryside. A separate objective is not needed.</p> <p>Policies CS5-CS7 adequately cover the Green Belt and the rural area beyond the Green Belt. Some change will occur in the Green Belt within the context of Policies CS5 and 6.</p> <p>The role of market towns is covered in Objective 6 and Policy CS1. Commenters have differing views on the level of new housing, particularly at Berkhamsted. The Council has based its conclusions on striking a balance between town-generated population needs and environmental factors which constrain the delivery of those population (and housing) needs.</p> <p>Cultural needs are reflected in Objectives 3 and 11 already.</p> <p>Although not a specific objective, it is agreed that more family homes will be needed over the Plan period (the principle is covered in Objective 10 already).</p>
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<p>should be done?</p> <ul style="list-style-type: none"> • Businesses should be placed within walking distance of dwellings and public transport. Maylands Business Park should not be regenerated as it is next to Buncefield. • Add 'cultural' in the list of facilities and services: a performing arts centre/theatre should be built and offered to community performers for a reasonable sum. • Objective 7 should read existing land <i>except Green Belt</i>. Objective 13 lacks detail. • Berkhamsted will not be able to cope if 1,000 new homes are added: it already struggles with straining infrastructure. Objective 6 would be compromised by the level of proposed development in Berkhamsted. • Do not build on the Green Belt and do not allow wind turbines on the Chiltern Hills. • Objective 6: drop 'conserve and'. You cannot conserve and enhance. • Objectives do not provide enough detail to ensure protection of character of each town and village by limiting housing density. The limitations in housing density stated in 2009 must be retained in Dacorum Core Strategy. • Open spaces need to be protected. However there will be instances where development is most suited to pockets of open space. • Objective 5 focuses on Hemel Hempstead. However, the focus should be on the whole Borough, not just one town. • Do not build more homes in an area already struggling to cope (disagree with Objective 10). • Agree, as long as there are environmentally sound, sympathetic developments that are in keeping with local areas. • Healthy communities imply freedom from anxiety, noise and light pollution. • The expansion theme behind the objectives is 	<p>It is correct that Objective 5 focuses on Hemel, but Objective 6 looks elsewhere.</p> <p>While the Council supports sensible use of resources (ref. Objectives 13 and 15), Objective 9 already accurately reflects its aims for the Maylands area.</p> <p>The community strategy refers to reducing crime, creating a healthier environment and health. Figure 8 explains the cross references with the Core Strategy. All these principles are considered important by Dacorum Partnership. They are all relevant to the achievement of sustainable development. The key objective is 3.</p>
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wrong.

- Objective 7 is not achievable as the Council intend building new dwellings on land that has been farmed for decades.
- Do not support losing Green Belt land to more roads, The Council should work in partnership with industrial park employers to identify the shift patterns of employees and schedule public transport accordingly.
- Lip service will be paid to the real meaning of the term ‘sustainable development’.
- Support all objectives, except Objective 2 and the term ‘low carbon’ in Objective 9. This should be phrased as ‘energy-use reduction’: carbon is too specific.
- The document is aiming to cover too broad a spectrum: referring to ‘healthy’ in a planning document is out of place.
- Mention crime/anti social behaviour in more detail in Objective 8. More attention needs to be given to the safety of Borough residents.

Individuals who agreed made the following comments:

- The objectives are supported. The Green Belt should be preserved.
- Objectives are supported provided that the phrase ‘sustainable development’ is fully understood.
- Strongly support idea to strengthen Hemel Hempstead’s core for shopping and business.

Landowners

Landowners who disagreed made the following comments:

- DLP Planning – Objectives 4, 7 and 10 do not properly relate to one another. A proper assessment of the relationship between housing and employment should be undertaken to inform housing targets.
- Apsley Development Ltd – Objective 10 is appropriate. An additional objective is suggested: “To provide sufficient housing to meet the future needs of the Borough”. The provision of additional

<p>housing will be assisted by Objective 7, making use of existing land and previously developed sites.</p> <ul style="list-style-type: none"> • Crest Nicholson – Objective 10: make reference to meeting the housing needs of the Borough as a sub regional centre. • Gleeson Strategic Land – Housing provision is insufficient to support an additional 18,148 jobs. Increase the housing target to reflect the latest household projections. • Grand Union Investments – Does not sufficiently examine strategic housing issues or recognise need to address natural population growth. • Linden Homes (Chiltern) Ltd - Objective 10: make reference to meeting the housing needs of the Borough as a sub regional centre. • W Lamb Ltd – Objective 10 is appropriate. However an additional objective is suggested: “To provide sufficient housing to meet the future needs of the Borough”. • Aviva Investors – Concerned that Maylands is identified as a ‘focus of the low carbon economy’ (Objective 9). Strategic planning policies should be flexibly worded so they can be adapted for the needs of business. <p><i>Landowners who agreed made the following comments;</i></p> <ul style="list-style-type: none"> • Duck Hall Farm Owners – support objectives. • Akzo Nobel Pension Scheme – wishes to highlight the importance of the Council’s overall approach, which must be sufficiently flexible to encourage development and allow for other factors such as technological advances. <p>Client supports Policies CS2, CS3 and CS4, but seeks clarification as to what policy CS1 means when it states that any new development “should be based on the neighbourhood concept”, and details of how this will work in practice.</p> <p>It suggests reference to the RSS, May 2008 with the list of other key documents and strategies listed in Figure 7.</p> <p>[Landowner is promoting the Frogmore site for residential</p>	<p>Thirdly, specific responses to landowners.</p> <p>A common concern is that the housing target is too low. However unless the housing target were planned to exceed the nil net migration level Objective 10 remains accurate and adequate.</p> <p>It is agreed that appropriate partnerships and revenue funds are essential for sound maintenance.</p> <ul style="list-style-type: none"> • Refer to key landowners as a delivery agency in Section 17 (ref comment by Box Moor Trust). <p>It is also agreed to:</p> <ul style="list-style-type: none"> • Explain the neighbourhood concept further
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use and wishes to highlight local support.]

- Banner Homes Ltd – supports objectives.
- Barratt Strategic – supports objectives. Objectives 16 and 17 - potential for strategic development opportunities to deliver infrastructure - should be given weight in identifying the development strategy.
- Box Moor Trust – The key to delivery of such ambitions is the need to secure revenue streams and partners to maintain services, infrastructure and to manage community places and spaces.

Need to emphasise the importance of B&Q to the Trust's own income stream and note the possibilities identified by Two Waters Study. The Trust wants to increase income from rental housing.

Wish to be noted as a partner in delivery of 'Looking after the environment'.

- CALA Homes – supports objectives, although a higher level of housing is required. Policy CS17 (housing target) conflicts with Objectives 1, 3 and 10 and the Borough vision.
- ING Real Estate Investment Management – supports objectives, particularly Objectives 4, 5, 7, 9, 10, 11 and 16.
- Taylor Wimpey UK Ltd – supports objectives.

Promoting Sustainable Development

QUESTION 3

Do you support the approach to 'Promoting Sustainable Development' set out in Section 9?				
Responses received	83			
Yes -			No clear answer:	
Key organisations	10		Key organisations	0
Individuals	21		Individuals	0
Landowners	7		Landowners	1
Total	38 responses		Total	1
No -				
Key organisations	6			
Individuals	27			
Landowners	13			
Total	46 responses			
Response		Actions		
<p>Organisations</p> <p><i>Organisations who disagreed made the following comments:</i></p> <p>Markyate Parish Council – Would like Strategic Objective 5 (p 30) amended to read the following: “to promote Hemel Hempstead as a focus within the borough.” They also take issue with policies following from the Urban Design Assessment and Site Allocations consultation, as they believe these documents to be incorrect and have previously challenged them. A further concern pertains to para 9.23: protection of the Ver Valley to the north is currently inadequate and that protection to the south towards Flamstead is also required. Lastly they are concerned with lack of consideration of local roads in the Bushwood Green Plans [in Luton and Central Bedfordshire] (para 9.27). Luton Road is wrongly classified as a secondary vehicular route.</p> <p>Chilterns Conservation Board – The final part of Policy CS1 should be reworded to read “Development that supports... and is compatible with policies seeking to conserve and enhance the Green Belt, Rural Area and the natural beauty of the Chilterns AONB.”</p>		<p>No action is required in response to most comments from organisations, individuals and landowners.</p> <p>Hemel Hempstead is the largest place and will take the majority of new development, and by definition will be the focus for homes and jobs.</p> <p>The other places are all smaller and would accept change according to their circumstances – Berkhamsted is different to Markyate, for example.</p> <p>There is no strategic imperative (e.g. from the Regional Spatial Strategy) to suggest otherwise.</p> <p>Infrastructure capacity and the provision of</p>		

<p>Hertfordshire Police Authority – Would like para 8.2 amended to include Hertfordshire Constabulary as one of the named delivery partners responsible for producing the sustainable community strategy.</p> <p>New Conservation Society – Would like the following comment added to para 9.2 and 9.3: “A key component of Sustainable Development is world population growth, which exacerbates the problems of scarcity of land and other resources and is on such a scale that UK migration policy, while being a key determinant in UK planning, has negligible effect on it one way or the other. Our Borough’s aspirations in that respect will be channelled through agencies such as <i>Interact Worldwide</i> whose vision is “<i>a world where all people are equally able to enjoy sexual and reproductive health and well-being and exercise their sexual and reproductive rights</i>””</p> <p>Wigginton Parish Council – Would like clarification about what is meant by the term “village appraisals” in para 9.33. Does this mean a local housing needs survey? Will Parish Councils be involved in the identification of these local needs and if so, in what way?</p> <p><i>Organisations who agreed made the following comments:</i></p> <p>National Grid Property & Gas - Agrees with policies CS1 and CS2, which state that the priority for residential development should be on previously developed land. Objective 7 should be revised to more clearly reflect the sequential approach contained in Policy CS2</p> <p>Bovingdon Parish Council – support the approach set out in Section 9 with an emphasis on the strong protection of the Green Belt.</p> <p>Friends of the Earth – Broadly support the approach as long as there is maximum support and no loosening of protection for the Green Belt.</p> <p>Hertfordshire County Council – Supports draft policies CS1, 3, 4, 5, 6 and 7. It is noted that Kings Langley Secondary and Ashlyns are identified as Major Developed Sites (MDS) in the Green Belt. The need for greater flexibility applies across all secondary school sites whatever the settlement</p>	<p>infrastructure is a key consideration in all places.</p> <p>There were many detailed comments. The chapter should not however include matters of detail or qualifying statements, which are more appropriate to other parts of the Core strategy (or are already there) or other documents.</p> <p>In response to specific comments from organisations:</p> <ol style="list-style-type: none"> 1. Road classification has been agreed with the local highway authority and followed consistently over many years. 2. It is considered more appropriate to protect and enhance the environmental assets generally. Policy CS24 covers the AONB specifically. 3. The police will be listed as a delivery partner (para 8.2).
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so there is a need to review both MDS infilling boundaries as well as introducing suitable criteria in Open Land designations to enable educational development where that can be justified. It might also be prudent to amend policy CS7 to acknowledge that there may be settlements within the Rural Area where affordable housing schemes might yield numbers of children that might suggest a need for expansion of schools: alternatively, such expansions could be justified on very special circumstances if and when the need arises.

Natural England – Policy CS1 is fully supported. For CS2, they comment that brownfield sites are often as diverse as greenfield sites, so it is not always the best option to develop on previously developed land first. In Section 9 para 9.29 a line should be added that ‘inappropriate development’ will only be allowed if there are no alternative locations.

Berkhamsted Town Council – Supports the sustainable development strategy and Policy CS1, provided they are applied consistently across all the market towns. The Town Council considers that the urban capacity of the town was assessed using densities which are too high. The proposed number of dwellings on the strategic Site at Durrants Lane/ Shootersway. Is too high. Sec 106 funds should not be used to fund an existing infrastructure deficit, only infrastructure required by the new development.

Individuals

Individuals who disagreed made the following comments:

Concerned at lack of detail in Chapter 9. It is only “half formed”, because it does not answer any of the questions posed, e.g. numbers of residential and non-residential completions within the Green Belt.

Concerned whether proposals will actually result in positive sustainability outcomes. Questions whether there are realistic plans for transport, local jobs, local food production, etc. before more houses are built.

Sustainability strategy and level of housing growth proposed are deeply incompatible. Housing growth not matched by concurrent provision of local services, public

No action is required in response to specific comments from individuals.

Commenters have differing views on the level of new housing, particularly but not only at Berkhamsted. The Council has based its conclusions on striking a balance between town-generated population needs and environmental factors which constrain the delivery of those population (and housing) needs. The need for new

<p>transport etc.</p> <p>1,200 new homes in Berkhamsted will overwhelm schools, roads, services and character. Primary schools are already over-subscribed, there is already a second storey on the station car park and there is never going to be another bypass. The A41 is not satisfactory.</p> <p>Proposed growth of Berkhamsted considered disproportionately high and therefore unsustainable. Too skewed towards residential development.</p> <p>Level of growth proposed for Berkhamsted, Tring and the larger villages will negatively affect their character. Growth and redevelopment should be focused in Hemel Hempstead.</p> <p>Building 50 odd dwellings on Green Belt land at New Lodge, Berkhamsted will clearly have a significant impact on the character and the appearance of the countryside thereby directly contradicting policy. Proposed Egerton Rothesay development conflicts with policy in that building on the edge of town on high ground and at higher density than surrounding streets will detract from the town's unique valley setting which the core strategy seeks to retain.</p> <p>Policy for "areas of limited opportunity" is not applied consistently. Berkhamsted is treated differently to other market towns and large villages.</p> <p>Table 1 Section 2 (pg 43) states that Strategy for Areas of Limited Opportunity will "meet the demands of population stability". A stable population does not demand the number of new dwellings that are proposed in the plan and therefore the figure should be reduced significantly. Number of dwellings proposed in Shootersway/ Durrants Lane area should be 70 not 200.</p> <p>No building whatsoever should take place on Green Belt designated land. Greater emphasis is needed on the protection of Dacorum's Green Belt. Section 9 is deeply contradictory. Policies CS1 to CS7 are generally good, but at odds with paras 9.14-9.16, para 9.24, and paras 9.29-9.32.</p>	<p>housing is related to population stability <i>and</i> support for local community needs such as open space.</p> <p>Urban design is an important matter covered in Chapter 11 and Policies CS10-13. Character appraisals will guide new development: building density will be a more significant factor than the number of dwellings (and dwelling density).</p> <p>The role of the countryside (ref para 9.23) is protected by the development strategy (Policy CS1) and promoted through Policies CS5-7 and the countryside strategy (Chapter 27) in particular. Local allocations will have a specific site by site impact, but will not undermine the essential principle of the separation of settlements. The countryside strategy refers to local food production.</p> <p>The definition of affordable housing will be taken from the most up to date version of PPS3: Housing, which excludes market housing.</p> <p>Backland development is referred to in para 9.34 as part of the definition of infilling in Green Belt villages. The Council's approach, supported by the public,</p>
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<p>We should build upwards rather than building on agricultural land.</p> <p>Lack of consistency between para 9.23 - which says Hemel Hempstead's physical separation from smaller villages on its periphery will be maintained - and the inclusion of Marchmont Farm in the local allocations.</p> <p>Core Strategy does not go far enough in acknowledging the need to maintain and strengthen "areas of limited opportunity" through appropriate growth provision. General approach to "support development that meets the demands of population stability, unless a small element of growth is required to support local community needs" is insufficiently proactive in this respect.</p> <p>Policy CS6 (b) allows limited infilling for affordable housing for local people only. This unnecessary restriction on new housing will frustrate the provision of much needed housing to sustain shops, services and community facilities within small villages.</p> <p>Housing should meet local needs only.</p> <p>It is not possible to provide a safe environment to homes or businesses near Buncefield. No building within a certain distance of Buncefield should be permitted.</p> <p>Issue with definition of sustainable development in para 9.2. It is not the job of local council to be involved at international level.</p> <p>Issue with wording of Policy CS1. It should read as follows: "Any development must provide its own infrastructure.</p> <p>Piccotts End is not listed as a large or small village. Hence there is concern that it is included under Hemel Hempstead and that inappropriate development may take place.</p> <p>Paragraph 9.34 is ambiguous in its reference to backland development. It is not clear in what cases backland development is deemed acceptable. Each backland development should be considered on its merits.</p> <p>Para 9.34 does not reflect national policy which confirms</p>	<p>is to limit infilling (ref Question 4 in Annex A to Volume 4).</p> <p>Extensions to existing dwellings are controlled, taking full account of Government advice in PPG2 which indicates that proportionate extensions are appropriate development.</p> <p>The Water Cycle Scoping Report provides technical evidence on the water environment, and is reflected in Chapter 19.</p> <p>The Green Belt is a planning policy, whose purpose is to prevent unrestricted building development encroaching on the countryside. However, when deciding long term development needs (as to 2031), it is appropriate to consider the need to identify any Green Belt land for release. Land within the Green Belt as defined in the Local Development Framework should then be kept free from general building development.</p>
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that Intermediate Housing can include low cost homes for sale (PPS3 Annex B). Para suggests that affordable housing only consists of social rented, shared ownership and intermediate rented housing which is incorrect. Affordable housing can be provided by private sector bodies.

The Core Strategy does not properly address water resources, which a number of recent studies (e.g. the Colne Catchment Plan) have shown to be under extreme stress. Any residential or commercial development will increase water abstraction from the already over-extracted chalk aquifer below the borough. This is at odds with the sustainable development strategy. No further development should take place until the local water supplier in conjunction with DBC has demonstrated its ability to supply water without further lowering of the water table in the chalk aquifer.

More mention needs to be made about local food production.

Concern about how much influence Dacorum Planning Authority can exert over the routes and level of service offered by public transport operators. We must not end up sitting people many miles from the town centre, with intermittent or curtailed transport schedules. Hemel Hempstead has already reached the limit of reasonable public transport journey times. The Core Strategy should set out minimum standards for journey times, daily start and end times, and frequency on public transport routes.

Individuals who agreed made the following comments:

Policy CS4 supported, but explicit reference should be made to the intention to keep non-conforming uses to a minimum (which is implicit in para 9.18).

Policy CS6 supported but para 9.34 should stress that the criteria relating to local character, design and scale will be considered especially important in the case of all infilling. There needs to be a clearer definition of ‘backland development’ in the same para. As currently worded the policy appears to rule out all backland development, but not all backland development is inherently undesirable.

Controls should be reintroduced in relation to the extension of properties in village cores. House extensions have not been controlled in villages and this has resulted in the loss of small dwellings. Therefore the young and the old requiring smaller properties have been excluded from these villages. Furthermore, these large houses (5 bedrooms +) ruin village character.

Increasing the density on sites should require an assessment of the impact on mains water supply and drainage, as well as the problems caused by higher volumes of traffic on existing roads and junctions.

Berkhamsted is an “Area of Limited Opportunity” and “the general approach in these locations will be to support development that meets the needs of population stability”. This aim is supported. However the draft core strategy does not apply the stated approach to Berkhamsted in the same way as it applies them to other market towns and large villages. 200 dwellings on Durrants Lane/Shootersway site are not accepted. Disagree that Policy CS2 should not apply to the Durrants Lane/Shootersway site in Berkhamsted or Hicks Road, Markyate. Policy CS3 (a) should be amended to refer to “the adequacy of available infrastructure in the settlement”.

The approach to sustainable development should support the retention and use of Character Area Appraisals.

The Council should acknowledge and make more use of its position as a major purchaser of goods and services in terms of buying locally. It should do all it can to make its purchases from genuine local suppliers. The aim should be to keep as much of the money the Council spends within the local community. And the Council should encourage other local organisations and firms to do the same.

Whilst agreeing with the need for more housing within the borough the provision of places of worship and other community centres needs to be included in more of the Core Strategy’s policies. An increasing number of the population are actively involved in voluntary work and faith following. These people need centres within residential areas.

Bovingdon's inclusion as an "Area of Limited Opportunity – Large Villages" is supported.

High density development should only be supported when it is consistent with the Character Area Appraisal and preserves local character.

Berkhamsted's housing target is very high and not consistent with other market towns and large villages. The strategic site at Durrants Lane/Shootersway should not be increased from 100 to 200 dwellings.

Regeneration of Hemel Town Centre is essential but it is not clear how this is actually to be achieved.

Overall the Borough should focus more on 'hard' activities and essential services and less on creating Utopia.

Sport and leisure facilities will need to be improved in line with housing growth. This means more football pitches and tennis courts, etc. plus the refurbishment and maintenance of existing indoor and outdoor facilities.

Landowners

Landowners who disagreed made the following comments:

Object to the approach of limiting housing to meet only natural growth of Hemel Hempstead's population (Policy CS1). No allowance is made for accommodating a realistic level of population growth through in-migration. Migration is a key component of housing demand/growth. At the national level, the recently published [ONS] household projections show that migration will account for roughly 40% of projected growth in households between 2008 and 2033. The 2008 Strategic Housing Market Assessment states that "Dacorum is the largest net gainer from migration within the sub-region". Thus the definition of development at Hemel in Table 1 is too narrow.

The housing provision proposed is insufficient to meet the needs of the local population and in this regard is inherently unsustainable. It follows that, as higher levels of housing are required, Policy CS3, which seeks to hold back the

No action is required in response to most specific comments from landowners.

The biggest concern raised by landowners surrounds the level of housing development which is considered insufficient to meet natural population growth, accommodate in-migration and/or support business growth.

This is a question of balance between

<p>release of local allocations, is unduly constraining. At least the level of housing proposed in Option 2 is needed now and should not be subject to CS3. While the concept of reserve sites is accepted in principle, these should be additional to 'core' sites (local allocations) and of a sufficient capacity to meet the Policy CS17 requirement. Reserve sites should be identified over and above this base provision to be released as and when the former do not come forward.</p>	<p>population/ housing, jobs and the impact of new development on the environment/countryside around the towns. The Council must weigh up all the key factors and reach a conclusion. Dacorum is a Borough whose settlements are set within the Green Belt, and for over 30 years strategic plans have diverted housing growth away from the Borough, and away from the Metropolitan Green Belt. A continuation of this approach, whichever of the two housing options in the Consultation Draft was followed, is considered reasonable.</p>
<p>The strategy to manage local allocations as countryside prior to their release is not appropriate. Rather, the core strategy should make provision for amendments to the settlement boundary of towns and villages where local allocations are proposed in order to provide clarity and certainty. Furthermore, if the land is being considered for development beyond the plan period it could be safeguarded in line with guidance in PPG2 or allocated as 'white land' where it is intended to meet long-term development needs.</p>	<p>The Council has used nil-net migration household forecasts as one yardstick against which to make its decision on dwelling numbers.</p>
<p>Strategic Objective 7 relating to effective use of existing land and previously developed sites is dependent upon such sites being genuinely deliverable. Concern about Council's decision to confine strategic sites to just two. Guidance in PPS12 is that core strategies should allocate strategic sites where they are "central to the achievement of the strategy and where investment requires a long lead-in". Consideration of potential land release at Hemel Hempstead is clearly within this category. The Council should look more widely at the potential for strategic site allocation.</p>	<p>The Council is required to manage the supply of housing land, in collaboration with landowners and house-builders, and so can take account of development lead-in times.</p>
<p>Objection to proposed sequential approach (Policies CS2 and CS3). This notion has been eliminated from national policy in favour of an options based approach consistent with the priority attached to ensuring an adequate supply and range of housing opportunities. Certain greenfield sites may well be appropriate for an earlier release in terms of their wider objectives – in particular their contribution to sustainable development – or, as was recognised in the current Local Plan, the lead-in time needed to bring forward complex or large sites. A greenfield location could be considerably more sustainable than a brownfield site that does not have good access to facilities and services.</p>	<p>Policies CS2 and CS3 are robust and provide direction and flexibility, and encourage local input. The local community, as well as housebuilders, want some certainty: the majority want to avoid new building until</p>

<p>Policies CS2 and CS3 do not provide certainty and as a result are unsound. CS2 and CS3 should be combined, with (a) in Policy CS2 and (b), (c) and (d) in Policy CS3 all deleted.</p> <p>Policy CS3 is not considered an appropriate policy. This approach assumes that the Council can control when a site comes forward and does not take into account lead in times, which could be significant for an urban extension. The Council cannot control when a planning application is submitted for a site. Developers will be unwilling to undertake significant amounts of technical work in advance if there is no certainty that their site will definitely be needed.</p> <p>Policy CS2 is linked to Policy CS3 which deals with specified local allocations for housing. There should be no need to show the relative need for housing in the settlement (Policy CS3(b)). To secure certainty for developers and investors alike there should be a clearly defined and sufficiently robust supply of land identified up front to meet the housing needs.</p> <p>Policy CS2(c) should be replaced with the wording “ensure the most effective use of land which will contribute to local housing and socio-economic needs, responsive to local population and household growth”.</p> <p>Policy CS3(b) should be amended to read, “the relative need for development at that settlement based on a robust examination of natural population and household growth.”</p> <p>Policy CS3 should also allow for new neighbourhoods to be developed. “Locating development a safe distance from hazardous installations” is unnecessary and should be removed as it is a requirement for Dacorum to consult the Health & Safety Executive. The policy states that any new development should provide its own infrastructure. This is very vague and it needs to be made clear what type of infrastructure is included in this.</p> <p>Policy CS5: It is not clear from this how allocations for urban extensions are to be treated. Their location should be based on a review of Green Belt locations around Hemel Hempstead and through assessment of land against the</p>	<p>needed.</p> <p>In an environmentally constrained area, it is reasonable to maintain a broad sequential approach to land release. Strategic sites, local allocations and larger scale growth locations have been appraised in two separate publications – Assessment of Alternative Growth Locations for Hemel Hempstead (May 2009) and Assessment of Local Allocations and Strategic Sites (Oct 2010).</p> <p>Strategic sites are defined in para 9.16 as being needed in the short term.</p> <p>Policy CS35 elaborates policy on the provision of infrastructure.</p> <p>The Core Strategy will guide subordinate Development Plan Documents. Local allocations would be delineated in the Site Allocations DPD and removed from the Green Belt: their reserve status and/or intended delivery time would be indicated. Policy CS5 and delivery paragraphs will be amended to make this clear. Local allocations will normally be needed in the longer term, and so the Council has indicated what their interim use should be. Para 9.29 will also be amended to note there could also be minor</p>
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<p>five purposes of including land in Green Belts.</p> <p>Policy CS5 does not define ‘strategic’ or ‘small scale’ releases. This should be clarified, especially as the Council’s proposed housing targets (Options 1 and 2) are insufficient to meet the needs of the Borough during the plan period. This will require the further release of Green Belt land in a co-ordinated manner. As such, para 9.27 should be amended to read “A strategic review of green belt boundaries is not required, although small scale releases will be necessary to meet the development objectives of the plan and these releases will be dealt with as part of the Site Allocations DPD.</p> <p>A new paragraph should be inserted into draft policy CS5 to state: “Alteration to the Green Belt boundaries will be principally considered at Hemel Hempstead and Berkhamsted in order to accommodate strategic, sustainable development to meet local housing needs and deliver complementary regeneration benefits.”</p> <p>Policy CS5 relating to the Green Belt should note the need for amendments to the Green Belt adjacent to Hemel Hempstead. This is in order to accommodate local allocations in this area, where this is required to meet the housing needs of the population and is demonstrated to be appropriate having regard to the purposes of the Green Belt.</p> <p>Greenfield land will increasingly be required to meet housing targets. This is particularly in light of recent changes to PPS3 (garden land no longer classified as previously developed land and the removal of minimum densities for residential development) which will reduce the supply of housing on previously developed land.</p> <p>Some of the market towns and larger villages are more constrained than others, lying within areas designated as both Green Belt and AONB. In contrast, Bovingdon and Kings Langley are shown to be less constrained yet these settlements have the lowest housing allocation of the ‘places of limited opportunity’. Moreover, Bovingdon is a sustainable settlement containing numerous local services and facilities and being well connected to Hemel Hempstead. Development within the ‘places of limited</p>	<p>anomalies where a change to the Green Belt boundary might be justified as an “exceptional circumstance”. A local allocation could be the scale of a new neighbourhood, but more usually would be a small urban extension to a settlement.</p> <p>Major developed sites can be designated through the Site Allocations DPD, although countryside garden centres would not normally meet the criteria suggested in para 9.31 and PPG2: Green Belts (Annex C). They are not normally appropriate locations for new housing and employment/commercial development because of their impact on the countryside and because of the distance from services and facilities</p> <p>Economic targets are included in Chapters 12-14.</p>
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opportunity' should be skewed towards settlements such as Bovingdon which can accommodate growth with least detriment to areas covered by natural designations.

General approach set out in Table 1 for the 'areas of limited opportunity' provides only for 'population stability'. This is not supported as some growth is required in these locations to support local community needs; a figure to accommodate 'natural population growth' is considered more appropriate.

Berkhamsted cannot be defined within the same category as Tring (a much smaller market town) and the large villages within the borough in terms of accommodating future development growth. Berkhamsted should be recognised as a key market town which could accommodate sustainable, strategic development growth complementary to the future role of Hemel Hempstead (as a key centre for development change). "Market towns and large villages" should be replaced with "Tring and large villages" in the CS and Berkhamsted given its own category as a Market Town with "Strategic Development Opportunity".

Policy CS4 should be more specific as to why high densities are appropriate and should consider including a range of targets to provide greater certainty to developers, otherwise the definition of 'high' is open to interpretation.

The spatial strategy should also respond to the needs of 'other' settlements in the District. Policy CS1 will not allow the development needs of market towns such as Tring to be met. We would support Option 2 housing figures across the Borough and subsequently more allocations in Tring to strengthen its role as the third largest town in the Borough and as a service centre in the north of the Borough.

There is no clear policy on the distribution of development around the Borough. For example: Hemel Hempstead 68%, Berkhamsted 16%, Tring 10%, Bovingdon 1.5%, Kings Langley 1.5% and Markyate 2.5%.

Landowners who agreed made the following comments:

The Core Strategy should be amended to include reference to the need to bring forward the identified strategic sites at

the early stage of the plan process. Having regard to the approach to strategic site allocations that is used by other local planning authorities, a new policy could be added, against which an application for development of the sites could be assessed.

Further clarity is sought within sections 9.27 and 9.32 which refer to the Green Belt. It could be made clearer that additional Major Developed Sites may be designated in accordance with national policy guidance in PPG2.

The Tring Wyevale Garden Centre site, off Bulbourne Road, should be added to the list of Major Developed Sites in the Green Belt, as set out within Table 2, pg 51. This site could provide an opportunity for new development, for example for housing or employment uses.

Support for designation of Markyate as a 'large village' which is identified as having an important role in meeting housing needs and providing employment opportunities and services both for their residents and adjacent rural communities.

Support for identification of Hicks Road as a strategic site as it provides opportunity to accommodate the majority of the village's future growth. Agree with Council's statement that the Hicks Road site's "short term development is fundamental to the delivery of the Place Visions."

Other comments from landowners:

Indicators and targets are heavily biased towards housing provision. A broader suite of indicators and targets is needed. Reference should be made to provision and uptake of employment floorspace, business migration to and from the area, and employment growth.

More sites within the traditional built-up area of Hemel Hempstead need to be identified to provide the required number of dwellings under Option 2 and thereby relieve the pressure on the Green Belt. Would especially welcome Site B Apsley Mills being identified for residential development. It is acknowledged that this site forms part of an Employment Zone and has outline consent for office development. However the recently completed Roger Tym

<p>study advises that the local market for office floorspace is characterised by an oversupply of available office floorspace together with a weak demand for floorspace. The focus on strategic office locations in the town centre and Maylands is welcomed but needs to be balanced by a redesignation off more marginal office locations to enable residential development to meet the Option 1 and 2 targets.</p>	
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Enabling Convenient Access between Homes, Jobs and Facilities

QUESTION 4

Do you support the approach to 'Enabling Convenient Access between Homes, Jobs and Facilities' set out in Section 10?

Responses received 55

Yes - Key organisations 9 (inc. 4 duplicates)
 Individuals 19
 Landowners 6
Total 34 responses

No clear answer:
 Key organisations 0
 Individuals 0
 Landowners 0
Total 0

No - Key organisations 2
 Individuals 18
 Landowners 1
Total 21 responses

Response

Actions

There was general support demonstrated for the approach set out in the section.

Responses from key organisations:

The Highways Agency:

The level of development proposed is sufficient to warrant a strategic traffic assessment. This must be capable of assessing the cumulative effects on Hemel Hempstead, Markyate, Kings Langley and potentially Berkhamsted. It should incorporate key Strategic Road Network junctions in addition to local road networks. The assessment could involve the use of either the DIAMOND or PARAMICS modelling tools and take into account the potential combined effects of development occurring in neighbouring authorities, especially in the St Albans district.

If the resulting scale of additional traffic is considered significant junction capacity assessments should be undertaken. They should identify if there is sufficient spare capacity, and where not, suitable mitigation measures should be identified (potentially to be funded by developers). The Highways Agency also recommends the effects of the proposed North East Hemel Hempstead Relief Road are assessed.

Strategic traffic assessments have been undertaken by the County Council (as local highway authority). The Paramics Model has been used to test the effects of growth at Hemel Hempstead.

The issues are appropriately considered in the East Hemel Hempstead Action Plan. The scale of proposals will be proportional to the needs of Maylands Business Park and the town. The HGV route is actually the North East Hemel Relief Road – a

<p>The New Conservation Society:</p> <p>Welcome giving greater emphasis to pedestrians, but they suggest the Council under the delivery section needs to also tackle parking on pavements, working vehicles used for journeys to work, and high household car ownership reliant on unregulated on-street parking.</p> <p>Bovingdon Parish and Tring Town Councils support the approach set out in the chapter.</p> <p>The Chilterns Conservation Board:</p> <p>Welcomes reference to the impact of development and traffic on the safety and character of country lanes (Policy CS9) and reference to the support for the “Environmental Guidelines for the Management of Highways in the Chilterns”.</p>	<p>current proposal in the Local Plan and part implemented. The relief road was initially, justified through the Hemel Hempstead Transportation Study (1992-95) and has the support of the local highway authority. It has been tested in the Hemel Hempstead Transport Model (2009/10). The exact alignment and deliver of the road will be considered further with the Highways Agency and St. Albans Council and others. The development of Spencers Park and completion of this road are linked.</p> <p>Comments noted, but no action required. It is accepted that management of parking is an important issue in some areas, normally tackled through policies and programmes in the Local Transport Plan.</p> <p>Comment noted, no action required. Support welcomed.</p> <p>Comment noted, no action required. Support welcomed.</p>
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<p>The Friends of the Earth:</p> <p>Supports approach providing there is an excellent public transport system, and walking and cycling get maximum support and funding.</p> <p>Hertfordshire Chamber of Commerce and Industry:</p> <p>Supports the objectives but doubts there will be change until public transport offers the same convenience, flexibility and choice as the car. Bus companies, businesses and workers all need to be involved to ensure the change is successful.</p> <p>Markyate Parish Council:</p> <p>Supports the approach, but points out that public transport is not always suitable for journeys to work. The car is often the only practical form of transport. Rural communities are dependent on the car (as demonstrated in their Parish survey), particularly as bus services are infrequent.</p> <p>The Natural History Museum are supportive, but stress that the Core Strategy should recognise that the existing parking provision and accessibility of the site by car is key to encouraging visitors to the Museum.</p> <p>Nettleden with Potten End Parish Council offer their support, but refer to the need to promote safer rural roads.</p>	<p>Comment noted, no action required. Support welcomed.</p> <p>Comment noted, no action required. The Core Strategy seeks to promote public transport as an alternative to the car, but there will still be a role for the car. It is acknowledged that those affected by change should be involved in the process of that change.</p> <p>Comment noted, no action required. Accept that private transport is important in rural locations, although there are still some who rely on other forms of travel.</p> <p>Comment noted, no action required. It is accepted that access by car is important. The Core Strategy is not proposing any changes to parking arrangements in Tring town centre, although as a matter of principle it would also encourage trips by alternative means of transport.</p> <p>Comment noted, no action required. Policy CS9 does refer to promoting the safety of country lanes.</p>
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<p>Tring Rural Parish Council:</p> <ul style="list-style-type: none"> • Supports the approach. • They refer to the need to look at village travel plans. • Public transport is inadequate and rural lanes are unsafe for pedestrians and cyclists. • Electric cars should be encouraged given that car travel will remain important in rural areas. <p>Responses from individuals:</p> <p><i>Individuals who disagreed made the following comments:</i></p> <p>The transport infrastructure is inadequate. Improvements need to be put in place before new development occurs. Object to Policy CS9 as improved infrastructure should come before further development in the borough.</p> <p>Car users should be given priority. Current measures to support non-car users are ineffective and wasteful. The approach in the section fails to address the poor condition of minor roads. Hemel Hempstead should not be allowed to enlarge.</p> <p>Support for sustainably located development.</p> <p>The Council will be unable to deliver this approach. It is promoting development in Berkhamsted that continues to give priority to the car and is not accessible for non-car users.</p> <p>Businesses and housing should be located within walking</p>	<p>Comment noted. The use of alternative means of fuel is an important point and will be reflected in para 10.2.</p> <p>Comment noted, no action required. The Core Strategy seeks to ensure that infrastructure is in place to offset the impact of new development (Policy CS35).</p> <p>Comment noted, no action required. The car has significant costs to the environment and its impact needs to be addressed. The management and maintenance of roads is a matter for the local highway authority, partly through the Local Transport Plan.</p> <p>Comment noted, no action required. Support welcomed.</p> <p>Comment noted, no action required. The housing allocations in Berkhamsted are reasonably accessible and opportunities for non-car travel would also be encouraged.</p> <p>Comment noted, no</p>
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<p>distance to facilities. Smaller and scattered businesses may be better than a large industrial estate with limited housing.</p> <p>All road users should be given equal priority. Roads should primarily be used for through movement and not on-street car parking.</p> <p>Development should be encouraged in less densely populated areas. Public transport will increase individual journey times, there is a limit to what you can reasonably manage to carry, and is too expensive. People are shopping in out of centre locations because car parking in town centres is too expensive. The approach is elitist and only those well off will be able to travel in the future. The Council as a whole should lead by example.</p> <p>The proposed future housing at Green Lane, Hemel Hempstead runs contrary to Policy CS9.</p>	<p>action required. The Core Strategy aims to ensure homes and jobs are well connected with local facilities.</p> <p>Comment noted, no action required. The car has environmental costs and therefore other less harmful means of transport need to be given priority. The management of parking is an important issue in some areas, normally tackled through policies and programmes in the Local Transport Plan.</p> <p>Comment noted, no action required. The Core Strategy encourages development proportionate to the scale and role of settlements rather than their density. Public transport should be encouraged as an alternative to the car. It is acknowledged that public transport is not always suitable and convenient for all journeys.</p> <p>Car parking charges are a means of managing demand, and are usually set to encourage visitors to a centre. However, charges themselves are not a matter for the Core Strategy.</p> <p>Comment noted, no action required. The proposal is reasonably</p>
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<p>The whole approach continues to give priority to car users. The Council should do more to discourage car use, e.g. introducing a congestion charge.</p> <p>There needs to be stronger parking control over houses in multiple occupation and commercial vehicles in residential areas.</p> <p>Existing schemes to reduce car use have been ineffective as they do not work in practice. The Government should do more to encourage car manufacturers to reduce emissions and promote affordable electric/hybrid cars. Bus lanes are ineffective and more should be done to improve the condition of local roads. Vehicles parking on pavements are a problem. This will worsen as housing density is increased unless adequate parking facilities are provided.</p>	<p>accessible and can be safely accommodated on local roads.</p> <p>Comment noted, no action required. The Core Strategy gives priority to non-car users, although recognising there is still a role for private transport. Any measures to discourage car use must be proportionate and reasonable.</p> <p>Comment noted, no action required. Parking standards cannot be applied retrospectively. The Core Strategy seeks appropriate levels of parking with all new development (Policy CS8).</p> <p>Comment noted, no action required. The success of schemes does vary, although this should not undermine the need to address the impact of the car on the environment. The role of the Government in promoting electric/hybrid cars is acknowledged. The management of bus lanes and the condition of local roads are the responsibility of the County Council as local highway authority. Vehicle parking on pavements is a different and often difficult enforcement issue, though the Core</p>
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<p>Car travel will remain important until public transport is improved and run for the benefit of the community. New vehicles are becoming more environmentally friendly. Provision should be made for electric cars at home and in the workplace. The aim is broadly acceptable, but a vigorous approach to improving public transport, particularly bus services, is needed to realise the vision. A review of bus services in Dacorum should be planned for. The number of journeys made by public transport should be included in the list of indicators/targets.</p> <p>New housing developments only lead to greater car usage.</p> <p>Policy CS8 represents a set of unaffordable ideals. Firmer measures are required that are better costed. The best way to reduce car usage is to ensure that work, shopping and leisure facilities are close to home. This implies that residential growth and public travel patterns should be focussed on the Maylands business area, and neighbourhoods should provide a greater range of facilities. Journey times across Hemel Hempstead are already very inconvenient and any further outward expansion is going to worsen this.</p>	<p>Strategy seeks to help by ensuring new development provides adequate parking.</p> <p>Comment noted, no action required. The Core Strategy supports improvements to passenger transport in conjunction with the County Council. However, responsibility for the service lies chiefly with the operators. Passenger transport can be reviewed by the County Council, particularly through the Local Transport Plan.</p> <p>Comment noted, no action required. The Core Strategy can only promote opportunities for making journeys other than by the car; it cannot force residents to use them.</p> <p>Comment noted, no action required. The locational principles (for development) suggested by the commenter are embedded in the Core Strategy. Maylands and North East Hemel Hempstead is a focus for development, but other locations may be appropriate too. New public transport investment may either not be needed, or can be planned to serve these locations. Key infrastructure requirements are detailed and costed</p>
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<p>Individuals who agreed made the following comments:</p> <p>There is a need to promote safer rural roads and reduce traffic through villages.</p> <p>The public transport indicator to Policy CS9 is inappropriate as 30 minutes is far too long to travel to school or the GP.</p> <p>The Strategic Allocation at Shootersway / Durrants Lane would only encourage rather than discourage the use of private transport.</p> <p>In order to move towards a reduction in car dependency bus services and associated infrastructure needs to be improved. Transport infrastructure is poor and needs to be improved.</p> <p>Until public transport is significantly improved, private car travel still needs to be considered along with ample and affordable parking at key destinations.</p> <p>Support aims, but insufficient details have been provided on how existing bus services will be improved e.g. real time information at bus stops.</p>	<p>(where appropriate) in the Hertfordshire Infrastructure and Investment Strategy and the Dacorum Infrastructure Delivery Plan. The approach is made up of larger and smaller scale measures.</p> <p>Comment noted, no action required. Policies CS8 and 9 seek to achieve these aims.</p> <p>Comment noted, no action required. This is based on a nationally derived indicator and is available.</p> <p>Comment noted, no action required. See also responses to Question 18.</p> <p>Comment noted, no action required. The Core Strategy seeks to deliver infrastructure improvements through new development.</p> <p>Comment noted, no action required. Policy CS8 already seeks to achieve appropriate levels of parking. The cost of parking is not a Core Strategy Issue.</p> <p>Comment noted, no action required. Detail is more appropriate to other documents, particularly to the Local Transport Plan and Urban Transport Plans for the towns.</p>
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<p>There needs to be specific reference to the maintenance and increase of Rights of Way, particularly for horse carriage drivers.</p> <p><i>Some respondent raised points not directly related to the aims or the vision:</i></p> <p>The new health centre at the hospital is supported, but other buildings are not being used to their full potential.</p> <p>It is dangerous to regenerate jobs at the Maylands business park because of its location close to the Buncefield Oil depot.</p> <p>Responses from landowners:</p> <p>Banner Homes, Gleeson Strategic Land, Taylor Wimpey, and Grand Union Investment all support the approach set out in the chapter.</p> <p>Barratt Strategic:</p> <ul style="list-style-type: none"> Strongly agrees that new development should be brought 	<p>Amendments are required to Policy CS8. Reference will be made to the rights of way network both here and in the Countryside Strategy.</p> <p>Comment noted, no action required. The Core Strategy encourages, where possible, effective use of land and buildings. However, the ultimate use of buildings is down to landowners and the state of the property market.</p> <p>Comment noted, no action required. The Council will have regard to the COMAH regulations and advice of the Health & Safety Executive. Safety is the key issue. The risk to safety declines further away from the site. Currently housing should not normally be built within 400m while employment development can be much nearer, most up to 150m away.</p> <p>Comment noted, no action required. Support acknowledged.</p> <p>Comment noted, no</p>
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<p>forward in sustainable and accessible locations and consider that new housing at West Hemel Hempstead support the principles of Policy CS8.</p> <ul style="list-style-type: none"> • The housing allocation will improve connectivity, the local highway and public transport services. It will also support Policy CS9 and assist in relieving local congestion. <p>ING Real Estate Investment Management supports the approach, particularly Policy CS8 and CS9.</p> <p>The Crown Estate:</p> <p>Object to Policy CS8. The wording in these policies may be more appropriately included in the development management DPD.</p>	<p>action required. See also responses to Question 16.</p> <p>Comment noted, no action required. Support acknowledged.</p> <p>Comments noted, no action required. The policy establishes key strategic movement principles that are appropriate for the Core Strategy.</p>
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Securing Quality Design

QUESTION 5

Do you support the approach to 'Securing Quality Design' set out in Section 11?				
Responses received	52			
Yes -			No clear answer:	
Key organisations	12		Key organisations	0
Individuals	20		Individuals	1
Landowners	5		Landowners	2
Total	37 responses		Total	3
No -				
Key organisations	4			
Individuals	8			
Landowners	0			
Total	12 responses			
Response		Actions		
<p>Organisations</p> <p><i>Organisations who have disagreed made the following comments</i></p> <ul style="list-style-type: none"> Chipperfield Parish Council - No specific reference to Village Design and the role of Village Plans and Villages Design Statements. 		<p>The Council's urban design policies are linked to the issue of Sustainable Design and Construction (Policy CS29 in particular). They will also be supported by other policy statements, for example Urban Design SPD and development management criteria. Existing policies, for example, on lighting, landscaping and security will remain in force. Detail suggested by some commenters is therefore unnecessary in the Core Strategy, although the comments they make are generally accepted.</p> <p>See response under question 30. Reference to Parish Plans and other advice will be made.</p>		

<ul style="list-style-type: none"> • Hertfordshire Police Authority -Provide reference to the 'Secure by Design' publication which will assist in increasing community safety and minimising opportunities for crime and anti-social behaviour through design. Amend Paragraph 11.10 as follows: "Successful towns and villages should be designed so that they are pleasant <u>and safe</u> place to live, work and visit." • Hertfordshire County Council - There are positive links between the WCS & DM Policies document and Dacorum's Core Strategy preferred options with the need to secure quality design. The use of recycled materials should also be included, where possible. 	<p>Comment noted. Amend delivery section to refer to other policies and design statements. The Development Management DPD will refer to safety and secure by design.</p> <p>Comments noted. The use of recycled materials will be encouraged through Policies CS28 and 29 and the use of sustainability statements.</p>
<p><i>Organisations who have agreed made the following comments</i></p>	
<ul style="list-style-type: none"> • Hertfordshire Biological Records Centre - There should be some mention of the need to avoid light pollution following ILE guidelines in respect of Environmental Lighting Zones and standards for appropriate equipment and design; and use of a 'natural security' approach as part of sensitive landscaping. 	<p>Comment noted. Amend delivery section to refer to other policies and design statements. The Development Management DPD will refer to light pollution. Light pollution is also referred to in Policy CS32 and the countryside strategy</p>
<ul style="list-style-type: none"> • Friends of the Earth – Houses should be powered by renewable energy. 	<p>Comments noted. Policy CS29 refers to Sustainable Design and Construction and Policy CS28 to an energy hierarchy. The use of renewable energy is covered.</p>
<ul style="list-style-type: none"> • Bovingdon Parish Council, British Standards Institute, Chiltern Conservation Board, CPRE Hertfordshire – no comments made. 	<p>Noted.</p>
<ul style="list-style-type: none"> • Hertfordshire Chamber of Commerce & Industry – as long as buildings aren't designed the same. 	<p>Comment noted. This is unlikely, since there are a range of local materials designed into buildings throughout the borough. There is a range of residential</p>

<ul style="list-style-type: none"> • Natural England – We welcome the clear attempts to move away from the car and the emphasis on wildlife corridors. • Nettleden and Potten End Parish Council , and Tring Town Council – no comments made. • Tring Rural Parish Council - We have been promised conservation area appraisals for at least six years but they have yet to be undertaken. Local people and parish councils should be fully involved in such appraisals and they need to be given weight when planning applications are considered. I don't know how Dacorum are planning to fund these appraisals and the timescales involved so am sceptical about what impact this will have. But I do support the vision, as it would bring some cohesion to the local environment. <p><i>Other comments from organisations</i></p> <ul style="list-style-type: none"> • Markyate Parish Council - There has been particular concern that the historic archways, which gave rear access to stabling etc in the conservation area, have been filled in using the permitted development within the property rule - we would seek to preserve those that remain. Flowerdale is the last remaining 'yard' and should also be protected. We would seek to incorporate this protection in the supplementary document mentioned in Policy CS11 or by having our Parish Plan adopted. <p>Individuals</p> <p><i>Individuals who have disagreed made the following comments</i></p> <ul style="list-style-type: none"> • Agree with the principles but all previous developments have been out of character with the historical significance of the area. • Section 11 states that Local Character Areas will be replaced by Urban Design Assessments. I agree with the Berkhamsted Town Council view that Character 	<p>character areas, shopping areas and business areas that are diverse in nature. External factors will influence the design of buildings too.</p> <p>Comment noted. No further action.</p> <p>Noted.</p> <p>Comments noted. Further information about the Conservation Area Appraisals will be published online and in the Dacorum Digest.</p> <p>Comment noted. This detail should be included within the Markyate Conservation Area Appraisal.</p> <p>Support for principles noted.</p> <p>Noted. Relevant information within the Character Area Appraisals will be</p>
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<p>Area Assessments should remain as a source of planning guidance.</p> <ul style="list-style-type: none"> • The present draft of the Urban Design Assessment would significantly alter the character of the town by increasing the density of development. For example, in Peripheral Zones, large setbacks become medium setbacks, detached goes to semi-detached, and there is mention of "block sites". CS10 paragraph (c) "Promote higher densities in and around town centres and local centres" is not appropriate. • The proposed approach omits the very important "key principles" for design that were set out in the June 2009 Spatial Strategies for each town, as part of the Emerging Core Strategy. These principles specified housing density rules for the various locations within each large town and village - for example, low density for the upper valley sides in Berkhamsted - and as such these principles must be retained permanently. As currently written, chapter 11 of this Draft Core Strategy, and subsequent chapters, are proposing much greater housing densities • In paragraph 11.14 CS11 in paragraph (a) the word "enhance" in respect of densities is not appropriate and should be deleted. • Policy 120 of the Local Plan and design based appendices should remain intact. 	<p>updated as appropriate and incorporated into the Urban Design SPD.</p> <p>Noted. A balance has to be found between delivery of housing and maintaining local character. This will be developed further through the Urban Design SPD. Higher densities are currently promoted in central locations.</p> <p>These key principles were taken from the Urban Design Assessments, 2006. The principles relating to the density of development will be taken forward through the Urban Design SPD and Development Management Policies.</p> <p>Agreed. Amend text.</p> <p>Policy 120 is currently saved. Any changes will be addressed through the Urban Design SPD and Conservation Area Appraisals.</p>
<p><i>Individuals who have agreed made the following comments</i></p> <ul style="list-style-type: none"> • Reference should be made to policy CS28 and CS29 as there is good design/sustainability principles in these policies such as minimising water consumption. • Planning Officers should be more willing to reject poor design and listen more to the views of Parish Councils who are trying to protect the character of their areas. Planning applications should not be 	<p>Amend text in Figure 13 to provide a link to Section 19 and Policies CS28 and 29.</p> <p>The principles of design need to be interpreted consistently. The Urban Design SPD will help.</p>

<p>determined on the basis of speed and fear of an appeal.</p> <ul style="list-style-type: none"> • Keep the Hemel Hempstead town centre and its facilities clean. • Agree only in principle, because I have no confidence that the strategy will deliver what it is promising. It seems a bit aspirational given the current and foreseeable economic climate. • Need to provide lots of cheaper accommodation for young people to keep them in the area. • However, the Council is ignoring its own policy. Since the Egerton Rothesay School development should be aiming to ‘integrate with the character of the existing street pattern’, but this is being ignored. <p><i>Other comments from individuals</i></p> <ul style="list-style-type: none"> • Can we please guarantee that tree planting in future will be of species which will not lead to trip hazards (roots which raise the footpaths), obscured street lights, residents being forced to use electric lights all day long, etc. <p>Landowners</p> <p><i>Landowners who have disagreed made the following comments</i></p> <p><i>Landowners who have agreed made the following comments</i></p> <ul style="list-style-type: none"> • Banner Homes Limited, Taylor Wimpey UK LTD, ING Real Estate Investment Management and 	<p>Maintenance of the public realm (including Hemel Hempstead Town Centre is covered in para 11.17.</p> <p>Support for the policies is noted. It is accepted that delivery is critical.</p> <p>Comment noted. The point is accepted. Affordable housing policy (CS19) helps to address this issue.</p> <p>Comment noted. The development of this site can respect the existing street pattern. Building density is a separate issue. The site is both large enough to take on its own character or respect adjoining character: there are two different urban design zones adjoining the site.</p> <p>Comment noted. Detailed guidance on tree planting will be covered in supplementary advice.</p> <p>None</p> <p>Noted.</p>
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<p>Gleeson Strategic Land (Yes)</p> <ul style="list-style-type: none"> Barratt Strategic (Yes) - Reference should also be made in Policy CS10 with regard to the proposals for the local allocations given their unique position with respect to large scale development. <p><i>Other comments from Landowners</i></p> <ul style="list-style-type: none"> Akzo Nobel Pension Scheme - With regard to Policy CS12, we ask that the Council ensures its approach to site design quality is sufficiently flexible so as to not constrain development and therefore amends the policy to: "On each site development should seek to". With regard to (d) we ask that trees with amenity value, as identified through independent assessment, that are lost through development are replaced. Grand Union Investments – No comments made. 	<p>The design principles for local allocations will be considered initially in the Site Allocations DPD.</p> <p>Noted. The criteria should be expressed clearly, hence minor wording changes. Good quality design should enhance development rather than constrain it. The Council uses expert advice on matters concerning trees.</p> <p>Noted.</p>
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Strengthening Economic Prosperity

QUESTION 6

Do you support the approach to ‘Strengthening Economic Prosperity’ set out in Section 12?

Responses received 43

Yes -	Key organisations	9	No clear answer:	
	Individuals	15	Key organisations	2
	Landowners	6	Individuals	1
	Total	30 responses	Landowners	2
			Total	5
No -	Key organisations	1		
	Individuals	4		
	Landowners	2		
	Total	8 responses		

Response

Actions

Organisations:

Organisation that disagreed made the following comments:

The New Conservation Society suggest:

- preferential treatment for enterprises that prolong the life of consumer goods
- encouragement of best packaging practices
- preferential treatment for enterprises that use local IT support rather than import workers from abroad.

Organisations that agreed made the following comments:

Bovingdon Parish Council supports the strategy subject to a level of employment growth in Bovingdon which supports a stable, active and vibrant community.

Nettleden with Potten End Parish Council supports the strategy but requests that employment opportunities in villages are promoted.

Hertfordshire County Council (Hertfordshire Property) suggests that paragraph 12.11 is amended to reflect the synergies between the Green Energy Centre and an In Vessel Composting Facility. They also suggest that policy CS15 is amended to allow for waste related sui generis uses within General Employment

Comment noted. The Core Strategy supports the County Council’s waste policies, including waste minimisation and recycling (ref paras 19.35 – 19.38).

Comment noted, no action required. The Bovingdon Place Strategy and Policies CS1 and CS14 already seek to ensure this.

Comment noted, no action required. Village and rural employment is supported by para 12.7 and Policies CS1 and CS14.

Text in para 12.12 has been amended to refer to possible links between Green Energy Centre and other linked facilities. The precise nature of the

<p>Areas.</p> <p>Hertfordshire County Council (Environment) supports the promotion of decentralised renewable energy generation.</p> <p>Hertsmere Borough Council, Tring Town Council and the British Standards Institute support the approach</p> <p>The Hertfordshire Chamber of Commerce & Industry suggests:</p> <ul style="list-style-type: none"> • that in the absence of BusinessLink and EEDA the Core Strategy should include some support for existing businesses • as DBC can't create jobs, its aims should be to get new businesses into the area through inward investment. To encourage this, the Council must create conditions to ensure that the local workforce has the right skills and that Dacorum is a desirable place to live <p>Friends of the Earth support the transition to a low carbon economy, but oppose the reconstruction of Buncefield Oil Depot.</p> <p><i>Other comments from organisations:</i></p> <p>Markyate Parish Council states that Maylands is only accessible</p>	<p>Green Energy Centre will be considered through work on the Area Action Plan. Waste related 'sui generis' uses can be considered through the Site allocations DPD, in particular whether any change to existing employment area policy is appropriate.</p> <p>Support welcomed.</p> <p>Support welcomed.</p> <p>Comment noted, no action required. The Core Strategy supports existing businesses through Policies CS14 and CS15.</p> <p>Comment noted, no action required. Policy CS14 supports initiatives that help the local workforce develop their skills. The Core Strategy aims to ensure that the borough is a desirable place to live – see the borough vision and strategic objectives.</p> <p>Comment noted, no action required. The Health and Safety Executive's advice regarding Buncefield has been followed by the Council. The Council consulted on future options for the oil depot as part of consultation on the Area Action Plan. Closure, or preventing the reconstruction of the depot in some form, are not realistic options due to its strategic importance and the lack of an alternative replacement facility.</p> <p>Comment noted. The Vision of East Hemel</p>
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<p>by public transport for those living in Hemel Hempstead.</p> <p>Three Rivers District Council considers that the jobs and office floorspace targets are too high and not clearly justified.</p> <p>Individuals:</p> <p><i>Individuals who disagreed made the following comments:</i></p> <p>The 18,000 jobs figure in the Draft Core Strategy was calculated during the economic boom and is based on the housing target in the Regional Spatial Strategy, which is significantly higher than either of the housing target options in the Draft Core Strategy.</p> <p>Having such a high jobs target with a low housing target will increase pressure on house prices.</p> <p>Maylands should not be enlarged. The town centre improvements can be made without any housing or employment growth.</p> <p>Maylands should not be expanded because of the threat imposed by Buncefield.</p> <p>More people should be encouraged to work from home rather than building new employment buildings.</p>	<p>Hempstead (p141) aims to improve passenger transport connections to Maylands. This approach is supported by Policy CS8.</p> <p>Reduce jobs target to reflect new technical evidence.</p> <p>Reduce jobs target to reflect new technical evidence.</p> <p>Reduce jobs target to reflect new technical evidence. The Option 2 (higher) housing target has been selected (ref Question 9).</p> <p>Comment noted, no action required. Regeneration of Hemel Hempstead Town Centre does not rely on enlarging Maylands. The Maylands Business Park plays an important role in the economy at both a local and sub-regional level and its regeneration and expansion are essential to achieve the Core Strategy's vision and objectives.</p> <p>Comment noted, no action required. See response to Friends of the Earth above.</p> <p>Comment noted, no action required. Para 15.29 provides support for live-work units, but notes that there appears to be a lack of demand in Dacorum. More informal methods of home working are not something which can be directly controlled through local planning policies.</p>
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<p><i>Individuals who agreed made the following comments:</i></p> <p>The Core Strategy should encourage a more diverse economy and promote employment in villages.</p> <p>Support for the promotion of a low carbon economy.</p> <p>Consideration should be given to lowering the rents where there are lots of empty business premises.</p> <p>The Core Strategy should be more proactive in attracting industry to the area.</p> <p><i>Other comments from individuals:</i></p> <p>More than one job creation scenario should be included.</p>	<p>Comment noted, no action required. The Core Strategy promotes a diverse economy as it does not rely on a particular sector. Promotion of employment in villages is supported by Policies CS1 and CS14, para 12.7 and through the place strategies.</p> <p>Support welcomed.</p> <p>Comment noted. Most business premises are privately owned and rent control is not normally a planning issue.</p> <p>Comment noted. The Core Strategy issue. The Core Strategy sets the framework supporting new business and industry. The Dacorum Development Programme and the Economic Development Strategy, which sit below the Core Strategy, set out how the Council will attract businesses to Dacorum. The Council put forward a bid to create an Enterprise Zone at Maylands which would have helped raise the profile of the area as a business location and attract inward investment and business growth. Although this bid was not successful, some of the proposals it contained will still be implemented – albeit over a longer timeframe.</p> <p>Technical work has assessed the most appropriate jobs target for different housing levels.</p>
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<p>Landowners:</p> <p><i>Landowners who disagreed made the following comments:</i></p> <p>DLP Planning Ltd point out that the jobs target is based on the housing levels in the East of England Plan, which no longer apply to Dacorum.</p> <p>DLP Planning Ltd and Gleeson Strategic Fleet state that the relationship between housing and employment is not considered properly – the employment targets are too high in the context of the housing targets. If implemented, this would lead to higher house prices, more in-commuting and more congestion on the roads. This is at odds with the aim to move to a low carbon economy.</p> <p>DLP Planning Ltd supports the jobs growth target as it reflects Hemel Hempstead’s strategic role in employment provision. However, they suggest that the housing target should to be raised to improve the balance between the two.</p> <p><i>Landowners who agreed made the following comments:</i></p> <p>Sainsburys welcomes the strategy and aims to be involved in the future growth of Hemel Hempstead and Dacorum.</p> <p>Banner Homes, USS, Winreb Finance and ING Real Estate support the approach.</p> <p>Barratt Strategic supports the jobs growth target as it reflects Hemel Hempstead’s strategic role in employment provision. However, they suggest that the housing target should to be raised to improve the balance between the two.</p> <p>Barratt Strategic support the identification of Hemel Hempstead as the main focus for new economic development uses.</p> <p><i>Other comments from landowners:</i></p> <p>Akzo Noble Pension Scheme note that the document does not</p>	<p>The aim is to achieve a broad balance between homes and jobs.</p> <p>The jobs target has been reduced to reflect new technical evidence. There is a broad balance between the provision of new homes and jobs.</p> <p>See above.</p> <p>See above.</p> <p>Support welcomed.</p> <p>Support welcomed.</p> <p>See response to DLP Planning Ltd above. The jobs target has been reduced and set in the context of new homes planned and the economic aspirations for the area. It is considered to adequately reflect both.</p> <p>Support welcomed.</p> <p>Reduce jobs target to reflect new technical</p>
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<p>reflect the most up to date evidence base (the South West Hertfordshire Employment Land Update, June 2010).</p> <p>Akzo Noble Pension Scheme express concern that the move towards a low carbon economy may be onerous financially for developers.</p>	<p>evidence.</p> <p>Comment noted, no action required. Where developers have viability concerns, these will be dealt with through the planning application process. Section 29 sets out the approach to developer contributions and how viability issues will be addressed.</p>
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Providing for Offices, Industry, Storage and Distribution

QUESTION 7

Do you support the approach to 'Providing for Offices, Industry, Storage and Distribution' set out in Section 13?				
Responses received	41			
Yes -			No clear answer:	
Key organisations	9		Key organisations	0
Individuals	13		Individuals	1
Landowners	3		Landowners	2
Total	25 responses		Total	3
No -				
Key organisations	2			
Individuals	6			
Landowners	5			
Total	13 responses			
Response		Actions		
<p>Organisations:</p> <p><i>Organisation that disagreed made the following comments:</i></p> <p>Hertfordshire County Council (environment) request that Policy CS15 acknowledge that waste sites could be located within GEAs (in line with what is sought by the Hertfordshire Site Allocations document).</p> <p>St Albans City and District Council state that the scale of jobs growth and the quantity of floor space within Policy CS15 appear excessively high given the evidence in the Hertfordshire London Arc Employment Study. If these levels are pursued there may be a significant increase in out-commuting from St Albans District to Dacorum.</p> <p><i>Organisations that agreed made the following comments:</i></p> <p>Nettleden with Potten End Parish Council states that there is too much emphasis on office floorspace and consider that the strategy should encourage small businesses and starter units more.</p> <p>EEDA ask that the Council provide clear job targets in policy to</p>		<p>No change required. See response to Question 6 – Economic Prosperity.</p> <p>Reduce the jobs target and proposed employment floorspace level to reflect new technical evidence. One of the roles of the proposed joint Area Action Plan is to address cross boundary issues and synergies in a coherent way.</p> <p>Reduce office floorspace targets to reflect new technical evidence. Small businesses are encouraged in Section 13 and Policy CS15 and their existing role in the economy recognised.</p> <p>Reduce the jobs and employment floorspace</p>		

<p>reflect the allocated floorspace in Policy CS15 to ensure that policy aspirations are aligned with predicted growth and can be monitored. The EEFM Autumn forecast suggests a total jobs growth figure for the borough for 2008-2026 of around 10,000 jobs.</p> <p>Friends of the Earth broadly support the approach but urge protection for the Green Belt from employment uses.</p> <p>CPRE Hertfordshire support the approach, but make the suggestion that given the large amount of unoccupied office floorspace in Hemel Hempstead, new office floorspace should be restricted unless or until a positive demand can be demonstrated.</p> <p>The Hertfordshire Chamber of Commerce & Industry are concerned that the office floorspace target is unrealistically high. They suggest that a survey is regularly undertaken of:</p> <ul style="list-style-type: none"> • empty property units • current office users' needs and future plans <p>and that the results are considered in the context of long-term economic forecasts/trends.</p> <p>They also suggest that the Core Strategy allows for employment development in the Green Belt.</p> <p>Bovingdon Parish Council, Tring Town Council, Hertsmere Borough Council and the British Standards institute support the approach.</p> <p>Comments from individuals:</p> <p><i>Individuals who disagreed made the following comments:</i></p> <p>Small business and starter units should be encouraged.</p>	<p>targets to reflect new technical evidence. These targets broadly reflect the latest EEFM forecasts.</p> <p>Comment noted, no action required. The Core Strategy does not propose any loss of Green Belt solely for employment uses. Furthermore, the Green Belt is generally protected under Policy CS5.</p> <p>Comment noted, no action required. This factor has been taken into account in the updated technical work and used to inform the new floorspace targets.</p> <p>Reduce office floorspace targets to reflect new technical evidence. A record is kept of trends in vacant properties. The Council's Economic Development Officer liaises with local businesses to establish users' needs and plans. The Council do not consider that a release from the Green Belt is required to meet employment needs (though small scale releases, for example ancillary to housing in a local allocation, may be justified).</p> <p>Support welcomed.</p> <p>Comment noted, no action required. Small businesses are</p>
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<p>The Core Strategy should encourage workshops and manufacturing.</p>	<p>encouraged in chapter 13 and Policy CS15. The Council has recently opened the Maylands Business Centre to help meet those needs.</p>
<p>Concentrating more employment floorspace at Maylands will exacerbate existing congestion problems.</p>	<p>Comment noted, no action required. The amount of floorspace cited in policy CS15 for industry, storage and distribution is based on evidence of anticipated demand.</p>
<p>GEAs should be spread throughout Hemel Hempstead in smaller units than at Maylands to disperse traffic.</p>	<p>Comment noted, no action required. The Maylands Sustainable Transport Study will consider solutions to congestion problems. This will also be addressed as part of the Area Action Plan work.</p>
<p>GEAs should be spread throughout Hemel Hempstead in smaller units than at Maylands to disperse traffic.</p>	<p>Comment noted, no action required. The Core Strategy aims to ensure that an appropriate spread of employment land is retained in the Borough.</p>
<p>Maylands is not supported as the main employment location due to the proximity of Buncefield.</p>	<p>Comment noted, no action required. The Health and Safety Executive's advice regarding Buncefield has been followed by the Council.</p>
<p><i>Individuals who agreed made the following comments:</i></p>	
<p>Support for the strategy as long as the proposed growth takes place within existing settlements and not within the Green Belt.</p>	<p>See response to Friends of the Earth.</p>
<p>Smaller employment units are needed in the villages, and small business parks should be spread across the borough to help with traffic congestion.</p>	<p>Comment noted, no action required. Village employment is supported by Policies CS1 and CS14, and by the place strategies.</p>
<p>Adequate parking must be provided at employment locations to avoid inconvenience for nearby residents and companies.</p>	<p>Comment noted. Policy 58 of the Local Plan sets out the general approach to car parking provision. Existing parking standards</p>

<p>The change from manufacturing to a warehouse based economy means lower paid jobs which people in the borough cannot afford to take due to the lack of affordable housing. This is a real dilemma which must be addressed.</p> <p><i>Other comments from individuals:</i></p> <p>Offices are unobtrusive uses and should not be confined to general employment areas – they should be allowed in residential areas as well.</p> <p>The office floorspace target seems unrealistically high.</p> <p>Comments from landowners:</p> <p><i>Landowners who disagreed made the following comments:</i></p> <p>The Crown Estate and Gleeson Strategic Land query the source and justification of the floorspace figures in Policy CS15.</p> <p>National Grid, Property & Gas query the justification for protecting all General Employment Areas (GEAs) for B-Class uses. The policy should allow flexibility for redevelopment of GEAs.</p>	<p>will be reviewed through the Development Management DPD and/or supplementary guidance in light of new evidence.</p> <p>Comment noted. Whilst wage rates are not a Core Strategy issue, Policy CS15 seeks to ensure an appropriate mix of employment uses. The approach to affordable housing is set out in Policy CS19</p> <p>Policy CS4 sets out the range of uses considered appropriate in residential areas. This includes development for business purposes provided this is compatible with its surroundings.</p> <p>Reduce office floorspace targets to reflect new technical evidence.</p> <p>Reduce employment floorspace targets to reflect new technical evidence. This technical evidence sets out the basis for the figures.</p> <p>Comment noted, no action required. The policy is based on appropriate technical evidence in the South West Hertfordshire Employment Land Update (2010) (Appendix 2). The Site Allocations DPD will set out any GEAs proposed for redevelopment for non-</p>
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<p>Aviva Investors suggest that Policy CS15 should be broadened to allow land uses that meet the needs of businesses in Maylands Business Park, that do not fall within the B-class use class. This would include uses such as hotels.</p> <p>National Grid, Property & Gas suggest that the Core Strategy should set out the circumstances under which redevelopment of GEAs for non-employment uses will be allowed. These should include how well located the GEA is, and whether compensatory employment space will be provided elsewhere. The Core Strategy should also state that where there are site specific circumstances which mean that the Employment uses have an adverse impact on surrounding uses this will also be a consideration.</p> <p>National Grid, Property & Gas state that there are site specific circumstances that mean the part of the National Grid Site within the Two Waters GEA would be better suited for residential than employment uses. See full response for details.</p> <p>Winreb Finance suggest that the Core Strategy should include a focus on key locations for new office developments to ensure that new office developments match market needs and do not simply add to the borough-wide surfeit of office floorspace. Marginal locations should be redesignated for housing.</p> <p><i>Landowners who agreed made the following comments:</i></p>	<p>employment uses.</p> <p>Para 13.3 already acknowledges that some non-B class uses may be appropriate in GEAs. Those uses will however be assessed on a site by site basis. Amend text to include reference to hotels as an example.</p> <p>Comment noted, no action required. The approach to protecting GEAs for employment uses is supported by technical evidence (the South West Hertfordshire Employment Land Update (2010) and subsequent 2011 update). GEAs which are considered suitable for mixed use development will be allocated in the Site Allocations DPD. Any site specific requirements will be highlighted here.</p> <p>Comment noted, no action required. Technical evidence supports the Core Strategy position that existing GEAs are protected for employment uses. Any reallocation of land will be considered in the Site Allocations DPD. Part of the National grid site at Two Waters is subject to a housing proposal in the current Local Plan.</p> <p>Comment noted, no action required. This is already reflected in the text at para 13.10 and in Policy CS15. Any GEA that is no longer suitable for employment uses will be considered for redesignation through the Site Allocations DPD process.</p>
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<p>USS suggest that Policy CS15 should be broadened to allow land uses that meet the needs of businesses in Maylands Business Park, that do not fall within the B-class use class. This would include uses such as hotels.</p> <p>Zog Brownfield Ventures Ltd suggest that Policy CS15 should support the redevelopment of office sites (even where a net loss of office floorspace is involved) where it can be demonstrated that the proposed development would help support local businesses and provide new local employment opportunities.</p> <p>ING Real Estate argue that given that the Heart of Maylands has been identified as a suitable area for a mix of uses, the Council should adopt a balanced approach to the provision of office space to ensure that appropriate, feasible schemes can come forward which assist in the regeneration of an area.</p> <p><i>Other comments from landowners:</i></p> <p>Akzo Noble Pension Scheme query the justification for protecting all General Employment Areas (GEAs) for B-Class uses. The policy should allow flexibility for redevelopment of GEAs.</p> <p>Akzo Nobel Pension Scheme request that Policy CS15 acknowledges that some General Employment Areas will be redeveloped for alternative uses in the emerging Site Allocations DPD.</p> <p>Akzo Noble Pension Scheme point out that the South West Hertfordshire Employment Land Update (June 2010) states that industrial/warehouse sites should be safeguarded unless they are no longer attractive or suitable, in which case they should be replaced. It specifically states that the Frogmore site should be released for alternative development. This conflicts with para 13.13 of the draft Core Strategy which anticipates a small rise in the amount of industrial/warehouse floorspace required, and</p>	<p>See response to Aviva Investors above.</p> <p>Comment noted, no action required. If an application is contrary to policy in the Core Strategy, the applicant may present special circumstances as to how the benefits outweigh the harm caused to the employment land supply position.</p> <p>The Core Strategy is considered to set out a clear approach on the role of office development in meeting regeneration objectives. The office floorspace target has been reduced in light of new technical evidence.</p> <p>See response to National Grid above.</p> <p>Comment noted. No action required as the general policy approach, supported by technical evidence, is to retain GEAs in employment use. The Site Allocations DPD process could lead to the redesignation of a GEA(s).</p> <p>No further action required. See response above. Floorspace targets have been reduced in light of new technical evidence.</p>
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justification is sought for this requirement. Grand Union Investments: No comment	No action required.
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Supporting Retailing and commerce

QUESTION 8

Do you support the approach to 'Supporting Retail and Commerce' set out in Section 14?

Responses received 36

Yes - Key organisations 5
 Individuals 14
 Landowners 2
Total 21 responses

No clear answer:
 Key organisations 0
 Individuals 1
 Landowners 1
Total 2

No - Key organisations 5
 Individuals 5
 Landowners 3
Total 13 responses

Response

Actions

Organisations:

Comments from organisations that disagreed:

Chipperfield Parish Council request that the policy supports shops in small villages as currently provided by Local Plan Policy 45.

Comment noted, no action required. Policy 45 of the Local Plan will be retained until it is reviewed in a later DPD.

Nettleden with Potten End Parish Council oppose 'shed' retailing and request that the shops in town centres are improved.

Comment noted, no action required. One of the roles of Hemel Hempstead Town Centre Master Plan will be to consider how town centre services and facilities can be improved.

St Albans City & District Council do not support the approach. They are concerned that the amount of new retail floorspace identified in policy CS16 for Hemel Hempstead may have a negative impact on St Albans City Centre and Harpenden Town Centre. They request an impact assessment of the proposed growth on the centres in St Albans District.

Comment noted. The retail figures have been reassessed. New estimates suggest a small additional increase in proposed floorspace. The reassessment did not assume any increase in the market share of Hemel Hempstead over places in any other district. Retail capacity reasonably

<p>Friends of the Earth support the diversity of shops in the local neighbourhood centres. They support the shops in Hemel Hempstead town centre and are therefore opposed to out of centre retail developments. They do not support any development that would substantially increase traffic.</p> <p>The New Conservation Society suggests that pedestrian access is prioritised at local shopping centres and that car parking should be constrained.</p> <p><i>Comments from organisations that agreed:</i></p> <p>Tring Town Council, Bovingdon Parish Council, Friends of the Earth and the Hertfordshire Chamber of Commerce support the approach</p> <p>Markyate Parish Council support the approach, but suggest that the policies should offer stronger support to existing shops. They go on to suggest that lower business rates would be helpful and would increase the viability of small local shops, which often have accommodation above them.</p> <p>Individuals:</p> <p><i>Comments from individuals who disagreed:</i></p> <p>In Berkhamsted, there is enough vacant/under-used retail floorspace to meet the identified capacities.</p> <p>New retail developments should be within existing settlements and not in the Green Belt.</p> <p>New retail developments should have public transport provision.</p> <p>Maylands should not have a local centre due to its proximity to Buncefield.</p>	<p>relates to the role of Hemel Hempstead town centre in the retail hierarchy in the East of England Plan. A separate impact study relating to St Albans is not justified.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. These issues are covered in Chapter 10 and Policy CS8.</p> <p>Support welcomed.</p> <p>Support welcomed. Existing shops are supported through the sequential approach and impact assessment. The setting of business rates is not a Core Strategy issue.</p> <p>Comment noted, no action required. The retail capacity study has taken account of vacant retail floorspace.</p> <p>Comment noted, no action required. The Core Strategy does not propose any large scale retail floorspace in the Green Belt.</p> <p>Comment noted, no action required. See Chapter 10 and Policy CS8.</p> <p>The provision of local facilities for the Maylands business area is supported</p>
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<p>There should be local shops in walking distance of all dwellings. Large supermarkets and DIY stores should be within walking distance of public transport, and be designed to be underground.</p> <p><i>Comments from individuals who agreed:</i></p> <p>No more 'shed' developments.</p> <p>Strengthen controls over loss of retail floorspace in town centres.</p> <p>Do more to make Hemel Hempstead town centre more attractive.</p> <p>Discourage/prevent large retailers moving into retail units in the neighbourhood shopping centres.</p> <p>Existing retailers should be consulted before permission is granted for new retail floorspace.</p> <p>New public facilities should be provided to replace the Pavillion as the town needs a space for performing arts.</p> <p><i>Other comments from individuals:</i></p> <p>There should be an indication of what retail should be included in any new neighbourhoods.</p>	<p>by local businesses. It will help support regeneration objectives. The Heart of Maylands is not adjacent to Buncefield.</p> <p>Comment noted, no action required. The approach to accessibility is set out in Policy CS8 and Chapter 10.</p> <p>Comment noted, no action required. See existing para 14.6.</p> <p>Comment noted, no action required. Policy 42 of the Local Plan protects shopping areas in town centres, and is retained as a saved policy.</p> <p>The framework for the town set out in the Hemel Hempstead Place Strategy is intended to achieve this, in conjunction with the new Town Centre Master Plan.</p> <p>Comment noted, no action required. The planning system cannot control the precise occupancy of retail units.</p> <p>See above.</p> <p>See responses to Hemel Hempstead Place Strategy.</p> <p>Comment noted, no action required. The size and location of the neighbourhood and availability of alternative facilities will be relevant factors guiding any new provision. Further guidance will be provided where appropriate in the</p>
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<p>Landowners:</p> <p><i>Comments from landowners who disagreed:</i></p> <p>Akaria Investments Ltd and Standard Life Investments Ltd support the redesignation of Jarman Field as an out-of-centre retail and leisure location.</p> <p>Akaria Investments Ltd and Standard Life Investments Ltd question the robustness of the retail floorspace figures identified in Policy CS16. It is suggested that a comprehensive review of the retail capacity projection figures should be undertaken.</p> <p>SEGRO state that there should be a reference to trade counters, either within the commercial or retail section. The Core Strategy should include a policy on Trade Counters to clarify that they are an acceptable ancillary use for units in Use Classes B2 and B8 in Maylands Business Park.</p> <p><i>Comments from landowners who agreed:</i></p> <p>ING Real Estate support the approach.</p> <p>Zog Brownfield Ventures Ltd request that the Hicks Road Strategic Site in Markyate is be referred to as capable of providing small scale retail uses (Classes A1-A4).</p> <p><i>Other comments from landowners:</i></p> <p>Sainsburys request that Woodhall Farm be redesignated from a Local Centre with a District Centre Function to a District Centre.</p>	<p>Site Allocations DPD.</p> <p>Support welcomed..</p> <p>Retail capacity figures for the borough have been reassessed and revised in the light of the new technical evidence.</p> <p>Comment noted. This is too detailed an issue for the Core Strategy. Trade counters can be assessed on a site by site basis and in the context of the Area Action Plan if necessary.</p> <p>Support welcomed.</p> <p>Comment noted, no action required. See Proposal and Principles for Hicks Road Strategic Site in Section 26.</p> <p>Comment noted, no action required. The centre at Woodhall Farm falls between the PPS4 definitions of District and Local Centre. The current designation remains appropriate.</p>
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Providing Homes and Community Services

QUESTION 9

Which annual housing target stated in Policy CS17 do you support?	
<p>Responses received 116</p> <p>Option 1</p> <p>Yes - Key organisations 15 (inc. 4 duplicates) Individuals 23 Landowners 1 Total 39 responses</p> <p>Option 2</p> <p>Yes - Key organisations 4 Individuals 13 Landowners 6 Total 23 responses</p>	<p>Neither - Key organisations 4 (inc. 1 duplicate) Individuals 36 Landowners 11 Total 51 responses</p> <p>No clear answer:</p> <p> Key organisations 1 Individuals 0 Landowners 2 Total 3</p>
Response	Actions
<p>Comments from key organisations:</p> <p><i>Those organisations who gave no clear answer made the following comments:</i></p> <p>Markyate Parish Council supports an additional 190 homes in their village together with housing option 1.</p>	<p>The Council decided to select Housing Option 2 with a housing target of 430 dwellings p.a. Chapter 4 (in Volume 6) considers the growth issue and explains the main factors the Council took into account in reaching its decision. Paras 4.10 - 4.13 are particularly relevant.</p> <p>There are related responses to housing matters under Question 10 as well.</p> <p>Specific responses to commenters follow.</p> <p>Support acknowledged. The Option 1 and 2 figures in the</p>

<p><i>Those organisations who supported neither housing options made the following comments:</i></p> <p>New Conservation Society:</p> <p>A target of at or below 300 dwellings per year is preferred, but two other scenarios suggested (500 and 620 dwellings per annum). The housing demand figures in the SHMA are unsound.</p>	<p>Consultation Draft were the same for Markyate.</p> <p>Comments noted, no action required. The lower level would be significantly below the yardstick 2008 ONS household projection, historic completions rates (360 houses pa), and the amount that could reasonably be accommodated within the urban area. The higher stated figure would have major implications for the character of settlements, would require Green Belt releases and would significantly impact on local infrastructure.</p>
<p>The Homes Builders Federation object to the two options on several grounds:</p> <ul style="list-style-type: none"> • The Core Strategy is insufficient to address future housing needs and it is unrealistic to assume a nil net migration. • Planning for lower levels than the RSS and household projections of housing delivery will not support economic recovery. <ul style="list-style-type: none"> • A backlog of 2,690 dwellings should be accounted for. • The 2008 household projections indicate an increase of 12,000 to which needs to be added an allowance for the backlog, second homes and vacancies. 	<p>Comments noted throughout, but no action required.</p> <p>The Council has taken a balanced approach to a range of factors, including migration and economic recovery, in setting the housing target.</p> <p>The housing target selected does not simply reflect household or dwelling projections. It takes into account other factors and represents a measured response by the Council. Factors such as second homes and vacancies are</p>

<ul style="list-style-type: none"> • This would suggest the need for 15,281 homes from 2011-2031. • The housing supply should not include any contribution from gypsy and traveller pitches as they are not conventional housing. • A strictly urban capacity approach is unlikely to be successful. • Windfalls are not justified as they comprise a significant element of the total supply. • The remedial action figure of 15% in Policy CS17 is too low and a higher trigger of either 50 or 60% should be used. This approach should also involve a 	<p>understood and acknowledged. In fact second homes and vacancies are not significant, comprising a very small proportion of the overall housing stock and supply.</p> <p>The Council is dealing with traveller accommodation as part of addressing the housing needs of the whole community, rather than as a completely separate requirement. This approach reflects Government and strategic policy. The number of pitches represents a tiny proportion of overall supply (c. 0.5%).</p> <p>Comments noted, no action required. PPS3 states that authorities can reasonably account for windfalls from years 11 onwards of the housing supply. Historically, windfalls have been an important part of housing land supply (see Housing Land Availability Paper (July 2011)). There is no reason why windfalls should not continue to come forward, and should therefore form part of future contributions. See response to similar comment under Question 10.</p> <p>The SHLAA has already</p>
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<p>review of Core Strategy policies to identify those that are obstacles to building.</p> <ul style="list-style-type: none"> • The SHLAA sites should be reviewed. <p>Stevenage Borough Council:</p> <p>Objects to both housing options. Only three different housing options have been considered. A natural growth option is considered in the Sustainability Appraisal (SA) and significant benefits identified, but it is unclear why this option has been rejected. Any under provision will require a redistribution of development to other authorities to make up the shortfall. It does recognise that in the past a balance has been struck between development constraints and housing needs allowing districts to effectively under provide. The Core Strategy provides no mechanism to ensure that other authorities deliver sufficient housing to meet future needs and this is unlikely to happen. It is unlikely that the SA would be legally compliant or consistent with national policy. Following the outcome of their examination into their Core Strategy, they may want to see the housing target amended or increased to reflect any reduction in housing provision in Stevenage. Their position will be kept under review.</p> <p>Berkhamsted Town Council:</p> <p>Does not support either option as far as it affects the town. In their previous response to the Emerging Core Strategy they stated that only 750 dwellings should be planned for. This lower figure would not need any Green Belt release or require the increase to 200 dwellings on the Durrants Lane/ Shootersway allocation.</p> <p><i>Those organisations who supported housing option 1 made</i></p>	<p>been subject to a two stage review process (see Housing Land Availability Paper (July 2011)). The sites are also regularly monitored through the Annual Monitoring Report.</p> <p>Comments noted, no action required. With the intended demise of the East of England Plan to support a more comprehensive approach to delivery across districts, it is difficult for authorities to coordinate housing levels at a sub regional level. Furthermore, Government is encouraging authorities to set their own targets taking into account local circumstances. In the absence of a proper mechanism in place to address shortfalls, the Council feels it has set a reasonable level of housing, taking account of projected needs, economic growth and environmental implications.</p> <p>Comments noted, no action required. See related responses to Questions 18-22.</p> <p>Comments noted, no</p>
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<p><i>the following comments:</i></p> <p>CPRE considers that the strategy should be based on the principle of restricting development outside existing settlement boundaries.</p> <p>Berkhamsted Town Council (Cllr Stevens):</p> <p>Supports the option subject to providing a minimum of 3,100 affordable homes over the plan period. Option 2 would lead to a number of allocations located immediately adjacent to the Chilterns AONB. If the approach is taken forward then great care will be needed when planning for these sites.</p> <p>Friends of the Earth:</p> <p>Hertfordshire has already provided enough homes. All new homes should be sustainable and built using renewable technology. The impact of new homes on future water supplies and waste needs to be considered.</p> <p>Hertfordshire Chamber of Commerce & Industry:</p> <p>To encourage new jobs it is vital to deliver affordable homes close to places of work. Town centre living seems a good solution.</p> <p>Nettleden and Potten End Parish Council:</p> <p>The future lies in entrepreneurs working from home/office. Parish Councils should relax their planning restrictions to allow opportunities for small-scale housing development. They are concerned over expansion of the Fields End estate and the adverse impact it would have on residents in Potten End and in general e.g. roads, schooling and</p>	<p>action required.</p> <p>Comments noted, no action required.</p> <p>Comments noted, no action required. See related response under Question 10.</p> <p>Comments noted, no action required. The Core Strategy seeks to encourage new development that is well connected and accessible to services and facilities. It is also encouraging development in town centres as sustainable locations, particularly in Hemel Hempstead.</p> <p>Comments noted, no action required. Opportunities are likely to be limited within small settlements, especially if harm to the character of such villages is to be avoided. A small scale rural exception site could provide a better</p>
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<p>capacity of utilities. Rural exception sites promoted under Policy CS20 should be in and not adjoining villages.</p> <p>Tring Rural Parish Council:</p> <p>Green Belt and the Rural Area should be protected. New development should be kept to current boundaries unless there is an overriding need or wish expressed from the local community.</p> <p>Tring Town Council considers that option 1 would meet needs, protect the Green Belt and avoid development of the Icknield Way site.</p> <p>Chilterns Conservation Board:</p> <ul style="list-style-type: none"> • The Option 2 approach would lead to a number of housing allocations that would be immediately adjacent to the Chilterns AONB. • Should the Council proceed with the Option 2 housing programme then great care will be needed with the approach that is taken in connection with all of the allocations that are near or immediately adjacent to the boundary of the Chilterns AONB (West Hemel Hempstead, Icknield Way west of Tring and New Road Berkhamsted). <p><i>The following organisations supported option1 but gave no reasons:</i></p> <ul style="list-style-type: none"> • British Standards Institute; • Chipperfield Parish Council; • Piccotts End Residents Association • Tring Sports forum <p><i>Those organisations who supported housing option 2 gave the following reasons:</i></p>	<p>opportunity for new affordable homes. See response to Question 16 in relation to the impact of West Hemel Hempstead as a housing location.</p> <p>Comments noted, no action required.</p> <p>Comments noted, no action required.</p> <p>Comments noted, no action required. The principle of being sensitive to the layout, design and thus impact of the development next to the AONB is acknowledged.</p> <p>Support welcomed.</p> <p>Comments noted, no</p>
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<p>Little Gaddesden Parish Council:</p> <ul style="list-style-type: none"> • Supports the option as a basis of a greater supply of affordable housing in the Borough. • They request the adoption of the Parish Plan as the basis of evidence that the local community have been properly consulted on housing development priorities and that the creation of affordable housing with priority to local connections received more support than any other housing option consulted upon. 	<p>action required. Parish Plans can help identify the level and type of local housing need. This can help supplement future planned work on a borough-wide housing needs study. Existing policy would support an approach that gives priority to local connections. Parish Councils are asked to discuss any future intended parish plans incorporating planning issues with the Council's Strategic Planning Group.</p>
<p>Bovingdon Parish Council:</p> <ul style="list-style-type: none"> • Supports Option 2 subject to a number of contingencies, one of which being that site LA7 remains the designated local allocation site in Bovingdon (see the Parish Council's response to question 26 for further details). I • for any reason, the local allocation site at Bovingdon were to change the Parish Council would revert to its former position and support Option 1. 	<p>Comments noted, no action required. LA7 is the preferred allocation in the published Assessment of Strategic Sites and Local Allocations.</p>
<p>Winreb Finance :</p> <ul style="list-style-type: none"> • The proposed level of provision within Option 2 is still below the East of England Regional Plan. • Option 1 target is not sufficiently robust having regard to in-migration and the aging population, and would not properly address the emerging issue of affordability of housing. • There should not be a reliance on greenfield or Green Belt land in order to achieve the targets. • Selected employment sites should be re-designated within the built-up areas of the main settlements to housing such as site B, Apsley Mills. This will increase robustness around achieving the housing targets. It is also consistent with the approach 	<p>Comments noted, no action required. The suggested site can be considered in the light of technical work on employment land supply and jobs growth. The East of England Plan does not include a housing target for Dacorum.</p>

advocated in the Pidea report on long term employment land needs and is considered important having regard to assumptions being made around windfall sites and housing development in the town centre and elsewhere in Hemel Hempstead.

The following organisation supported option 2 but gave no reasons:

- Sainsbury's

Comments from individuals:

People who disagreed with both housing options gave the following reasons:

There is no need for an annual housing target. The priority should be to upgrade and maintain existing properties. Hemel Hempstead and Berkhamsted are overcrowded and any growth would be unsustainable, especially as the local hospital will eventually close. No new homes should be built. Derelict housing should be made useable.

Both housing options are too large. Existing services and infrastructure need to be improved and expanded and existing properties upgraded and maintained before increasing capacity. Affordable housing should be designed

Support welcomed.

Comments noted, no action required. As a minimum, new housing is needed even if the population remained static in number (due to a range of demographic changes). It must be planned for and a housing target given. The evidence base suggests that Hemel Hempstead and Berkhamsted can accommodate additional housing in a sustainable manner (see Sustainability Appraisal to Core Strategy). The range of services provided by the hospital is a matter for the relevant health authorities. This factor by itself does not imply that future housing should not be provided in the borough.

Comments noted, no action required. The Council considers that the housing target set is reasonable given local circumstances. While there are infrastructure

<p>to a higher standard. The infrastructure to meet the demands of growth must be planned for. Infrastructure must match the increase in housing and areas are not overdeveloped.</p> <p>The target should be limited to what can be achieved on existing brownfield sites.</p> <p>New housing will lead to the loss of the local countryside and the area will lose its character and beauty. There should not be development on greenfield and Green Belt land.</p> <p>The housing supply figures are unsound and should be reviewed. The windfall contribution is incorrect, contradicts advice in PPS3, and should be discounted. There are insufficient sites identified to make up the shortfall. Part of the resulting shortfall could be made up by allocating land at Blegberry Gardens, Shootersway, Berkhamsted as a housing allocation (capacity 123 units).</p> <p>There is insufficient employment to sustain the new housing. It is vital to protect farmland and the Green Belt.</p>	<p>needs to be accommodated, there is no indication from any of the key providers that infrastructure needs cannot be planned for. The Core Strategy seeks new development to be brought forward together with associated infrastructure. However, this must be proportionate to the scale of its impact and it cannot make up for all shortfalls in existing infrastructure. Comments noted, no action required.</p> <p>Comments noted, no action required.</p> <p>Comments noted, no action. See related response to windfalls in Question 10. Sufficient sites have already been identified in Berkhamsted to satisfy a reasonable level of growth of and to meet the local housing needs in the town.</p> <p>Comments noted, no action required. The Core Strategy has carefully related housing to jobs growth through detailed technical employment studies. The principle of protecting the countryside from built development is acknowledged. The Council is seeking to keep impacts on the</p>
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<p>Both targets are too high for existing infrastructure. Building on greenfield land is unsustainable. The correct approach is to build on available brownfield land. Berkhamsted should expand on the basis of demonstrable need not projections, creating employment in tandem with housing.</p> <p>In the case of Berkhamsted, Berkhamsted Town Council have previously argued for only 750 dwellings over the plan period which would not need any Green Belt releases nor the increase in capacity of the Durrants Lane / Shootersway site from 100 to 200 homes.</p> <p>There should be no growth as the South East is already overcrowded. Development should be targeted to other parts of the country.</p> <p>Option 1 should be set at 300 homes and option 2 should be 360 homes. The originally suggested options are too ambitious and expensive and a more cautious approach is required.</p> <p>Both options are too high and will change the character of the area. The infrastructure cannot cope and is unlikely to keep pace with the growth.</p> <p>Support the views of Berkhamsted Town Council that a lower level of houses in the town would maintain its character and safeguard green spaces. The Council should not support development on the ridgetop area around Durrants Lane / Shootersway.</p> <p>Only 750 dwellings should be built in Berkhamsted. This would not require any Green Belt releases or development</p>	<p>open countryside to a minimum.</p> <p>Comments noted, no action required. See responses above to brownfield land, Berkhamsted and employment growth.</p> <p>Comments noted, no action required. See above response to related comments.</p> <p>Comments noted, no action required. There is no overwhelming evidence that the region should not accommodate additional growth. Each authority will indeed have to consider its own locally generated demand and what then is a reasonable level of housing to provide. Local circumstances, including location within the Metropolitan Green Belt, will also be relevant considerations.</p> <p>Comments noted, no action required. See earlier responses to the housing target and infrastructure.</p> <p>Comments noted, no action required. See related responses to Questions 18-22.</p>
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<p>of the Shootersway / Durrants Lane site. Berkhamsted is the most densely populated town in Hertfordshire and cannot support new homes of this scale.</p> <p>No additional homes should be built. More people do not mean extra homes. Dacorum cannot grow in area (unless it spreads into St Albans district), it will mean the loss of green fields and have many negative consequences.</p> <p>Both options are too high and will result in over-crowding and the destruction of the rural character of the borough. Any target should be limited to what can be achieved from brownfield sites within settlements. There should be no incursion into the countryside or the Green Belt. The borough's rural character and Green Belt should be safeguarded.</p> <p>The target should be 9,100 homes over the 25 year period. Some local allocations under option 2 to be included, but no further development within Apsley, Nash Mills, and the Green Belt.</p> <p>The target should only be 70, but not on Green Belt land. If you satisfy the demand for new housing you will destroy the Green Belt and countryside. The demand does not necessarily reflect the need or want of local people. The infrastructure will not be able to support and keep pace with such growth and will lower the quality of people's lives.</p> <p>Only small brownfield sites should be developed. Both options are too large for the existing services and infrastructure. The top priority should be protection of the Green belt and greenfield sites.</p> <p>There should not be a specific target as it will tend to be self fulfilling and would be treated as a minimum. The overall numbers would increase the incursion into the Green Belt and lead to a growing proportion of open land lost.</p> <p>The target should be around 300 new homes. The figure for the estimated jobs growth is over-optimistic. Objects to the concept of local allocations, particularly that at Marchmont Farm and its planning requirements. The allocation runs</p>	<p>Comments noted, no action required. See earlier comments on the housing target.</p> <p>Comments noted, no action required. See above responses on the housing target, Green Belt and brownfield sites.</p> <p>Comments noted, no action required. See above responses on the housing target.</p> <p>Comments noted, no action required. See above responses on the housing target and infrastructure.</p> <p>Comments noted, no action required. See above response on the housing target, Green Belt and brownfield sites.</p> <p>Comments noted, no action required. See above response on the need to meet housing growth and the Green Belt.</p> <p>Comments noted, no action required. See above response on the housing target, and jobs growth. See also responses to Marchmont</p>
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<p>contrary to the purposes of the Green Belt.</p> <p>There are far too many homes being planned for, especially as many lay vacant. This suggests there is a minimum need for new houses.</p> <p>200 new homes per year should be planned for with a review as to their suitability.</p> <p>Neither option is desirable, although Option 1 is preferred as it does not involve the loss of Green Belt land.</p> <p>The options are based on random figures rather than on sustainable development principles. The plan is to build more homes in a county and district that already have high population densities.</p> <p>The options will not meet the needs of the population. In the case of Berkhamsted, local services and infrastructure are at capacity and cannot accommodate either option.</p> <p>The existing Council housing register should be tackled first as a priority, which could involve a short term increase in house building for at least 5 years. This should be followed by a review of numbers that could involve a much lower rate in the future.</p>	<p>Farm under Question 16.</p> <p>Comments noted, no action required. See above response on the housing target, and the need to plan for future homes.</p> <p>Comments noted, no action required. See above response on the housing target.</p> <p>Comments noted, no action required. See above response on the housing target, Green Belt and brownfield sites.</p> <p>Comments noted, no action required. Sustainable development principles have underpinned decisions on the scale and location of future development. See above response on the ability of the borough to accommodate future growth.</p> <p>Comments noted, no action required. The housing target takes a balanced approach to meeting the local needs of the population. See above response on Berkhamsted.</p> <p>Comments noted, no action required. Providing for new development will help address housing need, and the housing programme does predict increased housing supply over the next 5 years (see Housing Land</p>
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<p><i>People who agreed with Housing Option 1 gave the following reasons:</i></p> <p>Oppose urban sprawl and building on greenfield sites.</p> <p>Both options will add to levels of congestion, but the lower option is preferred. The West Hemel Hempstead local allocation runs contrary to convenient home-work travel and reducing car use.</p> <p>Hemel Hempstead cannot continue to expand as local services, facilities and infrastructure cannot cope. Object to any building at Marchmont Farm.</p> <p>There is a need to restrict development on Green Belt land.</p> <p>The growth should be for the existing population.</p> <p>Less new homes means less building on greenfield sites.</p> <p>The hospital facilities are being reduced at a time when more houses are being proposed.</p> <p>While the difference between the two options is small, the impact on greenfield sites is huge. Greenfield development should be resisted as the region is over-developed. Existing residents should be encouraged to move to less developed</p>	<p>Availability Paper (July 2011)). However, it is important that the Core Strategy plans for a steady supply of housing over the plan period.</p> <p>Comments noted throughout to options 1 and 2, no action required. Unless stated, see related responses above on the housing target (and need for growth), Green Belt, infrastructure, Hemel Hempstead, brownfield sites, the hospital, and overdevelopment.</p> <p>All new development will need to be well located and accessible to facilities and for its users, and meet its demand on the local road system (Policies CS8 and 9).</p> <p>See related response to Marchmont Farm under Question 16.</p>
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<p>areas.</p> <p>It is not possible to meet all of the demand for housing in the region. Option 1 is a reasonable compromise to safeguard the local environment.</p> <p>The difference between the two options is based on development of the Green Belt. This would be undesirable and add little to the borough's housing stock.</p> <p>The redeeming feature of Hemel Hempstead is its open spaces and the conservation of the Green Belt.</p> <p><i>People who agreed with housing option 2 gave the following reasons:</i></p> <p>The borough needs more housing and especially more affordable housing to boost the local economy and maintain a sustainable, balanced community.</p> <p>Option 2 is supported as it relates to Hemel Hempstead, albeit with the local housing allocations phased to bring forward West Hemel Hempstead (in its entirety for 900 dwellings) first and in a timely manner that allows a consistent contribution to the projected rate of housing completions.</p> <p>This option is still 1,000 homes short of 12,400 for natural growth. Land to East of Hemel in St Albans District has good sites and should be looked at vigorously for development (as per East of England Plan).</p> <p>The option allows additional homes to be built on an 'in-fill' basis within the existing large villages therefore ensuring that large areas of open space i.e. Green Belt are not necessarily developed which would require greater infrastructure investment.</p> <p>There are a lot of people waiting for decent homes to live in, whether affordable or market priced. Dacorum should play its part in this. The new housing should be built where possible where people prefer to live. Supports modest incursions into the Green Belt.</p> <p>There has to be a balance between no development and the need to accommodate a growing population whether by</p>	<p>The development strategy for the town seeks to safeguard open spaces from development.</p> <p>The housing target seeks to achieve this in a balanced approach to housing growth.</p> <p>Support welcomed.</p> <p>Cross boundary issues with St Albans District Council are being tackled through the East Hemel Hempstead Area Action Plan.</p> <p>The Core Strategy is seeking to optimise opportunities for affordable housing.</p>
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<p>natural growth or by migration. Supports the lower target levels for the Borough and thus Berkhamsted, although they will still have a marked impact on the town's infrastructure if the latter is not upgraded. Notes that some of the proposed target has already been built and no immediate development proposed along the A41 corridor.</p> <p>The Core Strategy should provide housing for all parts of the community. It does not satisfy the objective of "meeting the needs of the population". Option 1 would not satisfy local need and would compromise the delivery of affordable homes.</p> <p>There are not enough homes in Dacorum, and priority should be given to local people.</p> <p>Comments from landowners:</p> <p>The following landowners gave no clear answer:</p> <p>ING Real Estate did not make clear their views on the housing options.</p> <p>Akzo Nobel Pension Scheme:</p> <ul style="list-style-type: none"> • The choice of housing target will be based on sustainable and economic objectives and not a credible evidence base. • The evidence base is not sufficiently robust or up to date to justify the housing target based on current demand, need and supply e.g. the SHMA. • They are not clear on the definition of and reasoning behind strategic and local allocations. 	<p>The Core Strategy is seeking to meet the housing needs of the community, but there is also a need to work with other relevant agencies, such as the County Council and housing providers.</p> <p>New homes are primarily geared to meeting the natural growth of the existing population, but there will always be a natural movement of people into and out of the borough. It would generally be unreasonable and impractical to restrict occupancy except in the case of affordable homes.</p> <p>Comments noted, no action required.</p> <p>The housing target takes on a balanced approach to all these factors. Technical evidence about strategic sites and local allocations is given in the published Assessment of Strategic Sites and Local Allocations. The</p>
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<p><i>Landowners who disagreed with both housing options gave the following reasons:</i></p> <p>DLP Planning Ltd:</p> <ul style="list-style-type: none"> • Unclear how either option have been derived or what evidence supports them. They need to be justified by robust evidence. • The target should be that set by the East of England Plan (equivalent to 600 dwellings per annum), and it is unclear why it has been reduced. • The need and demand for housing has not reduced, and the two options would deliver less than the nil-net migration of 12,400 dwellings. The latter approach is in any event unrealistic given the proposed level of jobs growth in the Core Strategy (ideally they should be in balance). There needs to be a better relationship between housing and jobs. The housing target should be set at the level to meet the needs identified by the SHMA. 	<p>Council's conclusions take account of a range of factors, including community feedback.</p> <p>Comments noted, no action required. See also related responses to Question 10. A robust evidence base is in place to support the housing target. The housing target takes on a balanced approach to many local factors, including housing need and demand, household growth, migration, economic development and jobs growth. There is no target in the East of England Plan, and meeting nil-net migration level of housing would have too great an environmental impact.</p>
<p>Apsley Development Limited:</p> <ul style="list-style-type: none"> • Both housing options are too low as neither takes account of migration. • A lack of housing provision will not only result in increasing housing problems but it will be detrimental to the overall economic well being of the Borough. • Disagrees with the Council's approach of only providing sufficient housing to meet natural growth as it disregards migration. 	<p>Comments noted, no action required. See response to DPL Planning Ltd above.</p>
<p>Banner Homes Ltd:</p> <ul style="list-style-type: none"> • The target should be in excess of the nil-net migration figure (12,400 dwellings) to meet the needs of the population and to reflect the desirability 	<p>Comments noted, no action required. See response to DPL</p>

<p>of the borough.</p> <ul style="list-style-type: none"> • A target less than this will not sufficiently satisfy demand nor provide more affordable housing. <p>CALA Homes:</p> <ul style="list-style-type: none"> • As a minimum the Core Strategy should aim to plan for nil-net migration. • There is a need for a much higher figure if Hemel Hempstead is to continue its role in meeting sub-regional housing needs. • Dacorum will continue to experience migration into and out of the borough. Even allowing for nil-net migration rate, local people will be forced out of the housing market as incoming residents, particularly from London, can out bid them for housing. • A lower option (especially Option 1) will worsen affordability and this will be exacerbated if neighbouring authorities do not make up the shortfall. <p>Crest Nicholson object to both options as they are too low and unrealistic, and do not accord with recent 2008 household projections. The latter suggests a figure of around 13,000 new homes i.e. a rate of 520 homes per annum.</p> <p>E J Hillier Will Trust stress that neither option in the Core Strategy will fully provide for a nil-net migration level, do not adequately meet the needs of the borough or reflect recent 2008 household projections.</p> <p>Gleeson Strategic Land:</p> <ul style="list-style-type: none"> • The nil migration/natural growth approach is misconceived and not supported by evidence. • Dacorum is an area of high housing need and has an affordability crisis. • The two housing options will only exacerbate these problems. • The lack of housing will mean existing residents will be outbid and displaced, contrary to the aim of creating inclusive and sustainable communities. • Net in migration should be allowed with the environmental constraints of the borough. 	<p>Planning Ltd above. The overall affordable housing target in Policy CS19 is 35%.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above. Hemel Hempstead will be the focus of the highest level of growth. This will help reinforce its sub-regional role.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above.</p>
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<ul style="list-style-type: none"> • The housing provision should be based on the latest 2008 based household projections (around 13,500 homes) or if constrained Option 2. <p>Grand Union Investments:</p> <ul style="list-style-type: none"> • The absence of a housing trajectory plan undermines the Core Strategy housing options. • The options are over-reliant on urban windfall sites, particularly in Berkhamsted, which is unrealistic and undeliverable. • Policy CS19 needs to be more flexible to ensure that development is achievable and deliverable. • The housing options should be deleted from Policy CS17 until there is evidence provided to substantiate them. • Policy CS19 should be reworded and the reference to defined educational zones in the Green Belt removed. <p>Linden Homes (Chiltern) Ltd feel that restricting housing growth to nil-net migration level / natural growth levels is too low and unrealistic. The recent 2008 household projections would indicate 13,000 new homes over the plan period (520 pa).</p> <p>W Lamb Ltd:</p> <ul style="list-style-type: none"> • Both options are too low and take no account of national or regional migration. • Migration is important to Hemel Hempstead as it is highly sustainable and close to London. • It will increase housing problems and prove detrimental to the economy of the Borough. <p>Waterside Way Sustainable Planning Ltd:</p> <ul style="list-style-type: none"> • The latest household projections demonstrate an increased housing requirement for Dacorum. • The evidence base is based on older and lower figures, and the options should therefore be revised upwards. • The authority suggests a requirement of 14,000 	<p>Comments noted, no action required. See response to DPL Planning Ltd above. A housing trajectory will be included in the Pre Submission version of the Core Strategy. Policy CS19 is sufficiently flexible to ensure delivery of new sites. Reference to defined educational zones in the Green Belt should be retained as they are important to the long term planning for school places in Berkhamsted.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above.</p>
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<p> dwellings based on the SHMA, the affordable housing need and 2008 household projections.</p> <ul style="list-style-type: none"> • The current housing options have been artificially reduced and conflict with the previous requirement in the Emerging Core Strategy and with the evidence base. <p><i>Landowners who agreed with housing option 1:</i></p> <p>ING Real Investments</p> <p><i>Landowners who agreed with housing option 2 made the following comments:</i></p> <p>Duckhall Farm, Bovingdon owners:</p> <ul style="list-style-type: none"> • The Core Strategy needs to plan to provide housing for all parts of the community. • Limiting development to a simple capacity assumption conflicts with both the vision and strategic objectives, particularly 'meeting the needs of the population. <p>Barratt Strategic supports the principle of the approach set out in Option 2, which includes urban capacity sites as well as some local allocations. However, they seek clarification on a number of general and detailed matters in relation to the policy.</p> <p>Taylor Wimpey UK Ltd confirms that the site at Durrants Lane/Shootersway is deliverable in the early part of the plan period. The strategic sites should be identified in upper case policy either as part of changes to Policy CS1 or CS17, or both.</p> <p>The Crown Estate:</p> <ul style="list-style-type: none"> • welcomes the flexibility provided in Policy 17. • However, there may be issues with the timing of this, particularly if the new sites are greenfield or larger sites, as there will be a lead in time. • It is unclear how Dacorum are justifying 370 dwellings per annum, other than it is based on 'urban capacity'. This option may lead to development of smaller dwellings and apartments, less infrastructure being provided and more piecemeal planning of 	<p>Comment noted, no action required.</p> <p>Comment noted, no action required. The Core Strategy does seek to achieve a range of housing.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above and related response to Question 10.</p> <p>Comments noted, no action required. There is no need to refer to the site in Policy CS1. It is clearly identified as part of the housing supply in Table 8.</p> <p>Comments noted, no action required. See response to DPL Planning Ltd above and related response to Question 10. The housing target strikes a reasonable balance in</p>
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<p>development.</p> <ul style="list-style-type: none"> • This option also relies on windfall sites and rural exception sites. It is questionable whether such sites should be included. • Option 2: The basis for this level of growth is not clearly justified in terms of national policy guidance in the form of PPS3. • Dacorum should clearly set out how it has taken PPS3 paragraph 33 into account to arrive at the housing options. • The levels of growth proposed in the consultation document are unlikely to result in sufficient affordable housing being built. Option 1 will only result in 108 affordable homes per annum, and Option 2 will only result in 130 affordable homes per annum. The SHMA estimates that the required level of affordable housing is around 220 per annum. • Proposing low levels of growth will be unlikely to achieve the necessary levels of new infrastructure. <p>Zog Brownfield Ventures Ltd:</p> <ul style="list-style-type: none"> • Supports Option 2 and the inclusion of local housing allocations in achieving the overall housing target. • They support the inclusion of Hicks Road site as a Strategic Site. • However, they believe that the site is capable of accommodating up to 110 units, as part of a mixed use development scheme and as such Table 8 should be amended to reflect this figure. 	<p>delivering opportunities for affordable homes, family homes and associated new infrastructure, against other factors.</p> <p>Comments noted, no action required. Support for Hicks Road allocation welcomed. See response to Question 28 on housing capacity.</p>
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Providing Homes and Community Services

QUESTION 10

Do you support the approach to 'Providing Homes' set out in Section 15?			
Responses received	81		
Yes - Key organisations	9	No clear answer:	
(inc. 3 duplicate)		Key organisations	3
Individuals	11	(inc. 1 duplicate)	
Landowners	4	Individuals	3
Total	24 responses	Landowners	0
		Total	6
No - Key organisations	11		
Individuals	25		
Landowners	15		
Total	51 responses		
Response	Actions		
<p>Comments from key organisations:</p> <p><i>The following organisations gave no clear answer:</i></p> <p>Markyate Parish Council supports the approach. They do have information on needs in their survey, but of necessity numbers seeking to move are small. Although affordable housing is needed, larger detached properties are also required in order for those who need a larger property and want to live in the area, and in order to keep a good mix of people.</p> <p><i>Those organisations who disagreed made the following comments:</i></p> <p>Berkhamsted Town Council (Cllr Stevens) states:</p>	<p>The Council's response to the amount of housing to be provided is given under Question 9. There is a cross reference to the section on the Growth Issue in Chapter 4. Paras 4.9 - 4.14 are relevant here.</p> <p>Comments noted in both instances, no action required. Information on housing need is acknowledged. The Borough Council is seeking to carry out a local needs housing survey in the near future.</p> <p>Comments noted, no</p>		

- There appears to be little rigour to reconcile the data with the historic housing provision and the projections. This will have serious implications for continuing under provision, in particular of affordable homes.
- Para 15.5 omits to state the actual numbers of completed affordable homes in recent years. On this basis, the projected annual numbers of affordable homes built over 25 years would be 137 under option 1 or 159 under option 2.
- Given that the SHMA projects a need for 5,300 affordable homes over the plan period (a build of 212 pa), there will be a considerable shortfall of affordable homes becoming available without a sustained commitment by the Borough to achieve these aspirations.
- The projections for all house building assumes no net-migration which runs to local evidence of significant numbers moving into the settlements and the pressure for nursery and school.
- There is no policy that makes deliverability of sufficient affordable homes a cornerstone of the strategy? It is not sufficient merely to 'monitor' delivery.

action required. The Council has strived to carefully balance many environmental, social and economic factors and the impact on local infrastructure and the character of settlements, in setting a housing target. This has taken into account evidence of need and demand and the impact of migration. Delivering affordable homes is a corporate priority and is a key objective of the Core Strategy. The policies and proposals in the Core Strategy seek to deliver significantly higher levels of affordable housing than in the past. The requirements of Policy CS19 regarding levels of affordable housing contribution are more stringent than in the Local Plan, but are considered to strike the right balance between need and viability.

Bovingdon Parish Council:

- Consideration should be given to lowering the affordable housing threshold in the larger villages (including Bovingdon).
- There is a lack of specific policies supporting the provision of elderly accommodation.

Comments noted, no action required. The Core Strategy aims to lower the thresholds for affordable homes in all settlements from current Local Plan levels. The Core Strategy seeks to protect existing and encourage and deliver new community facilities. Elderly accommodation is also going to be addressed through the Council's housing strategy and through work on vulnerable adult groups being

<p>Hertfordshire County Council (Forward Planning) queries the housing projections and the housing/employment balance.</p> <p>Hertfordshire County Council (Herts Property):</p> <ul style="list-style-type: none"> • It is important to understand the locations, phasing, and estimated yields of housing through the plan period so that a robust assessments is made of what new infrastructure that may be required. • Small scale local needs schemes on rural exception sites can yield disproportionately high numbers of children. <p>The Highways Agency:</p> <ul style="list-style-type: none"> • The Transport Infrastructure Assessment report (August 2010) prepared by URS on behalf of Dacorum Borough Council is not consistent with the proposed housing allocation outlined in Table 7. • It is unclear whether some of the proposed transport 	<p>commissioned by the County Council (Health and Communities Service). A new paragraph will be inserted to the section on housing mix to refer explicitly to the needs of the elderly, following County Council advice.</p> <p>Comments noted, no action required. See responses to these issues below. The jobs target has been revised following the results of new technical advice. See responses to Question 6.</p> <p>Comments noted, no action required. In setting a housing target the Core Strategy seeks to provide agencies with greater certainty over the type, scale, timing and location of development for the purposes of delivering infrastructure. The housing trajectory in Appendix 2 will show expected delivery trends. Phasing will be considered further through the Site Allocations DPD. Liaison with the County Council will continue on these matters.</p> <p>Comments noted. The Infrastructure Delivery Plan will be updated annually to reflect infrastructure needs and decisions on housing levels.</p>
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schemes outlined in the Transport Infrastructure Assessment and the Infrastructure Delivery Plan will still be brought forward in the same form or if at all.

The Home Builders Federation:

- The attempt to specify the size of market homes should be omitted from future iterations of the Draft Core Strategy in accordance with PPS3 (para 29).
- The HBF is unaware of any demand for live-work units (para 15.29). Development plan documents may only specify the size and type of affordable housing. They cannot dictate the make-up of the market element of schemes. The policy should be amended so that it is clear that it refers only to affordable housing.
- They object to the proposal to seek the off-site provision of affordable housing or financial contributions where it is unviable to provide affordable housing on site (para 15.34). To seek affordable housing contribution off-site suggests that the need for a contribution on the original site was never essential to the acceptability of the scheme - that affordable housing was never needed to create a mixed and balanced community.
- If affordable housing is needed on site in order to make the development acceptable in planning terms, then other policies will need to be waived or else applied more flexibly to ensure a viable development can come forward.

Comments noted throughout, no action required. PPS 3 does not state that authorities cannot refer to the size and type of market housing. Authorities are urged to plan for a mix of housing and to also reflect the nature of demand and profile (PPS3 paras. 20-24) It provides useful information for comparison against the requirements of affordable homes, and is seen as providing a broad guide and benchmark to housing mix rather than to be applied as a rigid standard. As demand for different dwelling types changes over time, Table 9 will be removed from the Core Strategy and relevant information included in the forthcoming Affordable Housing SPD. SPDs can be reviewed more easily and can ensure the most up to date information is available. The Core Strategy acknowledges that viability is a key consideration in determining the level and type of affordable homes (Policy CS19). There may be circumstances where on-site provision is difficult and a contribution off-site or financially is sought in

<p>The Jehovah's Witnesses do not support the approach, but gave no reasons.</p> <p>The New Conservation Society:</p> <ul style="list-style-type: none"> • The housing demand figures, based on the regional Strategic Housing Market Assessment (SHMA), are unsound. • The SHMA is prefaced with significant caveats, including the base date of the data, the impact of the recession on the housing market and international migration. • Beside the discrepancy in planning period (SHMA to 2021, Core Strategy to 2031) there is much uncertainty in the population projection upon which housing demand is based, which in turn is crucially dependent on the success or otherwise of the new Government's stated policy of capping non-EU net inward migration. • They are concerned that no irrevocable planning decisions for housing, in particular any resulting in loss of Green Belt, should occur through over-estimating from this or any other factor. • The considerable number of house extensions that have taken place in Dacorum in recent years should also be taken into account. Most extensions result in higher occupancy levels and typically take up former garden space. They thereby deplete a recognised and important habitat resource, so it is perfectly appropriate in Green Accounting terms for this to be offset by a reduction in the allocation of new greenfield sites for further development. • A lower target should be set, or no target at all, based upon the considerations set out above. <p>The NHS Trust is concerned that the supporting text to the Hospital Site Zone does not sufficiently capture the requirements of the Trust in line with its aspirations in Hemel Hempstead (see response to Question 17).</p> <p>Royal Mail generally supports the Council's approach. Policy CS18 should be amended to explicitly identify</p>	<p>lieu. This is an approach familiar to the development industry and is supported in PPS3 (para. 29).</p> <p>Comments notes, no action required.</p> <p>Comments noted throughout, no action required. The SHMA is only one component of the evidence base, and the Council has not solely relied on its findings and conclusions in setting a housing target. It will be looking to supplement its results through a new housing needs survey and updating its Housing Strategy. The results of recent population and household projections and the Council's housing register have also been taken into account. There are other factors that the Council has balanced in determining this level of housing. It would be difficult to systematically relate the loss of garden space to reducing greenfield allocations. Not all garden space is of high habitat importance.</p> <p>Comments noted, and see response to Question 17.</p> <p>Comments noted, no action required. Site</p>
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<p>viability as one of these considerations so that it reads as follows: "...guided by the Strategic Housing Market Assessment and other market and site-specific considerations <u>including viability</u>". Royal Mail welcomes and supports the flexibility provided in Policy CS19.</p> <p>Berkhamsted Town Council state that in Policy CS19 there is no justification for different thresholds between Hemel Hempstead and elsewhere. The thresholds seem to be also based on a density of 30 dpha that is no longer a national requirement and not suitable for the town.</p> <p><i>The following organisations support the approach:</i></p> <p>Friends of the Earth support the approach as long as there is good infrastructure and adequate open spaces. Plus the considerations of renewable, and water and waste supply.</p> <p>Hertfordshire Chamber of Commerce and Industry comment that part of plans to increase the number of traveller pitches should be to encourage active participation in the local economy.</p>	<p>specific factors would already cover viability as a consideration. This is reinforced by the cross reference to Policy CS19 which includes a specific reference to viability.</p> <p>Comments noted, no action required. The thresholds reflect the different scale of opportunities in these settlements (i.e. larger sites above 10 units are more common in Hemel Hempstead than elsewhere). The area thresholds do not imply that particular densities of development would be acceptable in any given location.</p> <p>Comments noted, no action required. The Core Strategy seeks to deliver new development with a strong emphasis on sustainability and renewable technology, and that it is properly supported by infrastructure.</p> <p>Comments noted, no action required. The new pitches are to meet an identified need. It is not a planning requirement in meeting the accommodation needs of travellers or any other community group, to have to participate in the local economy. The Council is however supportive of non-planning initiatives such as job seeking and skills development. This</p>
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<p>Hertsmere Borough Council welcomes the strategy's commitment to long-term Gypsy and Traveller provision, and its balanced approach to strategic employment and residential development.</p> <p>The Ministry of Justice support providing a mix of new housing to meet local needs. Option 2 provides the highest number of affordable homes within the Borough and utilises pockets of open space within existing settlements, thus reducing 'urban sprawl' and would also allow investment in the local infrastructure through planning obligations.</p> <p>Tring Town Council wants account taken of the new Coalition Government infilling guidelines.</p> <p><i>The following organisations supported the approach but gave no reasons:</i></p> <ul style="list-style-type: none"> • National Grid Property & Gas • Nettleden with Potten End PC • Taylor Wimpey UK Ltd <p>Comments from individuals:</p> <p>Gypsy and Traveller sites are classed as 'highly vulnerable' development. This is not appropriate in flood zone 3. The sequential approach to allocating sites for housing, including gypsy and traveller sites, should be followed.</p>	<p>applies to all residents (see Policy CS14: Economic Development).</p> <p>Support welcomed.</p> <p>Support for Option 2 noted.</p> <p>Comments noted, no action required. The Coalition government has redefined garden land so that it is no longer classified as "brownfield". This new approach does not preclude the use of garden land for housing, although its impact on the character of the site and the neighbourhood will need to be more carefully assessed when making planning decisions.</p> <p>Support welcomed.</p> <p>Comments noted, no action required. Policy CS22 aims to provide broad guidance on the suitability of sites and does not seek to take into account all site related constraints. Many of these constraints are</p>
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<p>Need for emphasis on an aging population. New homes built to lifetime Home Standards will not overcome the problem. Clause b) in Policy CS18 should include housing for the elderly, providing a range of levels of care.</p> <p>Objection to Policies CS 17-21 inc. and the supporting text:</p> <ul style="list-style-type: none"> • In paragraph 15.10, the 'demand' in the first sentence should be replaced by 'need'. Assuming nil-net migration this would reflect the measurement of housing supply against the actual requirement of the local community rather than the aspiration. • In paragraph 15.15, the proportion of new homes meeting the definition of 'affordable' in both options (27.5% in Option 1 and 29.0% in Option 2) is too low and inconsistent with the 35% affordable homes mentioned in paragraph 15.31. The numbers in paragraph 15.15 are not reconciled with those in Table 9.) The Core Strategy Issues and Options Paper (May 2006) suggested a figure of 40%, which is more in line with expectation. If this was used, the 	<p>already covered elsewhere by national advice or by existing plan policies. It is an accepted national approach that new development (including pitches) should be directed away from areas of high risk. This approach is set out in Policy CS31.</p> <p>Policy CS18 is a general policy covering the needs of a variety of forms of accommodation, including that of the elderly. More detailed work on housing for the elderly is to be undertaken by the Council as part of moving forward its Housing Strategy, and by the County Council (Health and Communities Services) in addressing the needs of vulnerable adult groups. The issue of elderly care needs will be addressed through the addition of new supporting text (see above response). Comment noted, no action required.</p> <p>Comment noted, no action required. The level of housing sought under Policy CS19 is reasonable. It balances viability of development and the achievement of affordable homes against the delivery of sites. The figure also</p>
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figures for affordable homes in the table in paragraph 15.15 would be increased to 3,400 and 4,500.

- The proposal to phase housing sites is supported, but the six year New Homes Bonus programme could result in the Council encouraging an acceleration of that phasing to take advantage of the 'Bonus'. A statement is needed that the New Homes Bonus will not affect responsible phasing over the whole of the strategy period.

The infrastructure is inadequate in Berkhamsted - especially roads and parking. There appears to have been plenty of infilling of spare land. Any encroachment on greenfield sites (e.g. Hanburys) will be detrimental to Berkhamsted. The lack of a local hospital should prevent any increase in the population of both Berkhamsted and Hemel Hempstead. The expansion of Berkhamsted is unsustainable without further public transport.

Local people should be given priority over housing and the sites that would have been used for travellers could be used by local people instead. This should not involve the use of Green Belt land.

accords with that set out in the East of England Plan (Policy H2). The numbers in Table 9 take into account historical completions where a lower threshold was in operation. It is difficult to predict affordable housing delivery on windfall sites that make up part of the housing supply, and not all qualifying sites will achieve 35% affordable housing due to viability constraints.

Comment noted, no action required. The Council is keen to optimise the benefits of the New Homes Bonus Scheme. This will not override the need to ensure all schemes are appropriately timed, provide necessary infrastructure, and are of a high quality.

Comments noted, no action required. See responses to Questions 18-22 in relation to issues raised over Berkhamsted. The range of services provided by the hospital is a matter for the relevant health authorities. This factor by itself does not imply that future housing should not be provided in the borough.

Comments noted, no action required. New housing is chiefly geared to meeting the locally generated housing need of existing residents. It is not appropriate or

<p>Agrees with response from Berkhamsted Town Council regarding Policy CS 19. Also the correlation of 10 houses/ 0.3ha with 5 houses/ 0.16ha seems to be based on a density of 30 per hectare which is no longer a national requirement and would in any case be inappropriate in many areas of Berkhamsted.</p> <p>There is no justification given in Policy CS19 as to why the threshold for the provision of affordable housing is different in Hemel Hempstead from the rest of the borough.</p> <p>A home does not normally include "social, leisure and community facilities and services". This section needs renaming. All these facilities need to be within walking distance of dwellings. For council homes there should be a clause that the minimum number of people residing in that home should be equal to the number of bedrooms or that house must be forfeited for one with fewer bedrooms. This would help reduce the number of new homes required.</p>	<p>practical for the Council to restrict the availability of housing, although nominations for affordable housing tend to be for local residents. There is always a natural flow of people into and out of the borough. Very few new traveller pitches are actually envisaged for travellers whose needs, unlike the settled community, have not been met through additional accommodation in recent times. The Council has had to look to the Green Belt because of the lack of available and suitable urban sites.</p> <p>Comments noted in both cases, no action required. See response above to Berkhamsted Town Council's comments.</p> <p>Comments noted, no action required. The Core Strategy is divided into broad chapters with different sections within these. They are clear and need no change. The Core Strategy seeks to improve the accessibility between new housing and other commercial and community facilities. It is not practical or reasonable to control occupancy levels for Council homes as suggested. The Council</p>
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<p>Strongly opposes greenfield and Green Belt land being sacrificed in order to ensure a steady supply of housing (Paragraph 15.12). Such land must be protected.</p> <p>Paragraph 15.23 states that any housing target adopted will be viewed as a minimum, implying that residential growth would be unlimited. Growth should be capped to preserve the rural character of the borough.</p> <p>Affordable homes should be scaled down. Home owning population makes for a better community.</p> <p>Disagrees with paras. 15.39-15.42. Queries whether there is a need for additional traveller sites. The Council should not be increasing the number of traveller sites. They should be accommodated on existing pitches.</p>	<p>has taken steps to reduce the incidences of under occupation through management of its homes. Comments noted, no action required. See response to Question 9.</p> <p>Comment noted, no action required. National guidance (PPS3) states that all housing targets should be treated as a minimum. This does not imply that controls will be abandoned in favour of unlimited growth or that there would be support for inappropriately located development. Agree that the text should be amended to clarify the target is not an open ended figure. Comment noted, no action required. National guidance requires local authorities to plan for a mix of housing to meet the needs of all of the community. There is an identified large scale housing need that should be addressed.</p> <p>Comments noted, no action required. National guidance requires local authorities to plan for a mix of housing to meet the needs of all of the community, including travellers. There is an unmet need for new traveller pitches that should be addressed. Good practice points to the advantages of smaller over larger sized sites. Extending existing large sites generally</p>
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<p>All options are too large for the existing services and infrastructure, and these should be improved and expanded before adding housing capacity. If targets are necessary, it should be limited to what can be achieved through redevelopment of existing brownfield sites, within existing settlement boundaries. There should be no incursion into the countryside or the Green Belt. The natural and rural character of Dacorum should be preserved and all of the borough's existing Green Belt and greenfield land protected.</p> <p>There is no explicit commitment to avoid building on Green Belt land or to defend Green Belt objectives such as avoiding coalescence of communities.</p> <p>It is no longer a national requirement to have a density of 30 houses per hectare. This appears to be the density that is being proposed which is completely inappropriate for many areas in Berkhamsted.</p> <p>If housing stock has been lost through the right to buy scheme replacements should be purchased as they come on the market rather than building more homes. The borough is already overcrowded and the infrastructure should be improved. Growth does not have to take place for regeneration in Hemel. Regeneration should take place first and then growth. No building should take place on the</p>	<p>leads to greater impact and management issues.</p> <p>Comments noted, no action required. The evidence base does not point to any significant problems with either option in relation to services and infrastructure. New development must address its impact on infrastructure (as required by Policy CS35).</p> <p>Comments noted, no action required. Government advice states that Core Strategies should not repeat national policy. These Green Belt objectives have been taken into account in formulating the policies and proposals in the Core Strategy.</p> <p>Comments noted, no action required. No minimum density is being promoted through the Core Strategy. The density of schemes will be dependent on the location of a site, its nature, and the character of the surrounding area. The Urban Design Assessment reflects existing density patterns in the town.</p> <p>Comments noted, no action required. The housing target takes into account locally generated housing need. The right to buy is not significant in relation to the loss of affordable homes given the</p>
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<p>Green Belt. It is there to prevent towns and cities sprawling. The focus should be on improving the current infrastructure so that it can cope with the population of today. Council housing stock should be managed more effectively and new houses bought from the private sector if more affordable homes are needed. Does not believe most people in Dacorum, who have been consulted, have asked for an increase in Gypsy sites.</p>	<p>tightening of qualifying criteria and has been declining over the last few years. There is no evidence that the borough is overcrowded or that infrastructure could not support either housing option. Not all regeneration can take place without growth being in place to support and fund it. Council housing is managed effectively as levels of vacancies are very low relative to the private market. It is not always practical or suitable to buy new homes to meet affordable housing needs. See above responses to traveller pitches.</p>
<p>A financial contribution should not be sought in lieu of affordable housing on sites which fall below the thresholds. Small complex schemes often have viability concerns and this could deter some developments. Developers may be put off developing small sites. There will be a contribution made anyway through the New Homes Bonus. The Housing Associations should decide what proportion of Social Rent to Shared Ownership/Intermediate Rent on each site. For schemes in Berkhamsted or Tring or elsewhere the requirement for Social Housing is going to be difficult to arrange. Will a well managed Housing Association want to take on small numbers of properties scattered about?</p>	<p>Comments noted, no action required. The evidence base does not point to major viability concerns on smaller sites. The mix of housing will be determined in relation to the SHMA / local needs survey, the specific of the development, and in conjunction with Housing Associations. There is no evidence that Housing Associations could not reasonably cope with managing smaller groups of properties. Not all forms of affordable housing products necessarily have to be managed by them.</p>
<p>There is not enough provision made for people who cannot afford the affordable housing. These should be council properties. No new housing should be built unless we have</p>	<p>Comments noted, no action required. Delivering homes that are affordable to all is a</p>

improved public transport infrastructure and a new hospital. Supply should be measured against need and not demand. Option 2 is completely unacceptable. Disagrees with the figures in the table to Paragraph 15.15.

high priority of the Core Strategy. See earlier comments above on infrastructure and the hospital. The priority of the Core Strategy is to meet as far as is possible locally generated needs. These have to be balanced against other environmental and economic factors, the capacity and provision of additional infrastructure and the character of settlements.

The percentage affordable housing target in Paragraph 15.31 is too small and out of line with need identified by the SHMA. The numbers of affordable homes should be increased, without any increase in the total number of new homes, to about 40% of the total.

Comments noted, no action required. See responses above on affordable housing.

Paragraph 15.30 should recognise that Affordable Housing can include Low Cost homes for sale. Policy CS20 should be amended such that development is permitted if it meets any of the identified criteria rather than all three. The approach to providing homes should recognise the important role that new housing in villages in the Borough can play in supporting the viability of rural services as highlighted in paragraph 15.36 of the document.

Comments noted, no action required. Low Cost homes could be provided as part of a mix of housing on a site, but do not comply with national definitions for 'affordable' in PPS3. All three criteria are important and are essential to ensuring a suitable scheme is promoted. The important role of new housing in villages is acknowledged in the Core Strategy.

Need for emphasis on the needs of an aging population. New homes built to lifetime Home Standards will not meet the needs of people who will become incapacitated through age. Need to make it clear that clause b) in Policy CS18 should include housing for the elderly, providing a range of levels of care.

Comments noted, no action required. See responses above on accommodation for the elderly. The Lifetime Homes standard is not seen as meeting all of this group's long term requirements, but having flexible housing can help elderly residents adapt to changing circumstances.

<p>The level of proposed new pitches has not been justified properly. The Council should set its own figure. There already are enough pitches and sites in Dacorum and the rest of Hertfordshire should take up an equal distribution if more are needed. New sites should be open and not screened and landscaped.</p> <p><i>These individuals supported the approach for the following reasons:</i></p> <p>Rural exception sites (Policy CS20) should be in selected villages not adjoining the boundaries of the villages. The latter should be safeguarded. There is no need for additional traveller sites in Dacorum.</p> <p>It is essential that affordable housing is built in the Little Gaddesden area in order to keep families together and enable older people who have lived in the area for sometime to downsize and remain close to all their friends. Small scale development is required. New incomers driving local house prices out of reach of local inhabitants. One problem is allowing rural houses to be extended by 50% as against 30% expansions in urban areas.</p>	<p>The background to the policy makes it clear that this does include housing for the elderly.</p> <p>Comments noted, no action required. The level of pitches has been based on a detailed sub regional assessment that identified that there was unmet need in the borough. It is important that sites are properly designed and, where necessary screened and landscaped.</p> <p>Comments noted, no action required. In most cases, there are often very limited opportunities for sites within village boundaries. The next best location is immediately adjoining boundaries. See above responses on traveller pitches.</p> <p>Comments noted, no action required. Point acknowledged. Opportunities are likely to be limited if harm to the character of such villages is to be prevented. A small scale rural exception site could provide such an opportunity and help meet local housing need. Housing prices are high in rural locations, and the extent to which a property can be extended makes little difference to affordability.</p> <p>Support is welcomed.</p>
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<p>The general approach is well thought out and is reasonable. Encroaching onto green belt in option 2 does not seem to follow the approach. Proper planning of infrastructure must be in place first to accompany the new homes.</p> <p>There must be greater control over the construction of basements in both rural and urban areas. Basements should also be subject to planning permission and more detail provided at that stage as to how the material will be excavated and removed from the site. The heavy vehicles involved in this process have an adverse effect on carbon emissions, the character and safety of the countryside, and the condition of roads.</p> <p>Comments from landowners:</p> <p>Pennard Holdings own land on the edge of the Flamstead which would be suitable for housing development, particularly for local needs housing. They would welcome an active involvement in the preparation of the neighbourhood / parish plan for the settlement.</p> <p>Quilichan Consultancy suggests that land adjacent to Rose Cottage, Bank Mill Lane should be identified as a new Strategic or Local Allocation under Option 2 to the housing programme.</p> <p>DLP Planning Ltd:</p> <ul style="list-style-type: none"> • Neither the amount of housing needed to support natural growth and the balance between jobs and homes has been taken into account in setting the housing targets. The potential consequences of this action have been ignored. • The housing targets are set at levels that plan to meet less than local need, do not meet the future housing needs of people that work locally, and ignore the relationship between housing supply and the supply of new jobs. The annual housing target should be revised accordingly. <p>Akzo Nobel Pension Scheme:</p> <ul style="list-style-type: none"> • The levels of housing cannot be planned without accommodating any net inward migration. Hertfordshire is part of London's commuter belt and 	<p>See comments on infrastructure and response to Question 9.</p> <p>Comments noted, no action required. This is not a Core Strategy issue, and is best addressed through the Development Management process.</p> <p>Comments noted, no action required. Interest acknowledged, but any progress would be dependent on the extent any proposal meets the criteria in Policy CS20. This site can be considered through the Site Allocations DPD.</p> <p>Comments noted, no action required. See response to Question 6 regarding revisions to job targets.</p> <p>Comments noted, no action required. These factors are key and have not been ignored. They have been taken into account and carefully balanced against a host of other factors (see para. 15.15 of the Draft Core strategy) in setting the housing target.</p> <p>Comments noted, no action required. See response to DLP Planning Ltd above.</p>
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<p>not seek to encourage net inward migration is unrealistic.</p> <ul style="list-style-type: none"> • Support higher levels of growth at Hemel Hempstead given its status as the Main Centre for Development and Change within the Borough and optimising opportunities for using previously developed land. • They seek clarification as to whether the defined urban sites (a) and defined locations in Hemel Hempstead (b) mentioned in Table 7 will be included in the emerging Site Allocation DPD. • They are concerned about the basis on which the Council has calculated developer contributions to infrastructure for each housing option. This information is not included in the draft core strategy and clarification is required as to how Dacorum has calculated developer contributions for infrastructure. • They support that the mix of housing guided by the Strategic Housing Market Assessment (SHMA) and other market and site-specific considerations, as set out in Policy CS18. • With regard to affordable housing, they welcome the flexible approach set out in Policy CS19. They stress that judgments will have to have regards to housing mix and the overall viability of the scheme and any abnormal costs. 	<p>Comments noted, no action required. Support acknowledged.</p> <p>Comments noted, no action required. Where appropriate, such sites will be included in the Site Allocations DPD. Comments noted, no action required. The information in the table in para. 15.15 is provided for illustrative purposes only. Detailed guidance on developer contributions is provided in the Planning Obligations SPD (April 2011) and will be developed through work on the CIL.</p> <p>Support welcomed.</p> <p>Comment noted, no action required. Support acknowledged and Policy CS19 already seeks to achieve this.</p>
<p>Apsley Development:</p> <ul style="list-style-type: none"> • Objects to the managed release mechanism in Policy CS17. It is unwieldy and ineffective unless adequate supply is made at the outset. • The Core Strategy should not identify individual sites unless they are to form strategic allocations. It is simply not feasible for the Borough Council to identify sites when it has yet to determine the housing provision target. Table 8 should therefore be deleted. 	<p>Comments noted, no action required. This is considered to be a reasonable approach to managing supply. The Core Strategy identifies a sufficient and robust supply of housing over the plan period. It is important for the Core Strategy to identify key locations needed to deliver Option 2.</p>

<p>Banner Homes Ltd state:</p> <ul style="list-style-type: none"> ● They support the recognition of the importance of decent homes to people's wellbeing and for achieving balanced and sustainable communities. ● The proposed options for the Housing Programme are too low. Option 2 would not deliver adequate new homes to meet the forecast need of the borough assuming a nil-net migration (12,400 dwellings). It also includes an allowance for 13.5% of the new dwellings to come from windfall sites that is unrealistic and entirely contrary to the purpose of plan making. The scope for new housing to come forward on an ad hoc basis is significantly less. <ul style="list-style-type: none"> ● The Vision and Strategy for the borough seek to provide new homes to meet the needs of the population and yet the Housing Programme proposed options will be well below the forecast need. ● It is also unrealistic to plan for a nil-net migration. The Housing Programme should aim to provide significantly more housing than is required by the population to allow for a degree of inevitable migration. Otherwise the issue of housing affordability, which is one of the key challenges for the borough, will not be affected. ● The proposed Housing Programme is also at odds with the aspiration to strengthen economic prosperity. New commercial enterprise will require skilled workers who will not necessarily be available locally. Affordable homes will therefore also need to be available to help secure commercial investment. ● The increase in the number of new dwellings to be provided would need to be reflected by higher annual targets in Policy CS17. ● They support the proposed mechanism in Policy CS17 which would allow the Council to take action to increase the supply of deliverable housing sites. ● They support Policy CS19 Affordable Housing which would require sites of 5 or more dwellings in Berkhamsted to normally provide 35% affordable housing. This is subject to the level of affordable 	<p>Comment noted, no action required. Support acknowledged.</p> <p>Comment noted, no action required. It is reasonable and logical to account for windfalls in the housing supply. They have historically been an important part of the housing supply in Dacorum (see Housing Land Availability Paper (July 2011)) and there is no reason why this should not be the case in the future. The approach taken to windfalls accords with national guidance (see response to Question 9).</p> <p>Comment noted, no action required. See response above.</p> <p>Comment noted, no action required. See response above.</p> <p>Comment noted, no action required. The housing target takes this factor into account and balances this against other factors.</p> <p>Comment noted, no action required. No increase in numbers is required.</p> <p>Comment noted, no action required. Support welcomed.</p> <p>Comment noted, no action required. Support welcomed.</p>
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housing having to have regards to overall viability of the scheme, which could allow for alternative contributions and abnormal costs.

CALA Homes:

- They believe neither Option 1 nor 2 provide for a sufficient level of housing.
- Table 7 includes windfall sites and gypsy/traveller pitches. PPS3 advises that the former should not be included in the first ten years of land supply. It is not clear from the table whether or not this advice has been heeded or how the included figure has been derived. Gypsy pitches by definition do not meet local needs and therefore should be considered separately, and additional, to housing provision.
- Policy CS17 is inconsistent with Table 7. The annual figures in the policy should be 395 for Option 1 and 455 for option 2. A higher level of provision is advocated in any event.
- The second part of CS17, when read with Policies CS2 and CS3 amount to a phasing mechanism and potential delays to the release of allocated sites (see response to Q3). They question whether, in the light of the severe under-provision of housing in the Borough, any form of phasing is desirable or necessary. Secondly, to the extent that a phased release of sites may be required, this should be limited to reserve sites that are additional to local allocations, to be called upon if and when the latter do not come forward for development. Thirdly, such sites should be released simply if there is no five year supply of land for housing; reference to a more complex trigger mechanism in the policy is considered unnecessary and overly prescriptive.
- There should be no distinction in Table 8 between strategic sites and local allocations; all are important to the success of the place strategies in their respective settlements. Tring would appear to be particularly poorly served by proposed new housing hence the importance of bringing forward the Icknield Way allocation as early as possible (see response to

Comment noted, no action required. See response to Question 9. Comment noted, no action required. The housing target excludes windfalls in the first ten years of land supply, although they feature in the housing programme. The latter sets out total potential supply in terms of planning for infrastructure and other services.

Comment noted, no action required. Table 7 sets out the housing programme which includes an element of windfalls in years 6-10. The housing targets discount such windfalls.

Comment noted, no action required. See response to Question 3.

Comment noted, no action required. See Council's response to Question 24.

Q24).

CALA Homes suggest the following changes:

- Table 7: (i) deletion of gypsy/traveller pitches; (ii) deletion of windfall allowance or inclusion of, or cross reference to, a note on its derivation and justification.

- Table 8: deletion of distinction between strategic sites and local allocations.
- Policy CS17: (i) An average of at least 500 net additional dwellings will be provided each year between 2006 and 2031; (ii) Delete second paragraph, or amend as suggested above and in response to Q3.

Crest Nicholson point out that the Council proposes to meet only natural growth levels, assuming nil net migration. The annual rate of supply needs to be a minimum of 649 per year to meet household projection levels.

E J Hillier Will Trust object for the following reasons:

- The Housing Land Availability Paper (dated 2009, which updates the 2008 SHLAA) suggests that 79 dwellings will be delivered in Bovingdon through urban capacity. These support the Council's view that in order to accommodate Option 1 numbers only, no greenfield allocations are required.
- The Option 1 figure assumes delivery within Bovingdon from a number of sites which have been identified through the SHLAA. These sites have not been allocated for development and not all will come forward. This over estimates the number of available sites in Bovingdon. If replicated across all settlements, raises fundamental questions as to the soundness of the strategy.

Comment noted, no action required. The Core Strategy sees traveller pitches as part of providing for mainstream housing rather than separate from it. Thus it is seen as contributing to the total supply of housing. This accords with government guidance. See responses above regarding the role of windfalls.

Comment noted, no action required.

Comment noted, no action required.

Comment noted, no action required. The housing target balances social, economic and environmental considerations.

Comment noted, no action required. This is factual and reflects the approach adopted by the Place Strategy to the Core Strategy i.e. no local allocations required under Option 1.

Comment noted, no action required. The housing levels for each settlements are indicative and not targets. It is important that sufficient housing is delivered to meet the boroughwide housing target, rather than necessarily meeting that

<ul style="list-style-type: none"> • They object to the inclusion of windfall sites within Table 7 (and at paragraph 15.22). PPS3 (June 2010) is clear that it is not appropriate for Local Authorities to include windfall allowances unless robust evidence of genuine local circumstances is provided. The Core Strategy contains no specific local justification. Simply extrapolating historic rates of windfall developments is not appropriate. Making an allowance for windfall developments provides no certainty of delivery and as such any strategy which is founded on such an approach is not considered sound. • Paragraph 15.19 of the Core Strategy notes that local allocations will be "used to address local infrastructure deficiencies". This approach does not accord with Circular 05/05 or the provision of the CIL Regulations which came into force on 6th April 2010. <p>Gleeson Strategic Land:</p> <ul style="list-style-type: none"> • The housing provision does not take into account the 	<p>for the individual settlement i.e. delivery rates will vary by location and over time. The Council is confident that the SHLAA and information in subsequent Housing Land Availability Papers is robust and will be delivered. It is carefully reviewing the appropriateness of sites and monitoring their progress through the AMR. Undoubtedly, a small number of sites will fail to come forward. However, there is flexibility in the housing supply, and there is likely to be a constant source of new and alternative sites coming forward to make up for any shortfall.</p> <p>Comment noted, no action required. The housing targets themselves do not include windfalls in years 0-10. It is reasonable to assume for them in years 11+. There is no reason to assume that windfalls will not continue to play a role in housing supply. PPS3 does not preclude such assumptions.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. This is a national trend that the</p>
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<p>ageing demographic of the Borough and the trend to smaller household sizes. This will reduce the size of the working population to the detriment of the local economy.</p> <ul style="list-style-type: none"> • The components of land supply in Table 7 are too optimistic and assume the completion of all committed sites and defined locations. No account is taken of the changes to PP3 to remove minimum densities or change the definition of previously developed land. • Option 2 will lead to net out migration from the Borough. • Support the identification of Marchmont Farm, Hemel Hempstead as a local allocation. However, to meet the guidance in PPS12, all the Table 8 sites should be regarded as 'Strategic Sites'. Gleeson and the HCA control Marchmont Farm which can be delivered as a sustainable urban extension. • Policy CS17 is objected to. The housing provision should allow for an element of net inward migration in this high demand, poor affordability area. • Policy CS18 is acceptable as long as it is interpreted flexibly. • A 35% affordable housing target under Policy CS19 is acceptable as long as viability through site assessments are the determining factors. 	<p>Core Strategy seeks to address, although there is still a need to provide for a mix of housing types, including family homes.</p> <p>Comment noted, no action required. Neither change to PPS3 is seen as having a significant impact on housing supply (see Housing Land Availability Assessment (July 2011)).</p> <p>Comments noted, no action required. Support for the identification of Marchmont Farm welcomed.</p> <p>Comment noted, no action required. See above earlier comments on inward migration. Comments noted, no action required. Both policies recognise the importance of flexibility.</p>
<p>ING Real Estate Investment Management:</p> <ul style="list-style-type: none"> • CS18 'Mix of Housing', Table 9 identifies high requirements for 2 and 3 bedroom units. When considering unit mix, ING urges the Council to consider the wider benefits a scheme may provide. Each planning application should be assessed on its individual merits. The viability of significant regeneration schemes and other development should not be compromised or prevented coming forward as a result of inflexible planning policy. • They welcome point (c) of Policy CS19 which recognises the need to assess the overall viability of a scheme and any abnormal costs when calculating 	<p>Comment noted, no action required. See earlier response to the application of size mix data from the SHMA.</p> <p>Comment noted, no action required. Support acknowledged.</p>

<p>affordable housing provision.</p> <p>Linden Homes (Chilterns) Ltd are concerned that the Council proposes to meet only natural growth levels. The annual rate of supply needs to be a minimum of 649 per year to meet household projection levels.</p> <p>The Crown Estate stresses that Dacorum needs to make clear in both the Core Strategy and Site Allocations DPD that there should be an element of flexibility as the plan period is 20 years and so will include a range of different market conditions.</p> <p>The Trustees of Piers Williams support Option 2 figures as a minimum rate of growth up to 2031 for the reason outlined below:</p> <ul style="list-style-type: none"> • The concern with Option 1 is that it may lead to development of smaller dwellings and apartments on smaller sites and results in less infrastructure being provided and more piecemeal planning of development. The option also relies on windfall sites and rural exception sites, contrary to National guidance, and does not provide a sound basis for planning for long term growth over the next 20 years. • Option 2 allows for modest extensions which would help meet local housing needs and also help meet gaps in local infrastructure. The basis for this level of growth is not clearly justified. However it will enable the Council to more adequately meet the housing needs of the Borough, including affordable needs 	<p>Comment noted, no action required. The Council has sought to balance social, economic and environmental factors when setting the housing target.</p> <p>Comment noted, no action required. Flexibility is built into the plan. The approach set out in the Core Strategy would allow the Council to add further local allocations if they so wished and if it was justified. These would be allocated through the Site Allocations DPD.</p> <p>Comment noted, no action required.</p> <p>Option 1 does provide opportunities for larger sites. These allow scope for larger and family sized accommodation, although not to the extent of Option 2. The target excludes an allowance for windfalls in years 0-10 in accordance with national advice. There is no reason why rural exception sites should not contribute to the overall housing supply.</p> <p>Comments noted no action required.</p>
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<p>which Option 1 would fail to achieve.</p> <p>The Trustees of Piers Williams generally support Option 2, options set out in the core strategy are not consistent with national policy and therefore they make the following recommendations:</p> <ul style="list-style-type: none"> • The housing options do not appear to be based on any clear or robust evidence base. The council does not appear to have considered how the above spatial distribution would respond to or impact on the ability to meet housing needs. • There can be no certainty that there will be 1,536 windfalls and 105 dwellings on rural exception sites coming forward. To provide flexibility for such sites not coming forward, the Council will need to identify an additional 4-5 years supply. • To better respond to housing needs and maintain a robust and flexible supply of housing land, in line with the above guidance, they recommend allocating further Greenfield sites to ensure the successful delivery of the core strategy. • The levels of growth proposed in the consultation document are unlikely to result in sufficient affordable housing being built between 2005 and 2031, on average only 99 affordable units were constructed per annum. • Option 1 is a continuation of those levels of growth, so is unlikely to result in anywhere near the level of affordable homes required, around 710 per annum (DBC Affordable Housing Strategy 05-07). The SHMA estimates that the requirement for social housing over the 2007-2021 period is around 220 per annum. • They recommend allocating sufficient large Greenfield sites to secure higher levels of affordable housing delivery. Larger Greenfield sites have the greatest potential to deliver affordable housing because they generally have the fewest constraints. <p>W Lamb Ltd considers the managed release mechanism set out in Policy CS17 is unwieldy and ineffective unless adequate supply is made at the outset. This is a legacy of the old 'plan, monitor and manage' process. It is fundamentally inappropriate for the Core Strategy to identify individual sites in Table 8 unless they are to form strategic allocations. It is not feasible for the Council to identify sites</p>	<p>Comments noted, no action required.</p> <p>Comments noted, no action required. The distribution of sites appropriately reflects the availability of land and local housing needs. See previous comments above on windfalls and flexibility. Refer to the Housing Land Availability Paper (July 2011) for details on measures the Council can put in place to ensure delivery.</p> <p>Comments noted, no action required. The level of affordable housing measured against the housing target is sufficient given the need to balance out a number of objectives.</p> <p>Comments noted, no action required.</p>
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when it has yet to determine the housing provision target. Table 8 should be deleted.

Those landowners who supported the approach made the following comments:

Barratt Strategic highlight the apparent disparity between Table 7 and the proposed housing programme set out in Policy CS17:

- The level of housing proposed under Option 2 falls short of the required level of housing even with nil-net migration. This would contradict with the assertion elsewhere in the plan that natural growth will be accommodated and the comment in Paragraph 15.14 that '*the best fit between economic and housing factors is at the natural growth level of housing (or higher)*'.
- Moreover, this general approach does not appear to take into account the anticipated growth in employment within Hemel and its role as a main economic centre.
- There are differences between the two sets of options identified in Table 7 and within Policy CS17.

- The figures expressed in Policy CS17 are to be considered as a minimum, the Council should then clearly justify the annual housing target identified. Policy CS17 should provide for the total housing figure, over the course of the whole plan period, rather than set an arbitrary lower annual housing requirement figure.
- The Core strategy does not clearly explain how windfall contribution relates to the housing target set out in CS17.
- Paragraph 15.23 states that windfalls have not been included in the first 10 years of the annual target for housing to accord with the guidance of PPS3 and a lower target has been set than required in order to meet the housing programme identified. This approach is not considered to be wholly in accordance with the spirit of PPS3 as it would seem that the Council do in fact rely on windfalls to provide the level of the housing required.
- The approach favoured would seem to be contrary to the advice set out in the Local Development Framework Monitoring: A Good Practice Guide (2005), which, in accordance with PPS3, advises Local Planning Authorities to identify an annual

Comment noted, no action required. See response to Question 6 with regard to amended employment targets.

Comments noted, no action required. The figures in Policy CS17 exclude windfalls in years 0-10 as advised in national guidance. Comments noted, no action required. This is a reasonable approach.

Comments noted, no action required. The Core Strategy already makes clear the role of windfalls in setting the housing target (para. 15.23). The housing programme does reflect their availability, but the housing supply measured against the target is not reliant on windfalls during this period.

Comment noted, no action required. This is a clear, logical and standard approach followed by many authorities, and should

<p>housing requirement figure - rather than an annual target - as part of their housing trajectory. This is an essential part of the plan, monitor and manage approach. The annual housing requirement figure identified should be sufficient to deliver the housing requirement set out in the plan i.e. the total identified in the housing strategy. In these terms, they would suggest the Council consider both their use of terminology and their approach to housing delivery.</p> <ul style="list-style-type: none"> • Clarification is sought on the figures in Table 7. It is unclear whether the figure for windfalls includes windfalls only for the later 15 years of the plan period, or whether this is an estimated figure for the whole plan period. Clarification is also sought on item (b) Defined locations in Hemel Hempstead and how this differs from item (a) Defined urban sites. • It is considered that further explanation and justification is required for why the 15% figure has been identified in Policy CS17. The figure signals that action should be taken to increase the supply of deliverable sites. • Policy CS19 should state that in the current economic conditions, a lower level of affordable housing may be acceptable where a clear viability case can be demonstrated. • The housing programme for Option 2 should at least meet the full housing requirement to support natural growth (i.e. nil migration), of 12,400 dwellings. • Further consideration should be given to the potential for providing further additional housing and not be reliant on windfalls during the later period of the Core Strategy. This reflects the anticipated economic growth over the planned period and that there are identified sites that could accommodate further growth. • The clarifications on the land supply to Table 7 should be inserted into the supporting text. 	<p>be retained. Progress against achieving the target can reasonably be pursued through the AMR process.</p> <p>Comments noted, no action required. Please refer for further detail to the Housing Land Availability Paper 2011. The Paper explains the role of defined sites and locations and the role of windfalls.</p> <p>Comments noted, no action required. This is considered to be a reasonable level to signal when intervention should take place, and the approach has been adopted by other authorities.</p> <p>Comments noted, no action required. This is implicit in the policy. If there are viability issues, for whatever reasons, then the policy would allow for flexibility. Comments noted, no action required. See comments above on housing target.</p> <p>Comments noted, no action required.</p>
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<ul style="list-style-type: none"> • Policy CS19 should be amended to state that a lower level of affordable housing may be acceptable where 35% would not be viable, and should be judged on a case by case basis. <p>Grand Union Investments argue that the Strategic Sites and Local Allocations as identified within Table 8 are not based on a robust evidence base because their locations are considered not to properly consider locally generated housing needs based on natural population (and household) growth at each settlement and other national planning-related criteria. In particular, Berkhamsted, as an important market town, should accommodate strategic development.</p> <p>Grand Union Investments believe that in order for the draft Plan to be justified, effective and consistent with national policy, the following recommendations are suggested to Policy SC17:</p> <ul style="list-style-type: none"> • Deletion of the Options 1 and 2 Housing Target Options (until such time as Dacorum have evidence to support their assumptions). • That draft policy indicates that housing growth options more generally should provide a sufficient level of future housing to accommodate at least the needs of local natural population (and household) growth across the borough and in the plan period. • Inclusion of land to the south of Berkhamsted as a 'Strategic Site' and 'Local Allocation' within draft Table 8, which is also acknowledged within Chapter 22 relating to Berkhamsted Place Strategy. <p>Zog Brownfield Ventures Limited wants future policy to encourage rather than restrain residential development and must fully appreciate the individual circumstances of the site and development. Affordable housing policy must be applied flexibility in terms of the overall affordable requirement and how this provided within the development and/or off-site.</p>	<p>Comments noted, no action required. See earlier similar comments on viability.</p> <p>Comments noted, no action required.</p> <p>Comment noted, no action required. The Council believes the Core Strategy strikes a reasonable balance between the careful control over development and a degree of flexibility where circumstances justify this.</p>
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Meeting Community Needs

QUESTION 11

Do you support the approach to 'Meeting Community Needs' set out in Section 16?			
Responses received	56		
Yes -			
Key organisations	8	No clear answer:	
Individuals	10	Key organisations	2
Landowners	4	Individuals	1
Total	22 responses	Landowners	0
		Total	3
No -			
Key organisations	8		
Individuals	21		
Landowners	2		
Total	31 responses		
Response	Actions		
<p>Organisations</p> <p><i>Organisations who have disagreed made the following comments</i></p> <p>Hertfordshire Police Authority - Policing Services should be listed in Figure 14 as a form of social infrastructure in accordance with the provisions of PPS12 and the Hertfordshire Infrastructure and Investment Strategy. The Monitoring Section of the chapter needs to be up-dated to include the following indicator: Additional policing facilities delivered in growth areas'. Police Infrastructure should be identified as being needed to support development.</p> <p>Tring Sports Forum - The evidence base supporting sporting facilities is criticised, since it does not acknowledge a shortage of sport and leisure facilities in Tring</p> <p>New Gospel Hall Trust and Jehovah's Witnesses - It is not</p>	<p>Comment noted. Figure 14 is not intended to be a definitive list. Police infrastructure is already covered under the reference to emergency services. The Council will continue to discuss Police requirements for the update to the Infrastructure Delivery Plan (IDP).</p> <p>Current technical information is considered adequate for Core Strategy purposes. However, the Council will consider whether to update the Outdoor Sports Facilities Study to support subsequent planning documents.</p> <p>Comment noted. The</p>		

<p>acceptable to have a multi-faith centre. Sufficient D1-h space must be provided for <u>ALL</u> faith groups as they expand in the borough.</p> <p>New Conservation Society - Limiting the specification of the space for performing arts to multi-purpose (16.22) could limit the space to small low key performers. Planning constraints on schools in the Green Belt should be no less robust than those for housing.</p> <p>Sport England - Add the word "satisfactory" before "evidence in penultimate paragraph of policy CS23.</p> <p>Hertfordshire County Council: The reference at 16.7 to a single new document being published later this year to deal with issues around school place planning is not entirely correct.</p> <p>It is considered that it would be helpful if the reference to Hemel Hempstead Town Centre regeneration could make explicit reference to the aspiration for the replacement of Hemel Hempstead Library</p> <p>Section 16 should refer to the fact that the Fire and Rescue service has a statutory duty to ensure that all development has adequate hydrants and if necessary fire cover, especially development more than 10 mins away from the fire station.</p> <p>The Adult Care Service identifies the requirement to meet a range of needs of 654 units in the form of social rented/public accommodation and 517 privately financed accommodation for older people.</p>	<p>Core Strategy already recognises the need to promote a variety of cultural facilities (paragraph 16.22). Sites for D1-h space can be considered as part of the Site Allocations DPD.</p> <p>The provision for a performing arts venue will be considered further through the Town Centre Master Plan. The Council must respond to identified needs for schools and take account of Government policy. Unnecessary impact on the Green Belt should be avoided. Amend Policy CS23 to explain where new schools will be appropriate.</p> <p>Amend text to reflect comment.</p> <p>Amend text to reflect latest available information from Hertfordshire County Council.</p> <p>Amend text to include reference to the provision of a new library.</p> <p>Amend text to include brief reference to provision of fire hydrants.</p> <p>Further information has been required from ACS. New text has been added to reflect their</p>
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<p>Adult Care Services would support any flexicare schemes across the district. Demographics suggest that there will be demand for more residential and nursing services in the private sector but the preference is for land to be used for flexicare housing (self-contained apartments with space for scheme managers) above care homes. There is a need for the following flexicare schemes: two more in Hemel, one in Berkhamsted, and one in Tring. The proposed site should be near shops and other local amenities; the surrounding area should be relatively flat and navigable for older people; and good transport links must be available nearby.</p> <p>Small scale Learning disability accommodation is also required. This should be like other housing in the area and non institutional in appearance. Small developments are required (6-12 units) so they are part of the community. One and two bedroom apartments (to enable carers to stay) are preferred. Most demand is in Hemel Hempstead, but also in Berkhamsted and Tring. Located in places with good transport links, local shops and other amenities accessible.</p> <p>Prevention of isolation is important, and this can be achieved by engagement in local activities and opportunities. Sometimes provision of communal facilities on site will facilitate this.</p> <p><i>Organisations who have agreed made the following comments</i></p> <p>Natural History Museum, Friends of the Earth, The Theatres Trust and Tring Town Council – no comments made.</p> <p>Berkhamsted Town Council - in zoning this land for a first school, consideration should be given to replacing Ashlyn's playing fields . As suggested in other submissions (e.g by Ashlyns School) the land abutting Thomas Coram School to the east of Swing Gate School should be zoned for community use- playing fields or similar.</p> <p>Markyate Parish Council – Yes, but more detail required in the Place Strategy.</p>	<p>advice.</p> <p>See above.</p> <p>Support welcomed.</p> <p>Consideration has been given to both of these uses and it is considered that the site would be more appropriate for a primary school. The Site Allocations DPD will consider additional sites for leisure purposes.</p> <p>The detail given in the Emerging Core Strategy remains valid. However, it is only practicable that a summary version is incorporated into the final document.</p>
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<p>Nettleden with Potten End Parish Council - School provision should be within existing settlements <u>not</u> on Green Belt or open land. The reuse of existing community buildings for community needs should be paramount.</p> <p><i>Other comments from organisations</i></p> <p>NHS Trust - Paragraph 16.11 should be amended to refer to changes specifically at Hemel Hempstead hospital.</p> <p>Three Rivers District Council - Policy CS23 should have links to the Infrastructure Delivery Plan and the Planning Obligations SPD to ensure that priorities for infrastructure provision are met through development.</p> <p>Individuals</p> <p><i>Individuals who have disagreed made the following comments</i></p> <p>Where is our new Pavilion?</p> <p>We should be planning for a new hospital.</p> <p>Existing services should be improved to meet current demand, before considering more housing.</p> <p>Do not agree with Policy CS23, where it states that schools</p>	<p>See response to the New Conservation Society on new schools in the Green Belt. Policy CS23 supports the re-use of community buildings for community needs.</p> <p>Amend text to update references to Hemel Hempstead hospital.</p> <p>No change required. These documents are already listed under the delivery section that follows Policy CS23.</p> <p>Comment noted. This will be considered further through the Town Centre Masterplan.</p> <p>Comment noted. Hospital provision is the responsibility of the Health Authority not the Local Authority.</p> <p>Comment noted. No further action. Improvements can only be facilitated through service maintenance or contributions received from further development. See Sections 28 (Delivery) and 29 (Infrastructure)</p> <p>Amend text in Policy CS23 to have regard for</p>
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<p>can be built on open space or Green Belt land.</p> <p>Sufficient D1-h space must be provided for <u>ALL</u> faith groups as they expand in the borough.</p> <p>There has been no input from the Dacorum Sports Network (DSN) into this document.</p> <p>The Open Space Study dated 2008 is based on an audit of each site taken in July and September 2004. The relevance of the audit information relative to sport has to be redone and taking into account NGB standards and competitive structures to make the basis of the Open Space Study reliable for this Core Strategy.</p> <p>The Facilities Improvement Strategy 2010 does not exist yet on the DBC website and hence it is impossible to know what conclusions it has and whether they are meaningful for sport.</p> <p>There is nothing in this document that ensures that sustainable communities are delivered. Land should be allocated within walking distance of new development to grow sufficient food for these dwellings.</p>	<p>other more suitable sites, need and environmental impact before developing a school in the Green Belt. Since schools are already developed on land identified as Open Land no further action is relevant.</p> <p>See response to New Gospel Hall Trust above.</p> <p>The Dacorum Network has been consulted as part of the Facilities Improvement Strategy and they have had opportunities to comment in previous public consultation.</p> <p>See response to Tring Sports Forum above.</p> <p>This will be published on the Council's website once complete and relevant amendments will be made to the Core Strategy if necessary. Recommendations are expected to be more relevant to the Site Allocations DPD.</p> <p>The Site Allocations DPD can allocate land for allotment purposes. Policy CS1 relates to distribution of development and CS2 to the selection of development sites. The policies will help ensure the delivery of development in the right</p>
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<p>Reference should be made to the need to work with West Herts College in planning for further education, access to buildings of historic interest, and the paragraph on the regeneration of Hemel Hempstead should include cultural provision of a museum.</p> <p>I do not think ALL development should be expected to contribute towards the provision of social infrastructure.</p> <p>In no event should school sites be released for housing.</p> <p>The council should be facilitating adequate provision of life long learning and also ensuring that there is adequate public transport to nearby universities. Policy CS8 sets out the approach to sustainable transport. The local authority cannot control precise bus routes. Policy CC14 includes specific support for skills initiatives.</p> <p>Additional community playing fields should be identified if the land identified at Ashlyns is used for the delivery of a new primary school.</p>	<p>places.</p> <p>Comments noted. No further action. There is ongoing collaboration with the college. Access cannot be considered to all buildings of historic interest i.e. those in private ownership. The need for a town museum will be considered through the Town Centre Master Plan.</p> <p>The approach to developer contributions in Policy CS35 accords with national policy. This states that any net new development should make contributions to infrastructure upon which it will have a direct impact.</p> <p>Comment noted. No further action. Policy CS23 seeks to ensure the protection of existing social infrastructure. The Council is working in partnership with Herts County Council to ensure that the closed school sites deliver the right social and community needs for their local areas.</p> <p>Comment noted. No further action.</p> <p>This will be considered further through the Site Allocations DPD.</p>
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<p><i>Individuals who have agreed made the following comments</i></p> <p>There is also demand for middle and high schools.</p> <p><i>Other comments from individuals</i></p> <p>I am concerned that it will not be economically viable to provide adequate access to services and facilities to new neighbourhoods outside the existing residential areas.</p> <p>Landowners</p> <p><i>Landowners who have disagreed made the following comments</i></p> <p>Akzo Nobel Pension Scheme - This approach should be flexible and relate in scale and kind to the proposed development, and be based on-up-to-date assessments of need, supply and demand.</p> <p>The Crown Estate - Policy CS23 should have links to the</p>	<p>Comment noted. The Council is working in partnership with Herts County Council regarding the provision of all schooling needs and the Core Strategy will be amended to reflect the most up to date advice.</p> <p>Comment noted. No further action. New neighbourhoods or small-scale extensions to neighbourhoods will be linked into existing highways and green corridors wherever is feasible. Policy CS8 will help ensure appropriate transport links are in place and Policy CS35 will ensure the provision of appropriate infrastructure and developer contributions.</p> <p>Comment noted. No further action. The Council's approach to the provision of social infrastructure accords with national policy. This states that any net new development should make contributions to infrastructure with which it will have a direct impact. (See Policy CS35 – Infrastructure and Developer Contributions).</p> <p>No action required.</p>
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<p>Infrastructure Delivery Plan and the Planning Obligations SPD to ensure that priorities for infrastructure provision are met through development.</p> <p><i>Landowners who have agreed made the following comments</i></p> <p>Taylor Wimpey UK Ltd, Gleeson Strategic Land and Grand Union Investments – No comment</p> <p>Barratt Strategic - requirement for new or improved facilities in relation to new housing should be relative to the new development proposed.</p> <p><i>Other comments from Landowners</i></p> <p>None</p>	<p>Paragraph 16.3 already refers to the Infrastructure Delivery Plan and both documents are listed as delivery mechanisms for Policy CS23.</p> <p>Answers noted.</p> <p>See response to Akzo Nobel above.</p>
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Enhancing the Natural Environment

QUESTION 12

Do you support the approach to 'Enhancing the Natural Environment' set out in Section 17?

Responses received 50

Yes - Key organisations 8
 Individuals 21
 Landowners 4

Total 33 responses

No clear answer:

Key organisations 0
 Individuals 0
 Landowners 0

Total 0

No - Key organisations 3
 Individuals 13
 Landowners 1

Total 17 responses

Response

Actions

Organisations

Organisations who disagreed made the following comments:

Hertfordshire Biological Records Centre:

- Supports the overall approach to enhancing the natural environment, in particular the encouragement of agri-environment schemes.
- However, feels that support for traditional land management practices that secure and enhance environmental assets should be included as a strategic objective.
- Include development of a local food economy which can help sustain farming practices that maintain the countryside within the delivery section. Reference should be made to supporting farmers markets and farm shops – either here or within the economy section.

Chilterns Conservation Board –

- The recognition given to the Chilterns AONB and its management Plan in paras 17.2 and 17.3 is welcomed.
- Text of Policy CS25 should be reworded by the addition of 'and its setting' and 'Natural Beauty' in line 1 and the addition of 'and where possible, enhanced' after

No action is required in response to most comments from organisations, individuals and landowners.

Many comments are supportive.

The Core Strategy policies provide a framework. Some policies from the Local Plan are saved – for example on wildlife/nature conservation sites and Open Land: both are protected – ref Policies CS4 and CS26 (and para 17.14) for the framework.

Points of detail are better dealt with in supplementary or subordinate documents.

The Landscape Character Assessment for Dacorum either

<p>conserved.’ The reference in the policy text to the need to have regard to the management Plan, Chilterns Buildings Design Guide and Technical Notes is welcomed and particularly supported.</p> <ul style="list-style-type: none"> • Welcomes the fact that the delivery of Policy CS24 will be achieved through adherence to the Chilterns Buildings Design Guide, implementation of the Management Plan and through partnership working involving the Board and others. • The first environmental strategic objective should refer to the need to conserve the distinctive landscape and be amended to read ‘To conserve and enhance Dacorum’s distinct landscape character, open spaces, biological and geological diversity and historic environment.’ <p>Hertfordshire County Council -</p> <ul style="list-style-type: none"> • Welcomes paragraphs 17.6 and 17.7 • The County’s Historic Environment Unit would like to continue discussions with the Borough Council on the development of historic landscape characterisation as a tool for informing sustainable development. It is suggested that this could be produced as a Supplementary Planning Document. <p><i>Organisations who agreed made the following comments:</i></p> <p>Friends of the Earth:</p> <ul style="list-style-type: none"> • Strongly support the objectives. <p>Berkhamsted Town Council:</p> <ul style="list-style-type: none"> • Wildlife corridors should extend into urban areas. <p>Natural England –</p> <ul style="list-style-type: none"> • Particularly pleased that the benefits of using wildlife corridors to link habitats and the dangers of habitat fragmentation have been stressed. • Suggest it would be appropriate to mention sustainable drainage systems and other biodiversity enhancing measures such as green and brown roofs in this section, which can also be defined as green infrastructure whilst at the same time creating routes for wildlife. • European designations and local wildlife sites should also be specifically mentioned in terms of protection and enhancement, not only in terms of green infrastructure. Suggest that a line stipulating that development will not 	<p>recommends conservation or improvement of the landscape. It underpins Policy CS25. The Historic Landscape Characterisation provides important evidence, but is not a policy document in itself.</p> <p>Comments relating to strategic objectives are responded to under Question 2.</p> <p>It is noted that green infrastructure can include sustainable drainage systems, green roofs and urban wildlife sites. Habitats and biodiversity corridors are covered by Policy CS26. Key wildlife corridors are shown in settlement vision diagrams. Biodiversity links with sustainable building design and urban design policies (ref Chapters 11 and 19).</p> <p>Chapter 17 includes a section on protecting and improving the landscape.</p> <p>Sustainable design and construction and the sensible use and management of resources (including water) is covered in Chapter 19.</p> <p>The Countryside Strategy includes reference to local food production and good land management.</p> <p>A number of comments seek particular protection from building.</p>
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<p>be allowed on SSSIs or Local Wildlife Sites and that European and local designations will be protected and enhanced should be added to the text.</p> <ul style="list-style-type: none"> • Landscape should have a heading of its own within the section and contain definitions of landscape character and visual amenity and a section on the policies and guidance relating to landscape and how this is assessed. <p>Markyate Parish Council –</p> <ul style="list-style-type: none"> • Clarification required by what is meant by ‘an area of biodiversity opportunity.’ • Question why Cheverells Green is included but other areas such as Beechwood Park are not. <p>Nettleden with Potten End Parish Council –</p> <ul style="list-style-type: none"> • More care is required with siting development along all ridges. Nettleden and Ashridge have suffered from intrusive skyline development in the past. <p>Individuals</p> <p><i>Individuals who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • Concerned that building in the Green Belt and other designated land cannot be considered as enhancing the natural environment. • Agree with objectives but disagree with development within the Green Belt. • Proposals for Green Belt development at Marchmont farm are contrary to Policy CS25. • The countryside is under pressure to provide food whilst supporting a healthy biodiversity. It should therefore be protected from housing development. • Garden land needs to be protected from development. • Agree with broad principles set out but more needs to be done to enhance the character of the local area. • There should be no new development in the Chilterns Area of Outstanding Natural Beauty (AONB). • Any development in the Chilterns AONB should be underground. • Policy CS24 is too permissive regarding development within the Chilterns AONB. There are other attributes of the AONB that need to be protected in addition to its 	<p>The Chapter largely promotes environmental protection – e.g. important landscape, habitats or other assets – and improvements and enhancements. Green Belt policy can help support this approach. However its aim (and that of other policies, e.g. Policy CS24 for the Chilterns AONB) is not to prevent all development.</p> <p>Some changes have been made;</p> <ul style="list-style-type: none"> • to provide a definition of areas of biodiversity opportunity (Map 3); • to add support for measures to develop sound food and woodland economies; and • to refer to the importance of water management and the restoration of flows in chalk streams (para 17.19).
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skyline, i.e. valley floors, fields and forests and its overall tranquillity.

- There needs to be more text relating to the strategic objective of promoting the use of renewable resources. This should include the requirement that all new Council buildings have to be fitted with solar / wind power technology; all new homes and premises should have underground electricity supplies and any development above 5 units should require a wind powered generator to be installed.
- There is much that is good in the approach, but key issues have been overlooked, i.e. reference to groundwater levels in the Gade and Bulbourne falling due to abstraction and this problem will increase with new housing development. A significant paragraph about maintaining water levels should be included.
- The Bulbourne wetlands (at Northchurch) are not mentioned.

Individuals who agreed made the following comments:

- Support approach if it doesn't mean new homes, but improves provision of more paths for walkers and horse riders.
- Support all efforts to preserve and enhance the natural environment. However, para 17.2 requires real commitment to prevent further erosion of character.
- It is not clear what the term 'designated Open Land' refers to. This is not shown on the maps.
- Wildlife corridors should be extended into urban areas and new development should not disrupt these corridors.
- A good section with good policies on Green Infrastructure and Biodiversity.
- The slopes of all valleys should be protected.
- There is a lack of linkage between the text on Landscape Character Assessment and Green Infrastructure proposals. The Landscape Character Assessments contain a wealth of information on how to improve and restore character: this information needs to be picked up when developing Green Infrastructure proposals.

Landowners

Landowners who agreed made the following comments:

Barratt Strategic –

- Generally supportive of the approach indentified. However, would like clarification of the Areas of Biodiversity Opportunity on Map 3 as these are not referred to in the supporting text. The meaning and implications of this designation should be clearly set out.

Conserving the Historic Environment

QUESTION 13

Do you support the approach to 'Conserving the Historic Environment' set out in Section 18?	
Responses received	45
Yes - Key organisations	10
Individuals	26
Landowners	4
Total	40 responses
No clear answer:	
Key organisations	0
Individuals	0
Landowners	2
Total	2
No - Key organisations	1
Individuals	2
Landowners	0
Total	3 responses
Response	Actions
<p>Organisations</p> <p><i>Organisations who have disagreed made the following comments</i></p> <ul style="list-style-type: none"> Herts County Council – Wording in paragraph 18.1 should be changed. The borough's historic environment is diverse and includes 25 Conservation Areas that cover the Old Town of Hemel Hempstead, historic market towns, villages and hamlets. It also includes national and local designations and undesignated heritage assets. National designations comprise Listed Buildings, Scheduled Ancient Monuments and Registered Parks and Gardens. Local designations comprise locally listed buildings and other heritage assets. Undesignated heritage assets include historic buildings, historic village and townscapes known archaeological sites and areas of potential archaeological interest". <p><i>Organisations who have agreed made the following comments</i></p> <ul style="list-style-type: none"> Berkhamsted Town Council, Tring Town Council, Nettleden with Potten End Parish Council, Bovington Parish Council and Tring Rural Parish Council – No comments. 	<p>The principles contained in the suggestion are broadly accepted. Amendments to the text have taken them into account. Landscape, undesignated parks and gardens and areas of archaeological significance also need to be referred to.</p> <p>Answers noted.</p>

<ul style="list-style-type: none"> • Chiltern Conservation Board – The Board welcomes and supports CS27. • Friends of the Earth - Renewable installations if carefully planned could enhance historic buildings i.e. solar lighting. Please involve us in any future consultations. • Natural History Museum - We welcome involvement in the process of developing the subsequent SPD on Conservation Areas. • Markyate Parish Council - we would like to see more control of works to the interiors of listed buildings. It is important the features in Markyate High Street such as arches and yards are maintained. • Jehovah’s Witnesses - Item 18:4 refers to retaining buildings / use classes - we support this strongly - but we do see a constant erosion of D1 facilities. • Hertfordshire Gardens Trust - 18.1 Many historic parks and gardens in Dacorum are undesignated and it is important that their significance is noted together with the locally listed buildings, historic buildings and historic townscapes. 	<p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Comments noted for Markyate Conservation Area appraisal. Guidance that may affect the interior of listed buildings and conservation areas will be dealt with in a supplementary planning document or LDD.</p> <p>Comment noted. Policy CS23 seeks to control the loss of community facilities.</p> <p>Amend text to include undesignated parks and gardens.</p>
<p><i>Other comments from Organisations</i></p> <ul style="list-style-type: none"> • None 	
<p>Individuals</p>	
<p><i>Individuals who have disagreed made the following comments</i></p>	
<ul style="list-style-type: none"> • Half of the information is missing so I cannot support this. 	<p>Comment noted. It is not clear what information is being referred to.</p>
<ul style="list-style-type: none"> • There is no reference to public access. 	<p>Comment noted. No change. Land and buildings may or may</p>

<ul style="list-style-type: none"> • So long as developments do not ruin the views. <p><i>Individuals who have agreed made the following comments</i></p> <ul style="list-style-type: none"> • There is no statement about how often each conservation area should be appraised. • One of these historic assets is up for sale and it should be the duty of the Council to purchase it to protect and conserve it and to allow public access. • Preservation of these heritage assets, which Dacorum states is of great importance, has ramifications surrounding the proposals to build extra housing in Hemel Hempstead under Option 2. I believe Option 2 should therefore be resisted and have commented on this in greater detail in the relevant section. • More should be made of the area's heritageperhaps with more educational use and resources for local schools. 	<p>not be publicly owned. Unrestricted access cannot be achieved. The Council will aim to ensure that heritage assets are at least publicly recorded. The supplementary planning document for the Historic Environment may be able to provide further detail on this matter.</p> <p>Comment noted. This is a design principle in Policy CS10.</p> <p>Comment noted. There is no set review date. Monitoring will appraise the effectiveness of policies. Further consideration about review will be given once the programme of conservation area appraisals is complete.</p> <p>Comment noted. The purchase of a historic asset is not a planning issue. The Council however would wish to see any asset properly looked after.</p> <p>The layout and design of any development proposal would be assessed against Policy CS27. There are no known heritage assets which would prevent any of the local allocations from coming forward.</p> <p>Refer to heritage being an educational resource within the text.</p>
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Landowners

Other comments from Landowners

- Grand Union Investments – no comment
- Barratt Strategic - Suggest policy wording is as follows:

‘Development within Conservation Areas will be supported where it will conserve the character and appearance of the Conservation Area and particularly where it will remove, replace or enhance existing features which do not make a positive contribution to a Conservation Area’.

In relation to archaeology, we would suggest:

‘ Archaeological potential of development sites should be considered and where identified, features of archaeological interest should be surveyed, recorded and, where possible, protected in situ’.

The principles contained in this suggestion are broadly accepted. Amendments to the policy have taken them into account. Features of archaeological interest include artefacts as well as sites.

Using Resources Efficiently

QUESTION 14

Do you support the approach to 'Using Resources Efficiently' set out in Section 19?	
Responses received	51
Yes -	
Key organisations	9
Individuals	14
Landowners	1
Total	24 responses
No clear answer:	
Key organisations	0
Individuals	5
Landowners	1
Total	6
No -	
Key organisations	8
Individuals	8
Landowners	6
Total	22 responses
Response	Actions
<p>Organisations</p> <p><i>Organisations who have disagreed made the following comments</i></p> <p>Sainsburys – Policy CS29 is too prescriptive and could affect the viability of some developments.</p> <p>Chiltern Conservation Board - The Board would welcome being closely involved in the production of the District Heating Opportunities Areas and Wind Opportunity Areas SPD. There should also be reference to those areas that have suffered a loss of tranquillity.</p> <p>Chipperfield Parish Council – Map 4 showing the Dacorum Energy Opportunities Plan is on too small a scale to be of value. Redraft differentiating between Grade 3 & 4 farm land, Green Belt and the area thought to be suitable for wind farms. Redraft the Low and Zero Carbon Study to differentiate between Grade 3 & 4 farm land, Green Belt and the area thought to be suitable for wind farms.</p>	<p>The policy has a caveat relating to the viability of a development. No further action.</p> <p>Comment noted regarding involvement in the SPD. The issue of tranquillity is already highlighted in paragraph 27.18 of the Countryside Place Strategy. See response to Chilterns Conservation Board comments on Policy CS25.</p> <p>Further work will be undertaken for the more detailed Supplementary Planning Guidance. No further action.</p>

<p>Nettleden with Potten End Parish Council - Wind turbines are shown to be appropriate in the AONB. This is completely unacceptable.</p> <p>Hertfordshire County Council (Property Services) - There is no reference to Hertfordshire County Council as a Waste Disposal Authority.</p> <ul style="list-style-type: none"> (a) there is no reference to Waste; (b) the fact that an In Vessel Composting facility may be required in the west of the County; (c) the fact that there is a requirement for a relocation or enlarged HWRC to serve Hemel Hempstead; (d) Municipal Solid Waste may not be available in association with any CHP scheme; and (e) The Local Planning Authority can assist in putting in place planning policies that assist facilitating provision of appropriate sites for dealing with waste. <p><i>Organisations who have agreed made the following comments</i></p>	<p>See above.</p> <p>Amend para 19.37 and 19.38 to reflect points (a) and (c) and refer to the role of the County Council regarding waste issues.</p>
<p>Tring Rural Parish Council - The development of wind turbines in the rural area should be considered on a site by site basis because of its contentious nature.</p> <p>Thames Water – We support Policy CS31, however some types of development (such as those identified as 'Less Vulnerable' and 'Water Compatible') may be appropriate within Flood Zone 3.</p>	<p>See response to Chipperfield Parish Council above.</p> <p>Support welcomed. Amend Policy CS31 to refer to the (possible) acceptance of compatible development in Flood Zone 3.</p>
<p>Hertfordshire County Council (Environment Department)– No comments</p>	<p>Answer noted.</p>
<p>Berkhamsted Town Council - The constraints of the AONB should be added to those of the Green Belt.</p>	<p>Comment noted. No further action. AONB and Green Belt are designated for different reasons. Policy CS5 relates to the Green Belt and Policy CS24 to the AONB.</p>
<p>Tring Sports Forum - Dacorum BC could make a significant ecological improvement to Sustainable Resource and Waste Management by offering recycling collections to non-profit making organisations such as sports clubs in the same way these services are provided to domestic householders in the borough.</p>	<p>Comment noted. This is a more detailed issue for the Waste Disposal Authority at Herts County Council. Recycling is covered in</p>

<p>Markyate Parish Council - It looks as if land to the south of Markyate is designated suitable for wind turbines. Our survey had two thirds of households supporting a Parish Council lead on renewable energy. We would propose a study be made with a view to using wind or solar power in some way at or near the Village Hall, which is in an exposed area at the top of Cavendish Road.</p> <p>Tring Town Council and Bovingdon Parish Council – No comments.</p> <p>Friends of the Earth – strongly support the tree planting scheme because of the benefits mentioned.</p> <p>Individuals</p> <p><i>Individuals who have disagreed made the following comments</i></p> <p>There is nowhere near enough information here to convince me that we will meet the targets.</p> <p>Improve existing infrastructure to cope with current demand before considering new development.</p> <p>I would prefer to name this section "Using resources</p>	<p>sections 19.27 and Policy CS29.</p> <p>See response to Chipperfield Parish Council above.</p> <p>Answers noted.</p> <p>Support welcomed.</p> <p>Comment noted. Delivery will be supported through a number of different mechanisms listed under Policies CS29 and CS30. The approach set out in the Core Strategy is based on more detailed technical evidence. Further guidance will also be provided in a Supplementary Planning Document. No further action required.</p> <p>See response to Question 32 (Infrastructure) and Question 31 (Delivery). New development can only request contributions associated with the new infrastructure needs, rather than seeking to remedy existing deficits.</p> <p>The title of the section is</p>
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<p>sustainably", efficiency is relative but sustainability is much easier to define and monitor. The 'How have we got to this point may have a typo – the first sentence should probably include the word limiting. There should also be much more renewable energy generation planned. In addition, the supply of drinking water should be fixed to an amount per person per year.</p>	<p>considered to reflect its content and intentions appropriately. No change required. The level of renewable energy generation is primarily determined by the open market and Government incentives. The focus of the Core Strategy is on achieving energy efficiencies by ensuring that buildings are built to a higher standard with better insulation. Policy CS29 seeks to limit the amount of potable water consumed in new development per person per day.</p>
<p>Deliver fewer houses to achieve carbon reductions.</p>	<p>Decisions on housing targets need to reflect economic and social as well as environmental considerations. No further action.</p>
<p>I strongly oppose the development of onshore wind turbines as it would be detrimental to the rural character and tranquillity of much of the borough, including views into and within the Chilterns AONB.</p>	<p>See response to Chipperfield Parish Council above.</p>
<p>Paragraphs 19.28 to 19.34 should include measures to reduce water demand by requiring the use in new buildings, and by encouraging retrofitting in existing buildings, of water efficient fittings and water meters and encouraging other measures. And be more stringent with paving of front gardens.</p>	<p>Amend para 19.28 to reflect the need to deliver water efficiencies in both new and existing development. Detailed design guidance for front gardens is not a Core Strategy issue. This will be covered in a subsequent Supplementary Planning Document.</p>
<p>Wind turbines are shown to be appropriate in the AONB. This is completely unacceptable.</p>	<p>The map shows that they could be considered in these</p>

<p><i>Individuals who have agreed made the following comments</i></p> <p>CS30 could include an option for retrofitting water efficiency measures as less water will be heated.</p> <p>It is important to maintain energy/water efficiency and renewable technologies for future use. I am not sure whether the Core Strategy should cover the maintenance of facilities. It is one thing to use resources effectively, but keeping facilities up to a standard means a commitment to maintaining the standard.</p> <p>Deliver fewer houses to achieve carbon reductions</p> <p>Wind turbines cannot be relied on for base-load energy generation.</p> <p>The Council should deliver renewable energy but not in listed buildings.</p> <p>Paragraph 19.32 lists 'recharging the aquifer' and 'restoration of river flows' as items for investigation, yet when it comes to policies there is virtually nothing about these issues. They are both so important that a policy must be there to cover them in detail. If they are ignored then many other aims and objectives throughout the plan as a whole (particularly in relation to the environment) will fail to be met. The role and perhaps obligations of the local water company seem to be absent in this document.</p>	<p>areas because of the level of wind speed, not that they are appropriate. No further action.</p> <p>Amend Policy CS30 to include water efficiency measures for existing development.</p> <p>It is envisaged that future maintenance of technologies in public buildings will be maintained by the Council or service provider. Private buildings will be responsible for their own maintenance arrangements.</p> <p>Decisions on housing targets need to reflect social and economic as well as environmental considerations. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. This would only be allowed if it did not harm the character of the area, in accordance with national and local policies.</p> <p>Policy CS31 supports measures to restore natural flows in the rivers and water environment. Examples in the policy have been removed and included in the background text, particularly in the context of sustainable drainage</p>
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<p>We would urge the adoption of water neutrality, which aims to keep water demand constant even as growth occurs.</p> <p><i>Other comments from Individuals</i></p> <p>I very much do support the objectives but believe that the plans you are proposing for the Shootersway development will place existing infrastructure under strain.</p> <p>What a lot of bureaucracy.</p> <p>This section may be misguided in its suggestion that carbon reduction is a worthwhile end in itself, but this makes no difference to the fundamental need to conserve energy and resources for future generations.</p> <p>Landowners</p> <p><i>Landowners who have disagreed made the following comments</i></p> <p>ING - considers that development should not be compromised or prevented coming forward if a planned district-wide heating and cooling network is not in place. Also Policy CS28 'Carbons Emissions Reductions' states a minimum of 75% carbon emissions reduction would be expected from all new developments. ING considers this target to be too high and unachievable.</p> <p>Aviva Investors - The targets identified in Table 11 are considered to be economically unsustainable given the achievable rents in the Maylands Business Park. The targets should be more flexible to avoid placing financial burdens on new development.</p>	<p>systems. Work will continue with the appropriate agencies to improve the water environment.</p> <p>Comment noted. Whilst the principle is supported, delivering this goal is outside the realm of the Core Strategy. It would require a separate detailed strategy for existing development. The focus of the Core Strategy is upon new development.</p> <p>Comment noted. No further action. See response to Questions 18 and 22.</p> <p>Comment noted.</p> <p>Comment noted. No further action.</p> <p>See response to Chipperfield Parish Council above.</p> <p>The targets are not significantly above building regulations, except for large scale development in areas of higher density. They are considered to be</p>
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<p>Akzo Nobel Pension Scheme – We are concerned that a 75% improvement is too high and seek clarification as to how the Council will assess how this has been met and how the Carbon Offset Fund will operate.</p>	<p>reasonable and viable. No further action.</p> <p>The level of energy efficiencies will follow the revised Table 11. The 75% minimum for carbon emission reductions in all new development has been removed. Further guidance will follow on how the Carbon (Sustainability) Offset Fund will be developed and operated.</p>
<p>Wm Morrison Supermarkets plc - Policy CS28: Were the LPA to choose to maintain working on the Sustainable Code for Housing levels, it is considered that the reference should be made to the Building Regulations 2006. Policy CS29: The first sentence should be amended to change 'will' to 'should'. Policy CS30: More detail should be provided either within this policy or in a separate SPD, which sets out clear guidance on how funds will be spent by the carbon offset fund.</p>	<p>Amend Table 11 to refer to Building Regulations 2010. Sufficient flexibility is already built into the policies. No further action. Further guidance will follow on the workings of the Carbon (Sustainability) Offset Fund will be developed and operated. Amend Policy CS30 to subsequent policy advice.</p>
<p>Royal Mail - Policy CS28 should include reference to: "targets which will be sought subject to the assessment of technical feasibility and viability in utilising renewables, reducing CO2 and securing energy savings in development proposals". There should be an expectation for new development to provide its own or link into existing decentralised energy plant such as CHP. We request that flexibility is built into the Policy CS28 and CS29. CS29 should include "to make an appropriate financial contribution towards the Carbon Offset Fund, the level of which, must be reasonably related to the scale of the scheme, justified by Circular 05/05 and subject to financial viability ".</p>	<p>Sufficient flexibility is already built into the policies. Achieving reductions in carbon emissions is a priority locally, nationally and internationally. Policy CS29 (Sustainable Design and Construction) has a caveat relating to the viability and feasibility of the development. No further action.</p>
<p>The Crown Estate - Policy CS28 should reflect District Heating Opportunities needs to be balanced with S106 requirements in order to ensure that developments are not unviable due to the higher standards being set.</p>	<p>See above.</p>

<p>Barratt Strategic - Policy CS28 should be amended to remove the requirement for additional reductions above that required in Building Regulations Part L. Policy CS29 should be amended to state that development should seek to incorporate principles - a to j - where feasible. Where certain principles are not feasible, this should be justified in the planning application submission. This will ensure that the policy has the necessary flexibility to support, rather than deter development required to meet the Strategy's objectives.</p> <p>Gleeson Strategic Land - Whilst the objectives of this section are supported, it is felt that the emerging policies are too lengthy and too detailed for inclusion in a Core Strategy.</p> <p>SEGRO - We suggest that the caveat wording used in Policy 29 (Sustainable Design and Construction) is included in Policy CS28.</p> <p><i>Landowners who have agreed made the following comments</i></p> <p>Grand Union Investments – No comment</p>	<p>The principles contained within Policies CS28 and CS29 are considered sound. It is agreed that a new sentence should be added to the beginning of Policy CS29 to confirm that new development should comply with the highest standard of sustainable design and construction possible and that principles (a) to (j) should normally be followed. This will allow the policy to be applied with an appropriate degree of flexibility should any of the requirements listed not be feasible or relevant to the development in question. Amend text to include the principle that where it is not possible to meet certain criteria, this should be justified as part of the planning application submission.</p> <p>It is accepted that consultation on relevant applications is important. However the principles included in the policy are sound and need to be implemented.</p> <p>See above, under response to Barratt Strategic.</p> <p>Noted.</p>
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Other comments from Landowners

Sutton Coldfield - Defence Estates Safeguarding wish to be consulted on all wind turbine planning applications to verify that they will not adversely affect defence interests.

Comment noted. No further action.

PLACE STRATEGIES

QUESTION 15

Do you support the common local objectives set out in Section 20?				
Responses received	59			
Yes -			No clear answer:	
Key organisations	8		Key organisations	0
Individuals	13		Individuals	2
Landowners	4		Landowners	2
Total	25 responses		Total	4
No -				
Key organisations	4			
Individuals	23			
Landowners	3			
Total	30 responses			
Response		Actions		
<p>Organisations</p> <p><i>Organisations who disagreed made the following comments</i></p> <ul style="list-style-type: none"> Berkhamsted Town Council – In 20.3 a new bullet point should be added: Respect the Character Area Appraisals. The footnote on page 137 refers to government advice that windfall should be ignored for first 10 years of plan. This advice maybe out of date in that the RSS's will be abolished and the Government is introducing a Localism Bill- before agreeing this text we need to see what the Localism Bill will say. The Durrants Lane site should be limited to a capacity of 100 dwellings, as specified in the present local plan. A greater density would not respect the density and character of the adjacent BCA. (Our full set of arguments to oppose this is found in our response to Q.18) Herts County Council (Property Services) - Detailed interrogation of the capacity of schooling to accommodate new development will be possible once the growth option and the housing trajectory that underpins it are selected. Herts County Council (Environment Department) - It 		<p>Chapter 11 covers guidance on urban design. Bullet point 4 (para 20.3) aims to maintain and enhance the character of each settlement. The paragraphs relating to Vision Diagrams will refer to urban design zones.</p> <p>Government advice in PPS3 guides the handling of windfall housing development. The RSS has no bearing on the matter.</p> <p>Also see responses below.</p> <p>Comment noted.</p> <p>Para 19.27 on</p>		

<p>should be noted that part of Dacorum Borough is located within the sand and gravel belt.</p> <ul style="list-style-type: none"> • Tring Sports Forum - A further common local objective should be included to provide for additional leisure assets where there is clear evidence of need. • Chiltern Conservation Board - The Board considers that the vision diagrams for Hemel Hempstead, Berkhamsted, Tring, and Markyate should all include the AONB and its boundary. 	<p>sustainable resource management, together with its footnote, covers this.</p> <p>Strategic Objective 11 covers leisure needs. Local objective – bullet point 5 (para 20.3) – refers to enhancing leisure assets: i.e. better and more, depending on local circumstances.</p> <p>The Countryside Vision Diagram and Key Diagram include the AONB boundary, so no further change is required.</p>
<p><i>Organisations who agreed made the following comments</i></p>	
<ul style="list-style-type: none"> • Markyate Parish Council - We would strongly urge that in relation to Hicks Road, Markyate that the local input from the Parish Surveys and the Parish Council be incorporated in the planning. It is hoped that The Parish Plan will be completed shortly and adopted as a relevant planning document. 	<p>Comments noted. No further action.</p>
<ul style="list-style-type: none"> • Highways Agency and Friends of the Earth – No comments. 	<p>Answers noted.</p>
<ul style="list-style-type: none"> • Jehovah’s Witnesses - We commend the borough for this objective – i.e. 20:3 	<p>Comment noted.</p>
<ul style="list-style-type: none"> • Nettleden with Potten End Parish Council - Improve balance of housing types - reduce emphasis on flats and promote more small family houses. 	<p>The intention is to deliver a balanced mix of housing that reflects the need and demand. Further guidance will be provided.</p>
<ul style="list-style-type: none"> • Hertfordshire Biological Records Centre – We support this approach. 	<p>Comment noted. No further action.</p>
<ul style="list-style-type: none"> • Bovingdon Parish Council - The Parish Council generally supports the objectives, and suggests: (i) employment development is referenced against the need to maintain a balanced, sustainable settlement; 	<p>Comment noted. The fourth local objective is guided by Strategic Objective 9 (Chapter 7). Its intention is to</p>

and (ii) reference is made to the need to tackle parking issues as appropriate.

encourage employment opportunities for local people: the wording will be amended to reflect this. The promotion of the Maylands Business Park will provide job opportunities across Dacorum and a wider sub-region, and will not be a precise match to population growth at Hemel Hempstead. The principle of sustainable development is covered by the first common local objective. Parking issues are a matter covered by the local objectives for Bovingdon.

Individuals

Individuals who disagreed made the following comments

- I think we are putting forward uncosted objectives, often conflicting, with no guarantee of delivery.
- The infrastructure is not maintained properly now.
- The proposals for Durrants Lane/Shootersway are unacceptable: far too big, and completely in the wrong place relative to the town centre. And the proposal does not adhere to the common local objectives.

Chapters 28-30 refer to issues of delivery. Delivery and co-ordination of infrastructure will be considered in more detail through the Infrastructure Delivery Plan, the Developer Contributions SPD, the Site Allocations DPD, development briefs and planning applications. No further action.

Normal maintenance is the responsibility of the relevant provider, who is consulted for their advice. No further action.

Comments noted. The Council will amend the number of units set out in the Place Strategy from 200 to 180 to

<ul style="list-style-type: none"> • The objective to "Reduce peak-time traffic congestion and dependence on car use" is not realistic against the background of modern employment patterns. Working people need to have realistic employment opportunities locally. • Too many homes and wrong mix of dwellings. • There should be an additional objective to encourage as many people as possible to live within one building so there is little or no need for new houses. In addition, there should be an objective to encourage as many people as possible to work from home to reduce commuting and its associated pollution. • I oppose the local allocation at Hanburys and at New Road because of the loss of the Green Belt and housing density issues. 	<p>reflect concerns over capacity. This will be supplemented by detailed work on how the development should be designed and how it can contribute to meeting the objectives for Berkhamsted. It is important that the development remains viable, new homes are provided and effective use is made of greenfield land not falling within the Green Belt.</p> <p>Amend last part of objective. Dependence on car use is addressed by Strategic Objective 4 already. Reducing peak time congestion and its effects is a reasonable objective balancing economic and social needs with environmental consequences.</p> <p>Comment noted. No further action.</p> <p>Such objectives are unrealistic and could lead to unwanted social consequences, such as overcrowding. Important principles, such as reducing car use, are reflected in the objectives however. No further action.</p> <p>Comments noted, no action required. The level of housing for Berkhamsted reflects its size and role and the housing land availability. Hanburys will provide an</p>
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<ul style="list-style-type: none"> • I oppose development until existing infrastructure issues have been dealt with. <ul style="list-style-type: none"> • I support the proposal for Hicks Road. <ul style="list-style-type: none"> • Delete housing Option 2 for Tring <p><i>Individuals who agreed made the following comments</i></p> <ul style="list-style-type: none"> • More housing, particularly affordable needs to be built in popular housing destinations. • Please consider extending existing Gypsy and Traveller sites before allocating new sites. • Yes, but have specific concerns about particular place strategies. <p><i>Other Comments from Individuals</i></p> <ul style="list-style-type: none"> • Have you considered providing more allotment spaces within communities? 	<p>opportunity to secure more affordable housing and family homes. The proposal is for a small, longer term release of land which will have a limited impact on the countryside. This is a reasonably located proposal given the lack of better alternatives.</p> <p>Existing infrastructure issues should be directed to the service providers to rectify. Contributions from new development will be directed towards the resolution of issues associated with that new development, and may help to deal with existing problems. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. This can be considered further in the Site Allocations DPD and other planning. The</p>
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<p>How is all development expected to contribute positively towards meeting the combined objectives?</p> <ul style="list-style-type: none"> • These are popular areas that attract extensive inward migration of residents. There is insufficient affordable housing and market housing being built to cater for the natural expansion of the current population of Dacorum as the things stand. • It is essential that the Core Strategy identifies the Police as a social delivery agency. It is therefore essential that the Police infrastructure is identified as being needed to support development, to which developer contributions maybe required <p>Landowners</p> <p><i>Landowners who disagreed made the following comments</i></p> <ul style="list-style-type: none"> • Grand Union Investments - 'Locally generated housing needs, based on the natural growth of the existing population' should be recognised in the common local objectives set out in Section 20. 	<p>Open Space Study recommends standards for allotment provision.</p> <p>Amend text to refer to the objectives, rather than ‘these combined objectives’. It is not possible to meet all objectives at once, rather they are a list against which the achievement of the strategy and individual developments can be judged. The sixth bullet point (providing guidance for supplementary advice) does not meet this test, and so will be deleted. The Core Strategy provides the guidance for all supplementary advice.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>Comment noted. The Council has to balance housing need with environmental constraints. Therefore providing for natural growth may not be appropriate. No further action.</p>
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<ul style="list-style-type: none"> • Crest Nicholson and Linden Homes (Chiltern) Ltd - Neither of the two identified strategic sites fall within the greater conurbation area of Hemel Hempstead - the main focus for allocating both housing and employment numbers. 	<p>This is correct. However these developments are very important or “strategic” for the town and village they are in. Hemel Hempstead contains two regeneration areas which are very important to the achievement of the place strategy. Both the town centre and Maylands Business Park are subject to further detailed planning; the latter will have an Area Action Plan. No further action is needed in response to the comment.</p>
<p><i>Landowners who agreed made the following comments</i></p> <ul style="list-style-type: none"> • Taylor Wimpey UK Ltd and Banner Homes Limited made no comment • Barratt Strategic - The allocation of land West of Hemel Hempstead for residential development would support these objectives. 	<p>Noted</p> <p>Comment noted. No further action.</p>
<p><i>Other Comments from Landowners</i></p> <ul style="list-style-type: none"> • Sutton Coldfield - Defence Estates wish to review any planning applications that occupy the published height safeguarding zones through the statutory safeguarding consultation process to ensure that developments do not obstruct or degrade the operational capability of these defence facilities. • Gleeson Strategic Land – It is noted that the common local objectives seek to provide a balance of housing and employment which is not apparent from the Borough wide strategy. 	<p>Comment noted. No further action.</p> <p>Amend objective to refer to employment opportunities for local people. Also see response to Bovingdon Parish Council.</p>

Hemel Hempstead

QUESTION 16

Do you consider that the Local Allocations in Section 21 (which are in Housing Option2) are appropriate?

Responses received 61

Yes - Key organisations 1
 Individuals 11
 Landowners 3
Total 15 responses

No clear answer:
 Key organisations 1
 Individuals 3
 Landowners 0
Total 4

No - Key organisations 9
 (Inc. 1 duplicate)
 Individuals 28
 Landowners 5
Total 42 responses

Response

Actions

Organisations

Organisations who have disagreed made the following comments

- Friends of the Earth - If option 1 is supported then there is no reason for the local allocations proposed in option 2.
- No to development at Marchmont Farm (LA1):
 - Hertfordshire Gardens Trust - LA1 could adversely affect the historic character of the village of Piccotts End.
 - Piccotts End Residents Association - Piccotts End Residents' Association is opposed to any development of Marchmont fields.
- No to development at Old Town (LA2):
 - Hertfordshire Gardens Trust – LA2 could adversely affect the historic character of Hemel Old Town.

Organisations who have agreed made the following comments

- Homes and Communities Agency – No comment

In the light of the comments raised and the evidence, the Council has decided to retain all three local allocations.

Their inclusion is necessary to ensure delivery of the Option 2 level of housing – a target of 430 dwellings annually between 2006 and 2031. The overall housing target is explained more fully in response to Question 9 and 10, but is essentially a balance of factors, housing, economic and environmental.

Building new homes and employment growth are essential to the delivery of sustainable development. They reflect national policy and are a principle

Other comments from Organisations

- Markyate Parish Council - Nothing proposed in Section 21 is outside Hemel Hempstead and we would not wish to comment further than we have already done elsewhere.
- No to development at West Hemel Hempstead (LA3):
 - Chiltern Conservation Board - We object to LA3 because of its impact to the AONB. Great care will be needed with the treatment of this site to ensure that the setting of the Chilterns AONB is not detrimentally affected.
 - New Conservation Society - Development of this area would block off one of the most valuable Green Lungs designed in the Master Plan for the creation of Hemel Hempstead and would clearly contradicts many stated objectives in the current Strategy, e.g. Policy CS25: Landscape Character and Policy CS26: Green Infrastructure. The area's footpaths and Pouchen End Lane currently provide a valuable and well used informal recreational amenity for Warners End, Chaulden and Fields End residents. This area has previously been discounted by previous DBC Planners and the Inspector for the Local Plan - a 1500-strong petition of Chaulden and Warners End residents opposing the loss of Green Belt status was raised by Friends of Shrubhill Common and presented to the Council - remove LA3 West Hemel housing development from consideration. Development would increase pressure for a Northern Bypass;
 - Nettleden with Potten End Parish Council - The local objectives are unrealistic - cannot fit all the suggested objectives onto the land available. Therefore likely to put uses such as schools/sports facilities onto open land. Concerns about merging Hemel Hempstead with Potten End. Development west of Hemel Hempstead is totally unacceptable. Access is via Pouchen End Lane which is a very narrow rural lane and would have to be considerably widened to the detriment of the character and appearance of the rural area. Inspector was not supportive of this location for several very valid reasons that have not been overcome.
 - Hertfordshire County Council (Property Services) - The text within the Local Allocation LA3, should be amended to make reference to the fact that it would

objective of the Core Strategy. There are environmental implications from building the local allocations, but these can be kept to a minimum. The selection of local allocations reflects technical work and assessment of the impacts on the Green Belt (reported in the published Assessment of Strategic Site and Local Allocations), as well as public consultation and previous advice from planning inspectors.

The Council can only select locations within Dacorum for new developments. It cannot select sites to the east of Hemel Hempstead, even though the debate over the East of England Plan (Regional Spatial Strategy) pointed to the potential development of that area being the reason why the Panel raised Dacorum's housing allocation to 17,000 dwellings (this is now quashed). The Council would have preferred not to have selected allocations LA1–LA3, but has concluded the need for housing was too strong.

Marchmont Farm would be a modest scale development linked to Grovehill neighbourhood. It would be physically separate from Piccotts End and, with careful strategic

be appropriate to explicitly identify an appropriate 2fe education allocation as part of the Master planning of LA3, West Hemel Hempstead.

- Hertfordshire Gardens Trust - LA3 has the potential to destroy the green boundary between Hemel Hempstead and Potten End and communities towards Berkhamsted
- Is counter to the wider strategic objectives of easing travel between homes and places of work and leisure.

Individuals

Individuals who have disagreed made the following comments

- All three local allocations should be omitted. All of them would mean the loss of Green Belt land.
- More detailed maps, clearly showing if the planned development and proposed building is on green belt and green-field sites.
- It is inappropriate to plan to build more homes in Berkhamsted outside existing residential areas.
- I do not support housing growth in HH.
- At some point, someone must realise that building more is not sustainable. This section seems to focus on homes but it is not desirable to have housing estates without businesses as this enforces commuting by non-sustainable means.
- This level of building is not sustainable. These plans will not achieve the vision of providing a better quality of life, any more than development of the area South of Hemel Hempstead has done. Conversion there to high-density housing of three large factory sites plus smaller industrial areas has resulted in unrestrained growth of road traffic and congestion in general.
- Object to development at Marchmont Farm (LA1):
 - Cannot see that the number of homes suggested for Marchmont Farm are worth having for the cost of infrastructure required;
 - More low cost, high density homes would add to already existing problems of policing/vandalism around Henry Wells Square area.

planting, visually separate.

Land adjoining the Old Town is a relatively small area, although quite sensitive. Design and layout will be critical.

The choice of West Hemel Hempstead reflects a balanced consideration of the issues and environmental impacts. The level proposed of (up to) 900 dwellings would be appropriate to support a new primary school, and create a new neighbourhood. A higher level of housing, up to 1,400 dwellings, would be excessive: transport and environmental impacts would be substantial. Further detailing of the proposal will cover its impact on the locality and the town in terms of the type, level and timing of infrastructure more fully. Provided West Hemel Hempstead is limited in extent it is difficult to envisage significant impacts on the Chilterns Area of Outstanding Natural Beauty, coalescence with Potten End or the need for a northern bypass road. There is sufficient land to enable the landowners to deliver open space and green infrastructure links from Shrubhill Common to the countryside, primary schooling (at 2FE level) and potentially land for a new

<ul style="list-style-type: none"> ➤ Further high density housing would generate more traffic; ➤ It would impact on the historic conservation area at Piccotts End; ➤ It is a key view; ➤ It would significantly increase traffic; ➤ I do not trust developers to get the drainage right, and can see water flooding down into Piccotts End from any new built-up area. ➤ Water supplies/sewerage services are extremely stretched and will not be reassessed until 2015. ➤ There are virtually no useful public transport connections to the railway station and the town centre from this area; ➤ Represents "creeping development" of the worst possible kind: a looming growth of, it is suggested, 2 and 3-storey buildings which could not be screened from view at any point in Piccotts End and across the Gade Valley by tree planting. ➤ New residents will drive unless there is new public transport that is free or heavily subsidised; ➤ The totals in Housing Option 2 involve the provision of too many new homes for the current infrastructure. <ul style="list-style-type: none"> • Object to development at Cherry Bounce (LA2): <ul style="list-style-type: none"> ➤ This is shoe-horning development into a small area and will erode the quaint and tranquil feel of the old town; ➤ This would remove a green gateway to the Old Town; ➤ Even in its scaled-down form, is an unattractive extension of the housing which would enclose that end of the Old High Street. ➤ This piece of land is frequently used by residents when either walking, as a place to relax or play. ➤ This would increase the volume of traffic in a very narrow High Street; ➤ There would be a massive environmental impact on the local habitat; ➤ Three storey development will have an impact on views and block the light out of gardens; ➤ This will impact on the historic nature of the old High Street; ➤ Many dog walkers use the cherry bounce field on a daily basis. • No to development at West Hemel Hempstead (LA3): <ul style="list-style-type: none"> ➤ New access roads required, widening of existing roads and lots more traffic; 	<p>cemetery.</p> <p>For all three local allocations, planning principles (and development requirements), together with potential release for housing, will be considered at a later date through the Site Allocations DPD.</p> <p>In the light of comments raised, the proposals have been amended as follows:</p> <p><i>Marchmont Farm</i></p> <ul style="list-style-type: none"> • strategic scale landscaping will mitigate the effect on the Gade Valley and help ensure separation from Piccotts End. <p><i>Old Town</i></p> <ul style="list-style-type: none"> • delete reference to three storey housing. <p><i>West Hemel Hempstead</i></p> <ul style="list-style-type: none"> • refer to open space, playing fields and a two form entry primary school; • no vehicular access or link to Pouchen End Lane; • strategic scale landscaping will mitigate the effect on the Bulbourne Valley; and • create green infrastructure links. <p>Additional comments in reply to landowners are</p>
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- The scale of development will radically change the character of the area;
- It will cause the coalescence of Potten End, Bourne End and Berkhamsted with Hemel Hempstead;
- Development of a new housing area to the West of Hemel Hempstead is counter to the wider strategic objectives of easing travel between homes and places of work and leisure, and reduction in traffic congestion.
- Loss of open space;
- Aside from open spaces there are no significant existing local leisure facilities to support new housing development at LA3;
- increase in road traffic along already congested routes such as Fishery Lane, London Road, Two Waters, magic roundabout;
- strategic development of employment opportunities is focused on Maylands to the east; supermarkets and retail parks are located at Jarman Park and in Apsley - both to the east of Hemel;
- you cannot possibly fit in all of the suggested objectives onto the land shown available;
- it is outside the Hemel Hempstead built area boundary (figure 19);
- it is designated Green Belt (map 1);
- it is part of the Chilterns landscape area (map 2);
- it is close to a marker for an area of biodiversity opportunity (map 3).

given below.

Individuals who have agreed made the following comments

- Agree with development at Cherry Bounce (LA2)
- Agree with development West of Hemel Hempstead (LA3)
- No comment.
- Buncefield should be closed and the area should be developed for industrial and commercial use.
- Housing option 2 as per pages 152 and 153 to be allocated with a proportional reduction within housing option 1.

Other comments from Individuals

- I see benefit in LA3 if it is to be within reasonable walking distance of the Railway Station. I see benefit in building inside the existing built area in the Old

Town LA2. However, I cannot see that the number of homes suggested for Marchmont Farm LA1 is worth having for the cost of infrastructure required while having no obvious benefits.

Landowners

Landowners who have disagreed made the following comments

- Grand Union Investments - New housing is not considered appropriate in Maylands Business Area. There is no indication, within draft Chapter 21 or indeed draft Policy CS33, where the Authority intend to allocate their new housing of 1800 homes, as part of the town centre regeneration of Hemel Hempstead.

- Akzo Nobel Pension Scheme - With regard to the two housing options proposed for Hemel Hempstead set out in para 21.6, we consider that the annual housing target should be based on up-to-date assessments of demand, supply and need and seek clarification as to how the Council has decided on the local allocations listed.

- No to development at West Hemel Hempstead (LA3):
 - Apsley Development Limited and W Lamb Limited - site has been appraised on the basis of 450 or 900 dwellings but effectively the Core Strategy assumes development of the entire sites (ie 900 dwellings) in order to meet the option 2 housing target. Since LA3 cannot deliver all of its objectives on this site and yet the housing strategy has assumed all of LA3 to

Comment noted. It is reasonable to consider some housing within the East Hemel Hempstead Action Area, for which a target is set. The majority will be in a new neighbourhood at Spencers Park and in the Heart of Maylands. The provision of new homes in the town centre will be explained further in the Master Plan and Site Allocations DPD. Maylands and the town centre are key regeneration areas where the Council is actively supporting new development.

Also see response to Question 9.

come forward, it is obvious that an additional Local Allocation will be required. The Agent representing Shendish would like us to consider this land.

- at odds with Community Strategy Objectives and the Core Strategy's Strategic Objectives to safeguard the Green Belt and the environment;
- Winreb Finance - consider additional housing at Site B Apsley Mills instead;
- On a point of procedure, PPS12 only allows 'strategic sites' to be allocated in Core Strategies. For these reasons, the Local Allocations should be renamed 'Strategic Sites' in the next version of the Core Strategy. It is noted that Hemel Hempstead Vision Diagram on page 155 identifies Marchmont Farm as a 'strategic site'.

Landowners who have agreed made the following comments

- Barratt Strategic - The amount of housing for LA3 should be a minimum of 900 and a maximum of 1,400. The development should be phased and the first phase to come forward should be the land to the south.
- Yes to development at Marchmont Farm (LA1) – Gleeson Strategic Land - We support this site coming forward.
- Yes to development at West Hemel Hempstead (LA3) – Wimpey UK Ltd and Barratt Strategic - at least 450 dwellings plus community infrastructure can be delivered on this sustainable site.

Other comments from Landowners

- We seek clarification as to how the Council has decided on the local allocations listed for Hemel Hempstead

Technical evidence about strategic sites and local allocations is given in the published Assessment of Strategic Sites and Local Allocations. The Council's conclusions take account of a range of factors, including community feedback.

QUESTION 17

Do you support the approach to ‘Hemel Hempstead Place Strategy’ set out in Section 21?

Responses received 54

Yes - Key organisations 8
 Individuals 9
 Landowners 6
Total 23 responses

No clear answer:
 Key organisations 1
 Individuals 2
 Landowners 0
Total 3

No - Key organisations 7
 Individuals 11
 (inc. 1 duplicate)
 Landowners 10
Total 28 responses

Response

Actions

Organisations

Organisations who disagreed made the following comments

- The Highways Agency - queries the anticipated scale and purpose of the proposed lorry park facility. The Highways Agency recommends that the facility is reflected in a strategic traffic assessment. The Highways Agency recommends that a transport assessment is produced for the proposed park and ride, HGV route and lorry park at Maylands.
- St. Albans City & District Council - The north-eastern relief route would involve a significant loss of trees and impact on the rural character of the area within St Albans. Before St. Albans City & District Council can decide whether to support this proposal, we need up to date information on why the road is needed in transportation terms and whether the road should go into St Albans District, given the Buncefield redevelopment proposals.

The issues are more appropriately considered in the East Hemel Hempstead Area Action Plan. The scale of proposals will be proportionate to the needs of Maylands Business Park and the town. The HGV route is actually the North East Hemel Relief Road – a current proposal in the Local Plan and part implemented. The relief road was initially, justified through the Hemel Hempstead Transportation Study (1992-95) and has the support of the local highway authority. It has been tested in the Hemel Hempstead Transport Model (2009/10). The exact

<ul style="list-style-type: none"> • Hertfordshire County Council (Environment) - Reference should be made to the archaeological heritage of the area covered by the East Hemel Hempstead vision. This includes the Scheduled Roman barrow and temple complex and the identification of previously unknown heritage assets, as has been demonstrated by recent discoveries made during the widening of the M1. • Box Moor Trust - Resources need to be secured for the on-going upkeep and management of communal areas. • Hertfordshire County Council (Property Services) – suggests reference to 'education' and a 'new library' in Policy CS33 (point 1). It suggests that local objective (f) for East Hemel Hempstead reads: "f) a district heating network, linked to an energy and waste park, which could also include an enlarged Household Waste Recycling Centre and In Vessel Composting facility". • Sport England – The loss of the former playing fields in the Maylands Gateway area would not accord with Sport England's playing fields policy or Government policy in PPG17 (paragraphs 10-15), unless there was an agreed compensatory project being implemented in tandem. • Nettleden with Potten End Parish Council – No 	<p>alignment and delivery of the road will be considered further with the Highways Agency and St. Albans Council and others. The development of Spencers Park and completion of this road are linked.</p> <p>The text in Section 18: Historic Environment will be amended to reflect the importance of archaeological heritage in the Borough.</p> <p>Policy CS35 relates to infrastructure: further guidance with follow.</p> <p>Amend Policy CS33 to refer to the need for a school and a library. Update local objectives: the need for better waste management facilities will be recognised, although this may not be pursued through one energy and waste park. The Area Action Plan will examine the issues further.</p> <p>This will be addressed through the East Hemel Hempstead Area Action Plan and the Site Allocations DPD. Reference will be made in the strategy for the town.</p> <p>Noted.</p>
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<p>comment.</p> <p><i>Organisations who agreed made the following comments</i></p> <ul style="list-style-type: none"> • EEDA - continues to support the concentration of economic growth and regeneration within the town of Hemel Hempstead and the identification of the Maylands Business Park as the key employment location for the borough, as being a highly sustainable approach. • Jehovah's Witnesses – thoroughly support the delivery of new leisure and cultural facilities. • Friends of the Earth – supports Option 1 as this lessens the impact to the town. • Hertfordshire Gardens Trust - We welcome the intention to regenerate the Jellicoe designed Water Gardens. We are concerned that the proposed new covered bus station will impact negatively on the Water Gardens. • Herts Records Biological Centre – Consider identifying extended links to the countryside for Howe Grove LNR. • British Standards Institute and The Theatres Trust – No comment. <p><i>Other Comments from Organisations</i></p> <ul style="list-style-type: none"> • Berkhamsted Town Council - The terms used to describe the Hospital in the Core Strategy should be 	<p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Comment noted. No further action.</p> <p>Bus facilities and interchange in the town centre are to be rationalised and improved for travellers. The need for a separate covered bus station is under consideration and further work being undertaken. The effect of any new development on the Water Gardens will be fully considered. Amend reference to covered bus station.</p> <p>Consider further through Site Allocations DPD and Green Infrastructure SPD as appropriate.</p> <p>Noted.</p> <p>Amend text. The delivery of a new hospital facility, albeit with less facilities, is being referred to as a new Local General</p>
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<p>revised as it could be misinterpreted.</p> <p>Individuals</p> <p><i>Individuals who disagreed made the following comments</i></p> <ul style="list-style-type: none"> • The term, General Hospital, reflects a historic description of hospital services and allows for many different connotations: a wrong description will bring a misunderstanding and wrong expectations • A 3 bedroom house must have a minimum of 3 people sleeping there. Garage space should be limited to vehicles only to reduce on street parking. • Maylands should not be regenerated due to its proximity to the Buncefield time bomb. • Development should be more evenly spread over east, central and west Hemel. • There should be no new supermarket or civic facilities in the town centre. 	<p>Hospital by the NHS.</p> <p>Consider further through Site Allocations DPD and Green Infrastructure SPD as appropriate.</p> <p>The underlying issues are noted. The specific points however are neither appropriate to a Core Strategy not capable of practical enforcement.</p> <p>The Council's aspirations are set out in the Maylands Master Plan and have the support of the business community.</p> <p>The main development opportunities are set out in the Consultation Draft and reasonably spread. The key regeneration areas are the town centre and Maylands. Potential local allocations have been separately assessed (also see below). No further action.</p> <p>Technical evidence supports the need for a new supermarket. New civic facilities are recommended to help the regeneration of the town centre and provide a better, lower cost facility for the public. No further action.</p>
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<ul style="list-style-type: none"> • Development of Shendish Manor land offers the most sustainable contribution available toward the provision of housing land to satisfy anticipated demand. • 900 is a very large number of buildings for the west of the town. Reduce the number of proposed houses in West Hemel Hempstead (LA3) to 50 new homes. • West Hemel Hempstead is very ill conceived. It is far from the town centre, it is a wildlife corridor, and Pouchen End Lane is a very narrow rural lane, which leads into Boxted Lane/Hempstead Lane which cannot cope with increased traffic. The Inspector was previously very critical of this site. • We are particularly concerned at the growth planned for East Hemel Hempstead (and St Albans) which could, over the long term, lead to coalescence. It could also have a potentially disastrous effect on Redbourn. • Specifically, we would oppose the development of the area to the east of Spencer's Park and south of the Nickey Line, because of the increased risk of coalescence with Redbourn. <p><i>Individuals who agreed made the following comments</i></p> <ul style="list-style-type: none"> • We must have a working Hospital with full facilities. 	<p>Supporting technical work has considered a number of potential local allocations. This work effectively ruled out Shendish and Nash Mills as appropriate development sites, because of their particular impacts. The assessments have considered the effects of potential development locations on Green Belt objectives. While West Hemel development would encroach on the Green Belt, there would be no coalescence with Potten End. Spencers Park is not in the Green Belt, and development to the east of it would be the responsibility of St. Albans Council. The Area Action Plan is no longer considering major development (neighbourhood expansion) in this area. Local Allocation in Dacorum will be planned through the Site Allocations SPD, and detailed points such as wildlife corridors can be dealt with. The size of the West Hemel option has been extended from that considered at the previous Local Plan Inquiry to the size of a new neighbourhood. Also see response to Question 16.</p> <p>Amend text. The delivery of a new hospital facility, albeit with less facilities, is being referred to as a new Local General</p>
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<ul style="list-style-type: none"> • A General Hospital should be provided. • I would like to see a really effective arts centre big enough for opera and ballet, etc. • Health & Safety used to demand 1/2 mile distance around an oil depot. Are you going to demand this criterion in future? • The light Industrial uses allocated to Frogmore Road Industrial area should be moved to Maylands Industrial Estate. <p><i>Other Comments from Individuals</i></p> <ul style="list-style-type: none"> • Overall the Council should focus on the hard activities and essential services and less on creating Utopia. 	<p>Hospital by the NHS.</p> <p>The Council is aware of residents' wishes for a town centre theatre. However there are major obstacles, including the initial financing and running costs. The viability of such a development will be tested as part of the Hemel Hempstead Town Centre Masterplan. No further action.</p> <p>The Council will have regard to the COMAH regulations and advice of the Health & Safety Executive. Safety is the key issue. The risk to safety declines further away from the site. Currently housing should not normally be built within 400m. No further action.</p> <p>The land is allocated as employment land and could be changed in the Site Allocations DPD if there is clear justification: i.e. a need for an alternative use and appropriate land for redeployment of the existing uses.</p> <p>Comment noted.</p>
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<p>Landowners</p> <p><i>Landowners who disagreed made the following comments</i></p> <ul style="list-style-type: none"> • Crest Nicholson and Linden Homes - Additional allocations are needed to support the housing needs of the Borough. It is considered that the Nash Mills site can be brought forward as a local allocation and the conclusion that the site is discounted because of infrastructure capacity and erosion of the Green Belt is refuted. • Grand Union Investments – A mix of viable employment land uses in Maylands is actively encouraged. New housing is not considered appropriate in Maylands Business Park. There is no indication in Chapter 21 where the Council intend to allocate the new housing (1800 homes) for the town centre. • Akaria Investments Ltd and Standard Life Investments Ltd - Remove references to both new department store and new supermarket. As a key stakeholder of the town centre, we would wish to be actively involved in the development of the town centre master plan. • Apsley and W Lamb Ltd – The town centre vision should state, ‘Extensions to the town will contribute fully to its success’. • Aviva Investors -The Maylands Business Park Vision should not be prescriptive, but instead should be described in a similar fashion to Figure 18 and Policy CS34. 	<p>See response to individuals above.</p> <p>Comments noted. However, small-scale residential development is deemed appropriate in certain locations, adjoining existing residential areas and in the heart where new facilities can support a local population. The Town Centre Masterplan (and Site Allocation DPD) will consider the delivery of new housing – around 1800 dwellings – creating a town centre neighbourhood. The text will be amended to reflect this.</p> <p>The commenter’s role as a key stakeholder is noted. Reference will be made to new retail stores and supermarket, as these are supported by evidence.</p> <p>This may be applicable to the town vision but not the town centre vision. No further action.</p> <p>The vision explains what the area should be like. Policy CS34 (and Figure 18) considers how the vision can be delivered. No further action.</p> <p>The level of housing being proposed is based on sound evidence and</p>
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<ul style="list-style-type: none"> • Gleeson Strategic Land - the priorities and objectives for Hemel Hempstead are sound. However overall a nil net migration housing strategy does not reflect the available evidence and is not a sound approach. • SEGRO – Figure 18 has policy weighting. The concern is that it may limit development opportunities that fall outside its scope. Greater flexibility should be added to allow B2 and B8 uses in the Face of Maylands in the northern part of the zone as stated in the Maylands Masterplan. There should also be a caveat at the end of Policy CS34 to relax the principles if development is unviable. <p><i>Landowners who agreed made the following comments</i></p> <ul style="list-style-type: none"> • The Crown Estate - Our land to the east of Hemel Hempstead falls largely in St. Albans City and District. The location should be assessed in the Assessment of Local Allocations and Strategic Sites document, particularly as the Core Strategy refers to the delivery of a new cemetery, park and ride and new sports ground that may require an extension into this land. Cross-boundary co-operation and joint working should be put into practice. • Barratt Strategic – Option 2 is supported in light of: <ul style="list-style-type: none"> ➢ anticipated natural growth levels; ➢ increased economic activity in Hemel Hempstead; ➢ the potential to develop new infrastructure; and ➢ create a neighbourhood in accordance with the original design of Hemel Hempstead. <p>Indeed we feel consideration should be given to increasing</p>	<p>consultation responses, and is reasonable in the circumstances (also see response to Question 9). No further action.</p> <p>The policy wording reflects the principles set out in the Maylands Master Plan, and aspirations sought for the East Hemel Hempstead Area Action Plan. It already includes flexibility though this can be considered further in the Action Plan. No further action is necessary.</p> <p>This land was considered in the Assessment of Alternative Growth Locations for Hemel Hempstead with St. Albans Council. It was not considered in the Assessment of Local Allocations and Strategic Sites document because the land is not in Dacorum. The principle of joint working with St. Albans Council is acknowledged.</p> <p>Comments noted. The Council did not put forward an Option larger than 900 dwellings because of the effects this would have on landscape, local traffic conditions and the accommodation of local facilities. The threshold for a new neighbourhood and primary school (1 form entry) is around this</p>
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<p>housing numbers on land west of Hemel Hempstead to allow for in-migration and a critical mass that will support new infrastructure such as a new local centre and school.</p> <ul style="list-style-type: none">• Taylor Wimpey UK Limited, USS, National Grid Property and Gas, and ING Real Estate Investment Management – No Comments.	<p>level, or a little less.</p> <p>Noted.</p>
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Berkhamsted

QUESTION 18

Do you consider that the design and layout principles listed for Proposal SS1 (Egerton Rothesay School) are appropriate?

Responses received 283

Yes - Key organisations 3
 Individuals 6
 Landowners 1
Total 10 responses

No clear answer:
 Key organisations 0
 Individuals 0
 Landowners 0
Total 0

No - Key organisations 5
 Individuals 267
 (261 from Berkhamsted)
 Landowners 1
Total 273 responses

Response

Actions

Comments from key organisations:

Organisations who disagreed made the following comments:

Berkhamsted Youth Council:

- It is unclear how development of an independent school will benefit the whole community.
- The scheme will place additional strain on St Mary's and Westfield primary schools and eventually Bridgewater and Ashlyns, for which there is no provision made in the outlined plan.
- Supports the idea of new drop off facilities and the Green Plan for the school, which is a potential solution for solving the traffic congestion in this area during school drop-off/pick-up times.
- There are also issues with sewage and water pressure in this area, which will be augmented by this increase in houses.
- There would be a need for public transport to this area.
- It is quite a distance from the majority of the town's amenities like supermarkets and would increase the amount of car use and traffic in the town.

Comments noted, no action required. The proposal is not only about the Egerton Rothesay School. It is concerned with securing a high quality development to meet the local housing needs of the town together with a package of community benefits, in a location within the urban area. The County Council is seeking to increase school places in the town through temporary and permanent expansions of schools, and longer term through two new schools.
 Support for measures to address traffic

<p>Transition Town Berkhamsted:</p> <ul style="list-style-type: none"> • The housing should be planned and laid out to be low energy, environmentally sensitive and sustainable to benefit of wildlife and population alike. • There should be sufficient community or private space to grow food, allow for water harvesting, and create soakaways for water dispersal. • Sustainable transport measures should be promoted including a bus service to serve the site, and attractive footpaths and cycle lanes. <p>Berkhamsted Citizens Association:</p> <ul style="list-style-type: none"> • The scheme is at too high a density; • The capacity should be reduced; and • Infrastructure should be put in place before the development starts. 	<p>congestion is acknowledged. The proposal will have to address its impact on the locality and the town in terms of the type, level and timing of infrastructure. The site is in a reasonably accessible location. It is unlikely to prove large enough to justify a separate bus service though it is possible to consider re-routing of a bus service at a future date through the Urban Transport Plan. The Council cannot prevent residents using their cars, however accessible the location. The scheme should contribute towards new footways, cycle lanes, and funding bus services in the town.</p> <p>Comments noted, no action required. The development principles seek to deliver such a sustainable scheme. The Master Plan for the scheme identifies the potential for allotments. Sustainable transport measures are being promoted.</p> <p>A further reduction in the level of housing to 180 new homes is proposed. This change addresses local concerns about environmental impacts and gives more flexibility for the layout to fit in with neighbouring urban design areas – the semi-urban and peripheral zones shown on the</p>
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<p>Berkhamsted Town Council:</p> <ul style="list-style-type: none"> ● There is no need for the increase in capacity from 100 to 200 homes. ● It is distant from the town centre and not served by public, and will thus lead to travel by car. ● The lack of a pavement will compromise the safety of pedestrians and cyclists along Durrants Lane. ● The development will exacerbate problems with low water pressure and sewage blockages. ● The high density is out of character with the area. ● The general approach to the layout is acceptable, except for the capacity. ● The additional football pitches and allotments is welcomed. 	<p>Berkhamstead vision diagram. It will be supplemented by detailed work on how the development can be designed to address how the development can meet local concerns. However, it is important that the development remains viable and delivers homes that are needed, and effective use is made of greenfield land in the urban area. This will limit how far the capacity should be reduced. Also see above responses.</p> <p>Comments noted, no action required except in relation to capacity. The proposal is different from that in the Local Plan. It uses a different (larger) land area and is put forward in the context of a longer plan period and higher level of housing need. Effective use should be made of the site. The dwelling capacity now proposed is 180.</p> <p>See responses above on accessibility and infrastructure. Good footpath connections across and into the site should help address concerns over the lack of pavements. The site is well screened and self-contained, and together with careful layout and design should address issues over character and density. Comments on layout, pitches and allotments</p>
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<p>Hertfordshire Biological Records Centre:</p> <ul style="list-style-type: none"> • The development should incorporate existing hedgerows and woodland within a green infrastructure. • The existing environment is locally valuable and can make a positive contribution to the development. <p>Sports England:</p> <ul style="list-style-type: none"> • supports the design and layout principles as they seek to deliver new playing fields and sports facilities for Egerton Rothesay School and the community. • Welcome early engagement in the Master Planning process. <p>Friends of the Earth support the proposal but gave no reasons.</p> <p>Comments from individuals:</p> <p><i>Individuals who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • The proposal is gross overdevelopment. • Object to principle as well as the scale of development. • It should be scaled back or stopped. • The capacity should be at or less than 100 as this is more appropriate for the location. <ul style="list-style-type: none"> • There is insufficient explanation given to clarify the increase in the capacity of the site over the original allocation in the Local Plan. <ul style="list-style-type: none"> • The scale of development is inappropriate for the 	<p>are acknowledged.</p> <p>Agreed. These points are already covered by the Master Plan supplementing the allocation.</p> <p>Comments noted and agreed.</p> <p>Comment noted, no action required. Support acknowledged.</p> <p>Comments noted. The Council will amend the capacity as outlined above. However, it is important that the development remains viable and effective use is made of greenfield land in the urban area. This will limit how far the capacity should be reduced.</p> <p>The role of the Core Strategy is to focus on the future nature and deliverability of the scheme. The Local Plan allocation was considered unviable by the landowners and would not have been delivered in its original form.</p> <p>Comments noted, no action required. The site</p>
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<p>character of the town, this sensitive ridge-top location adjacent to open countryside, and surrounding low density houses.</p> <ul style="list-style-type: none"> • The density contradicts the Vision Diagram. • It is contrary to planning policies for the Shootersway area. • The proposed housing does not respect the privacy of existing homes on Chalet Close. <ul style="list-style-type: none"> • The development should not be used to secure funds/profit for private schools/developers. • The services the school provides should be provided in local state schools. <ul style="list-style-type: none"> • Too many homes have already been built in the town, including through infilling. There should be no further building. <ul style="list-style-type: none"> • No account has been taken of the responses to the Emerging Core Strategy (2009) that opposed the development. 	<p>is well screened and self-contained, and together with careful layout and design, taking account of the ridge top location, should address issues over character, density and privacy.</p> <p>Comments noted, no action required. Egerton Rothesay School (ERS) is an independent school providing specialist education for private fee paying and state sponsored pupils in the borough and across the county. The development will impact on the activities of the ERS, and thus there is no reason why they, as a landowner, should not benefit from the scheme. How specialist schooling is provided is not a planning matter.</p> <p>Comments noted, no action required. The evidence base for the Core Strategy does point to the town being able to accommodate additional housing.</p> <p>Comment noted, no action required. The site is within the urban area and available. The site's dwelling capacity was reduced in the light of previous consultation and a further small reduction is recommended above. The Council considers this a key housing proposal that should be delivered.</p>
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<ul style="list-style-type: none"> • There are better sites for development closer to employment and other facilities. For example, land to the north of the site (Durrants Lane) could be considered for development. • The problem that needs addressing is not the shortage of homes but the over population of the town, region and country. • The south east is overdeveloped and is exceeding its ecological capacity. • The proposal should more appropriately be identified as a Peripheral rather than Semi-Urban zone on the Berkhamsted Vision Diagram. • It is an inappropriate site for affordable housing as it is away from amenities. • The CSa environmental report commissioned by the landowners does not properly refer to the level of 	<p>Comments noted, no action required. There are no alternative available sites of this scale that can deliver an equivalent package of community benefits outside of the Green Belt in the town. Reasonable alternatives have been considered in the published Assessment of Strategic Sites and Local Allocations.</p> <p>Comments noted, no action required. The aim of the Core Strategy is to tackle the development needs of residents in the borough within its environmental capacity.</p> <p>Comments noted, no action required. The designation should logically reflect the proposed capacity of the allocation, the nature of the site, the need for (and impact of) new housing and the fact that two different urban design zones adjoin the site.</p> <p>Comments noted, no action required. Given the characteristics of the site and the nature of the development, this is an appropriate site for affordable homes.</p> <p>Comments noted, no action required. While it is acknowledged that the CSa report does not</p>
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<p>housing proposed.</p> <ul style="list-style-type: none"> • The Council's sustainability report (Table 6.4) states that the proposal will have a greater impact than that in the Local Plan. 	<p>refer to the current level of housing it has still comprehensively assessed the ecology across the whole of the site. The proposal is a different scheme to that proposed in the Local Plan. There would be more homes, although the principal green spaces would be the same. More houses may have a greater environmental impact, but that does not mean that the development is unreasonable.</p>
<ul style="list-style-type: none"> • The proposal contradicts Objective 6, and Policies CS8(a) and (g), CS26 and CS27. • The proposal conflicts with Policies CS1, CS2 (B4), CS4 and CS5. 	<p>Comments noted, no action required. The proposal accords with Policies CS1, CS2, and CS5 in terms of its justification, location, impact and timing. Policy CS4 is not relevant to the allocation.</p>
<ul style="list-style-type: none"> • Money is taking priority over the decision-making process. 	<p>Comments noted, no action required. It is important that a scheme is viable to ensure it can be delivered. However, this has to be carefully balanced against its impact on other site related factors.</p>
<ul style="list-style-type: none"> • The scheme will provide housing for people moving into the town rather than local people. 	<p>Comments noted, no action required. The Council cannot rigidly control occupancy. The scheme would be available to a mix of both local people and those from outside of the town. The affordable homes would be available to local people through local nominations.</p>

<ul style="list-style-type: none"> • A care home is preferred over housing. • Brownfield sites should be targeted for development. • The infrastructure, utilities and services in the town are not sufficient to support the proposed development. This included the roads, schools and lack of parking in the town centre. The cost of parking at the railway station has not helped the latter. • New infrastructure should be put in place before the development is built. • The proposed new schools in the town will never be built. • Water pressure is too low to serve the development. 	<p>Comment noted, no action required. The priority of the scheme is to deliver housing rather than a care home.</p> <p>Comments noted, no action required. The Core Strategy already assumes a significant part of the housing supply will come forward on brownfield sites.</p> <p>Comments noted, no action required. The proposal will have to address its impact on the locality and the town in terms of the type, level and timing of infrastructure.</p> <p>The County Council is seeking to increase school places in the town through temporary and permanent expansions of schools, and longer term through two new schools.</p>
<ul style="list-style-type: none"> • More space should be left for drainage otherwise it will result in flooding. • There are inadequate details of foul water disposal. 	<p>Comments noted, no action required. The proposal will be required to have a suitable drainage scheme in place. This level of detail would normally be provided at a later stage of the development.</p>
<ul style="list-style-type: none"> • The lack of public transport to serve the housing scheme, its distance from the town centre, and the number of proposed homes will lead to congestion and traffic and safety problems for a variety of users on surrounding local roads. • If the proposal goes ahead there will be too many access points on to Shootersway. This is dangerous. • The scheme is contrary to the town strategy of promoting non car travel. 	<p>Comments noted, no action required. The local highways authority is satisfied that the local highway can accommodate the traffic generated by the proposal. The site is in a reasonably accessible location given the lack of</p>

<ul style="list-style-type: none"> • No space for cycle schemes proposed. • The proposal should contribute to improvements to the Kings Road / Shootersway junction. • Congestion and accident risk evaluation must be carried out prior to granting planning permission, and this must involve the emergency services. • The planned development has inadequate parking for the housing, school and sports amenities. • There is a marked difference in traffic generation estimates (AM peak) provided by the Highways Authority between the current and earlier proposal. This has not been adequately explained. • Poor parking provision is deterring shoppers using the town centre. <ul style="list-style-type: none"> • The impact of the existing school on Durrants Lane needs to be addressed e.g. on-street parking problems. Its further expansion should be controlled. <ul style="list-style-type: none"> • Development should not extend into the Green Belt west of Durrants Lane. • Green Belt land should be protected. • The town needs to retain its green spaces. • The scheme will lead to the loss of green space, agricultural land, and Green Belt land. • The site should be used to supply locally grown food thereby reducing food miles. 	<p>suitable and alternative sites on the edge of the town. The proposal will have to ensure that its parking demands are met and road and junction improvements are in place to serve the development. These measures must seek to limit its impact on the local highway and other road users. No matter how accessible the location residents will use their cars, but there are opportunities to encourage cycling and walking. The developer will work with the local highways authority to identify the most appropriate highway solutions.</p> <p>A more detailed transport assessment will be carried out.</p> <p>Comment noted, no action required. The development proposes a number of measures to lessen the impact of ERS on local roads. Any future proposals to expand the school will be dealt with on its merits.</p> <p>Comments noted, no action required. The building site is already removed from the Green Belt. Its use will ease pressure for release of other sites in the Green Belt and will contribute additional open land for the benefit of the ERS and the town. The loss of the site is unlikely to significantly impact on reducing food miles. It</p>
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<ul style="list-style-type: none"> • The development will impact on a local habitat and associated wildlife (including bats). • The ecology survey has not properly identified and taken note of local wildlife (e.g. kites). • The report failed to mention the presence of badgers and bats. 	<p>does provide potential for allotments.</p> <p>Comments noted, no action required. An ecological appraisal of the site has been undertaken and no habitats of significant ecological value were identified. This work investigated a range of animals including amphibians, bats, badgers and birds.</p>
<ul style="list-style-type: none"> • Visitors will principally arrive by car to use the sports facilities. This will adversely affect the rural character of the area. • The sports facilities will chiefly be used by existing and the new residents in the area. • Berkhamsted does not need additional playing fields as the existing facilities are adequate and centrally located. They will lead to on street parking problems. • The sports facilities proposed should predominantly be restricted for the use of local people. Need to address safeguarding public access to the shared facilities. 	<p>Comments noted, no action required. The proposal will have to satisfy its demand for parking. Some of the school parking could be used to meet demands outside of school hours. There is an identified shortfall of open space in the town when measured against national standards.</p>
<ul style="list-style-type: none"> • The standard of house building in the town in recent years has been poor e.g. Ravens Lane, Springfield Road, and Stag Lane. • A good variety of house types should be provided. 	<p>Comments noted, no action required. The Council will seek a high quality of development from the proposal. The scheme will secure a range of housing types.</p>
<ul style="list-style-type: none"> • The proposed access road across the site will adversely impact on Grim's Ditch. It should be retained within an area of open space including a 30m buffer zone. 	<p>Comments noted, no action required. The feature will be protected and retained as part of the development layout</p>
<ul style="list-style-type: none"> • If the school is replaced elsewhere on the site it will be more visible. 	<p>Comment noted, no action required. There is no proposal to relocate the school building.</p>

<ul style="list-style-type: none"> • A convenience store should be provided to reduce traffic to the town centre supermarkets. • The Blegberry Gardens site should not be developed. • The County Council should re-purchase the ERS site and reopen it as a state school. • The County Council is in a position of conflict being in a position of approving the proposal. • Further expansion of the BFI site is unsustainable. 	<p>Comment noted, no action required. The scheme is too small to justify a convenience store and would reduce the land available for housing / open space.</p> <p>Comment noted, no action required. The Core Strategy is not promoting the site for housing.</p> <p>Comments noted, no action required. Ownership of the school is not a Core Strategy matter. It is the Borough Council who will ultimately determine any planning application.</p> <p>Comment noted, no action required. See responses to Question 20.</p>
<p><i>Individuals who agreed made the following comments:</i></p> <ul style="list-style-type: none"> • It is an appropriate site and location, but does not address the local transport needs. • Four individuals supported the proposal but gave no reasons. 	<p>Comment noted, no action required. See earlier response to highways issues.</p> <p>Support acknowledged.</p>
<p>Comments from landowners:</p> <p>Grand Union Investment:</p> <ul style="list-style-type: none"> • This site is considered unsustainable, sporadic development which is contrary to central planning policy guidance. • Land to the south of Berkhamsted is a more appropriate proposal to accommodate the demonstrable local housing need. • The site is considered to lack the critical mass potential to collectively or individually assist in 	<p>Comment noted, no action required. This is a modest scale of development in a reasonably accessible location outside of the Green Belt. It will contribute towards meeting local housing needs of the town and</p>

<p>meeting the future housing needs at Berkhamsted.</p> <ul style="list-style-type: none"> • It should be removed as an allocation. 	<p>deliver a package of community benefits. Land south of Berkhamsted has been appraised in the published Assessment of Strategic Sites and Local Allocations: it is not a preferred location.</p>
<p>Taylor Wimpey UK Limited:</p> <ul style="list-style-type: none"> • Supports the proposal. • Greater flexibility over the planning of the site should be provided. • The planning requirements should refer to development of “around” 200 dwellings. • The principles should refer to development up to 3 storeys in height where appropriate as part of a detailed site appraisal and in terms of design. 	<p>Comments noted, no action required. Support acknowledged. It is important that the Core Strategy provides clear guidance over the nature and timing of the development. See earlier comments on reducing the capacity of the allocation. Heights of buildings can be considered through detailed work on how the development can be designed. Lower lying land, below the ridge top, may offer some scope, but this is a sensitive location and in general tall buildings could adversely affect the character of the area.</p>

QUESTION 19

Do you consider that the Local Allocation LA4 (Hanburys) is appropriate to meet the longer term needs of Berkhamsted?

Responses received 228

Yes - Key organisations 1
 Individuals 12
 Landowners 0
Total 13 responses

No clear answer:
 Key organisations 0
 Individuals 1
 Landowners 0
Total 1

No - Key organisations 3
 Individuals 209
 (204 from Berkhamsted)
 Landowners 2
Total 214 responses

Response

Actions

Building new homes and employment growth are essential to the delivery of sustainable development. They reflect national policy and are a principle objective of the Core Strategy. There are environmental implications from building the local allocations, but these can be kept to a minimum. The selection of local allocations reflects technical work and assessment of the impacts on the Green Belt (reported in the published Assessment of Strategic Site and Local Allocations), as well as public consultation and previous advice from planning inspectors.

A fuller response will be prepared following Cabinet recommendations on 26 July 2011.

Comments from key organisations:

Organisations who disagreed made the following comments:

Friends of the Earth:

- Support housing option 1 and therefore object to its release.
- Stronger protection needed for the Green Belt and green infrastructure.

Comments noted, no action required. See responses to Questions 9 and 10 on housing options. The proposal is for a small release of land which will have a limited impact on the Green Belt and green

<p>Berkhamsted Youth Town Council:</p> <ul style="list-style-type: none"> • It is a reasonable location. • Need for a buffer to be maintained with A41 and to maintain a wildlife corridor. <p>Berkhamsted Town Council:</p> <ul style="list-style-type: none"> • Dispute the housing target for the town, so no Green Belt release is necessary. • It represents a significant encroachment on the countryside. • The site is not well located to services other than schools. • The ridge top location would discourage cycling and walking, and greater car use would increase emissions. <p>Comments from individuals:</p> <p>Many of those objecting referred to their previous response to Q18 and the combined effect of the two housing schemes.</p> <p><i>People who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • The allocation should be enlarged to include adjoining land at The Old Orchard. This will deliver a more comprehensive and logical Green Belt boundary, and has the potential to provide additional land to secure junction improvements at Kings Road, Shootersway. 	<p>infrastructure.</p> <p>Comments noted, no action required. Support acknowledged. A significant buffer will exist between the proposal and the A41.</p> <p>Comments noted, no action required. The level of housing for the town reflects its size and role and the potential housing land availability. Hanburys will provide an opportunity to secure more affordable housing and family homes. The proposal is for a small, longer term release of land which will have a limited impact on the countryside. This is a reasonably located proposal given the lack of availability of better alternatives.</p> <p>Comments noted and amend the Place Strategy and local allocation to refer to a slightly enlarged site. The Council agrees that this is logical in planning terms, but given the land's sensitive location the capacity should not be increased.</p>
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<ul style="list-style-type: none"> • The Green Belt should be safeguarded from development. There is no justification for its release on housing grounds and it would represent a significant encroachment into open countryside. 	<p>Comments noted, no action required. Hanburys will provide an opportunity to secure more affordable housing and family homes. The proposal is for a small, longer term release of land which will have a limited impact on the countryside.</p>
<ul style="list-style-type: none"> • Object to the level of development at the ERS site, and would prefer to see no more than 60 homes there. 	<p>Comments noted, no action required. See responses to Questions 18 and 22.</p>
<ul style="list-style-type: none"> • It should be scaled back (possibly to 15 homes) or abandoned. • The proposal is gross overdevelopment / too high a density. • The scale/density of development is inappropriate for the character of the town, and surrounding low density houses. • It is contrary to planning policies for the Shootersway area. 	<p>Comments noted in all cases, no action required. If the site is to be released from the Green Belt, then effective use should be made of the land to ensure viability and the delivery of affordable housing and family homes. This also has to be balanced against the local character of the area.</p>
<ul style="list-style-type: none"> • The allocation is appropriate as a long-term housing site. • There should be greater emphasis on the reuse and conversion of buildings to housing. 	<p>Comments noted, no action required. The aim of the Core Strategy (Policies CS2 and CS3) is to encourage reuse of buildings and land. It has also identified local allocations as housing land reserves.</p>
<ul style="list-style-type: none"> • The scheme will not lead to a soft edge to the town. • The proposal is contrary to the Vision being in a sensitive valley top location. • Sites on the outskirts of the town should not be developed. • The scheme will lead to the loss of Green Belt land, which will set a precedent for outward expansion of Berkhamsted to the A41 bypass. 	<p>Comments noted, no action required. The site is well screened, compact, and self-contained and thus will protect the character of this location. Careful design and existing landscaping can reinforce a soft edge to</p>

<ul style="list-style-type: none"> • The proposal conflicts with policies: CS1, CS2, PartB4, CS4 and CS5. 	<p>the development. Its release does not necessarily justify future outward expansion in this location.</p>
<ul style="list-style-type: none"> • The town cannot copy with this and the 1000 homes the strategy plans for. It has reached its natural limit. 750 homes may be a more appropriate level. • The infrastructure, utilities and services in the town are not sufficient to support the proposed development. This included the roads, schools, health and community facilities, utilities, and lack of parking in the town centre. • An infrastructure strategy report is needed in conjunction with the relevant providers. • Water pressure is too low to serve the development. • New infrastructure should be put in place before the development is built. 	<p>Comment noted, no action required. The proposal does accord with Policies CS1, CS2, and CS5 in terms of their justification, location, impact and timing. Policy CS4 is not relevant to the allocation.</p>
<ul style="list-style-type: none"> • There are no firm plans to increase school places. 	<p>Comment noted, no action required. The evidence base to the Core Strategy suggests the town can accommodate a higher level of housing. The level of growth is indicative rather than a target. The proposal will have to address its impact on the town in terms of the type, level and timing of infrastructure.</p>
<ul style="list-style-type: none"> • The long term needs of Berkhamsted would be best met by the stabilisation of the population. 	<p>Comments noted, no action required. The County Council has specifically identified that Greenfield and Westfield Schools will be expanded.</p>
<ul style="list-style-type: none"> • Blegberry Gardens should come forward for housing instead of Hanburys. 	<p>Comment noted, no action required. Even if the existing population stayed static, some new housing would still be required because of the predicted fall in household size.</p> <p>Comment noted, no action required.</p>

<ul style="list-style-type: none"> • More housing sites should be identified. • The new housing will not be for local people. • It is in a noisy location close to the bypass. • The land acts a buffer to the effects of the A41 bypass. • Development should be directed to Hemel Hempstead industrial areas instead. • Options 1 and 2 are unacceptable. Development should be limited to minor sites within the town boundary. • Berkhamsted should keep its market town character. 	<p>Sufficient and appropriate sites have either already been identified or assumed for.</p> <p>Comment noted, no action required. In reality the housing would be available for a mix of both local people and new residents to the town.</p> <p>Comment noted, no action required. The site is well screened and at a reasonable distance from the A41 to ensure a suitable buffer and environment for future residents.</p> <p>Comment noted, no action required. The Core Strategy already assumes a significant contribution to housing in and around the Maylands Business Park.</p> <p>Comment noted, no action required. See responses to Questions 9 and 10. The bulk of development is sought within the existing town boundary.</p> <p>Comment noted, no action required. The modest size of the proposal and the fact that the bulk of development will take place within the existing town boundary, will help retain its market town character. However, the town should still accommodate some</p>
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<ul style="list-style-type: none"> • More space should be left for drainage otherwise it will result in flooding. • The lack of public transport to serve the housing scheme, its distance from the town centre and ridge top location, and the number of proposed homes will lead to congestion and traffic, pollution and safety problems for a variety of users on surrounding local roads. • Access onto Shootersway will be difficult and it will have a detrimental impact on the Shootersway / Kingshill Way junction. It should be taken from Dennys Lane and a roundabout might help the situation. • The site might have merit if the capacity (together with the Durrants Lane site) was reduced. • The site is inappropriate for affordable homes and it is unclear who would qualify. 	<p>development given its size and role.</p> <p>Comment noted, no action required. The proposal will be required to have a suitable drainage scheme in place.</p> <p>Comments noted, no action required. The site is in a reasonably accessible location given the lack of suitable and alternative sites on the edge of the town. The proposal will have to ensure that road improvements are in place to serve the development and which limit its impact on the local highway and other road users. The developer will have to work with the Highway Authority in identifying the most appropriate highway solutions.</p> <p>Comment noted, no action required. It is important that a balance is struck between protecting local character and making efficient and viable use of land released from the Green Belt.</p> <p>Comment noted, no action required. This urban edge site is reasonably accessible for affordable homes. Those who would qualify will be dependent on the type and mix of affordable homes. Residents will generally be in housing need and</p>
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<ul style="list-style-type: none"> • The scheme will lead to the loss of green space, agricultural land, and Green Belt land. • The site should be used for allotments. • The development will impact on a local habitat /biodiversity and associated wildlife. <ul style="list-style-type: none"> • The Council cannot guarantee that a high standard of development will be achieved. The recent quality of building in the town has been poor. <ul style="list-style-type: none"> • The BFI site should be protected as it is a national archive which may need to expand. • The land should be used for or coordinated with, the expansion of the BFI rather than housing. <p><i>Individuals who supported the proposal made the following comments:</i></p> <ul style="list-style-type: none"> • The town and borough are without a local hospital. • Trains and parking at the station are very expensive. • It would be a consolidation of an existing residential area. • The site is well screened, has limited wildlife value, and is located relatively close to the bypass. • It is appropriate providing it does not encroach onto the Green Belt and preserves the skyline. However, 	<p>registered with a housing association or be on the Council's housing register.</p> <p>Comments noted, no action required. It is being released to meet local housing needs within the town. The scale of loss is modest and the land is not currently in agricultural use. It is not identified as being of high wildlife value. While there is a need for allotments in Berkhamsted, this is less urgent than meeting local housing need.</p> <p>Comment noted, no action required. The Council will seek a high standard of development through the Core Strategy (Chapter 11) from all allocations.</p> <p>Comments noted, no action required. See responses to Question 20.</p> <p>Comment noted, no action required. Hemel Hempstead has a local general hospital.</p> <p>Comment noted, no action required.</p> <p>Comments noted, no action required. Support acknowledged.</p> <p>Comment noted, no action required. It is</p>
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<p>the density is too high, it is located away from public transport, and it requires infrastructure improvements.</p> <ul style="list-style-type: none"> • There is insufficient infrastructure in the town to support the housing. • If the site is developed then the Durrants Lane site should be reduced by an equivalent amount. <p>Comments from landowners:</p> <p>Lucas Land and Planning support Option1 together with the early release of the site.</p> <p>Grand Union Investment:</p> <ul style="list-style-type: none"> • This site represents unsustainable and sporadic development which is contrary to central planning policy guidance. • Land to the south of Berkhamsted should be considered to accommodate the local housing need. • The site lacks the critical mass to meeting the future housing needs at Berkhamsted. • It should be deleted. 	<p>important that a balance is struck between protecting local character and making efficient and viable use of land released from the Green Belt in a reasonably accessible location. The proposal will have to address its impact on the locality and the town in terms of the type, level and timing of infrastructure. It should not impact on the skyline.</p> <p>Comment noted, no action required. The evidence base to the Core Strategy suggests the town can accommodate additional housing.</p> <p>Comment noted, no action required. The level of housing on the Durrants Lane site is dealt with under Question 18.</p> <p>Comment noted, no action required. The release of the site will be guided by Policies CS2, CS3 and CS17.</p> <p>Comments noted, no action required. This is a modest scale of development in a reasonably accessible location that will contribute towards meeting local housing needs of the town. The option of using other</p>
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	land south of Berkhamsted has been considered in the published Assessment of Strategic Sites and Local Allocations. It is not a preferred location.
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QUESTION 20

The British Film Institute (BFI) is next to Hanburys. In order to survive, the BFI will need to invest and expand its uses. To what extent do you think the Council should support the BFI?

Responses received 191

Yes - Key organisations 2
 Individuals 65
 (62 from Berkhamsted)
 Landowners 1
Total 68 responses

No clear answer:
 Key organisations 2
 Individuals 12
 Landowners 0
Total 14

No - Key organisations 0
 Individuals 109
 (108 from Berkhamsted)
 Landowners 0
Total 109 responses

Response	Actions
<p>No organisations disagreed.</p> <p>Organisations who neither agreed or disagreed made the following comments:</p> <p>Berkhamsted Town Council (Cllr Stevens):</p> <ul style="list-style-type: none"> Housing development is not desirable and will only undermine the longer term role of the site. <p>Organisations who agreed made the following comments:</p> <p>Berkhamsted Town Council:</p> <ul style="list-style-type: none"> Accepts limited development of the BFI site that is necessary to ensure the continued survival of the organisation. <p>Friends of the Earth:</p> <ul style="list-style-type: none"> Support the proposal to extend the BFI, as it has an important role in supporting the British film industry. <p>Individuals who neither supported or objected stated the</p>	<p>Comment noted, no action required. No housing is planned for the site.</p> <p>Comment noted, see action points below.</p> <p>Comment noted, see action points below.</p> <p>Comment noted, no</p>

<p>following:</p> <ul style="list-style-type: none"> • Profit from unwanted development at Hanburys should not go to subsidising the BFI. • The expansion can be pursued without the need for development at Hanburys. • This should not be done by building homes as enabling development. • The town should welcome BFI as a significant employer. • BFI should take a more active role in the community. • The Council could consider funding some educational resource on the site. • Taxpayers' money should not be used to support the BFI unless there are direct benefits to the town. • They should secure lottery funding. • Limited development around the building's entrance is acceptable. • Support expansion but only within the constraints of the site. • Further development will destroy more Green Belt, increase traffic congestion and overload infrastructure. 	<p>action required. Development at Hanburys will not be subsidising the BFI. The Core Strategy is not promoting housing on the BFI site.</p> <p>Comment noted, no action required. Support for BFI noted.</p> <p>Comment noted. The BFI is an important asset to Berkhamsted. Stronger cultural and community links should be encouraged with the town. Amend para. 22.11 to refer to this.</p> <p>Comment noted. The Council has made no commitment to giving the BFI financial support.</p> <p>Comment noted, no action required. The Core Strategy is not intending any outward expansion of the site. It will allow for modest infilling between existing buildings which is unlikely to have a significant impact on the Green Belt, traffic and local infrastructure.</p>
<p>Individuals who disagreed made the following comments:</p> <ul style="list-style-type: none"> • No further development should be allowed. • Further development will destroy more Green Belt, impact on the character of the town, lead to the loss of wildlife habitat and agricultural land, increase traffic congestion and overload existing infrastructure in the town. • The Council should facilitate reasonable develop- 	<p>Comments noted, no action required. See response above to the extent and type of development supported by the Core Strategy. BFI have specialised building requirements</p>

<p>ment requirements within the existing site boundaries/through existing facilities.</p> <ul style="list-style-type: none"> • No more development should be supported as the site lies in the Green Belt. It will set a precedent for for development of land lying between the town boundary and the A41 bypass. • BFI could make better use of existing buildings. Modern technology will result in less building space being needed. • BFI should take care of itself using its own budget and land. This could involve the establishment of a visitors centre. • It is not the Council's role to financially support a government funded enterprise. They should be financially independent. The local community should be the priority for Council funding. • It is unclear what type of support is envisaged. • The Council should only provide strategic and not financial support. • Other sources of funding should be sought e.g. Lottery Funding. • Financial support to BFI by the Council should be commensurate with BFI's financial support of the local community. • Any support should not be done at the expense of building inappropriate housing development. • There are no guarantees that the BFI will remain on the site after any development occurs. • Development should go elsewhere (e.g. Hemel Hempstead employment area) especially if there is better public transport. • The Council is incapable of securing high quality housing development. • The question is poorly drafted. • The Council should enter into discussion with the BFI for the benefit of the town. • The BFI makes no or little contribution to Berkhamsted. • The BFI is an important cultural and historic service, and provides local employment. 	<p>and cannot simply reuse any building.</p> <p>Comments noted, no action required. See also action points regarding providing policy support only above. It is a matter for the BFI which funding sources it seeks.</p> <p>Comments noted, no action required. The Core Strategy is not promoting housing on the BFI site.</p> <p>Comment noted, no action required. The question allowed for an open response.</p> <p>Comments noted, no action required. The BFI does make a contribution to Berkhamsted, helping to show films at the Rex cinema and allowing visits to its site. However these links can be</p>
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<ul style="list-style-type: none"> • The BFI should move to an alternative site. • There are no guarantees that the BFI will remain on the site after any development occurs. <ul style="list-style-type: none"> • The interests of the BFI should not override the wider interests of the community. <p><i>Individuals who supported the approach gave the following reasons:</i></p> <ul style="list-style-type: none"> • The BFI is an important and unique local and national resource and should be assisted to remain on its present site. • Only if this involved limited / infill development within the site. • The BFI should be more involved with the community. • They should be supported but not through any housing development within the site or on Hanburys. • Further development will destroy more Green Belt, increase traffic congestion and overload infrastructure. • They need to provide a comprehensive and sensitive approach offering additional employment opportunities. • Support expansion within the constraints of the existing site. This could involve the creation of a visitors centre or museum. • They should be supported as a local employer who also utilise the services of local suppliers and contractors. • The BFI provides a regular source of film material to the Rex Cinema. • The buildings on the site are low in quality and 	<p>strengthened.</p> <p>Comments noted, no action required. The Council wishes to support the activities of the BFI to help them remain on the site. It is unlikely that it would wish to move following investment in specialist equipment and new buildings.</p> <p>Comments noted, no action required. The Core Strategy takes a balanced approach to the extent of support it can offer given its sensitive Green Belt location.</p> <p>Comments noted, no action required. See related responses above to:</p> <ul style="list-style-type: none"> • extent and type of development; • type of support sought; • development at Hanburys; • encouraging a greater community involvement; and • support for BFI to remain on the site. <p>Support for current activities and existing community role of BFI acknowledged.</p>
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<p>should be improved.</p> <ul style="list-style-type: none"> • The Council should only provide strategic and not financial support. • The BFI should be allowed to expand instead of development of the Hanburys site. • The BFI should move to an alternative site. • • Priority should be towards providing assistance to the BFI before the Egerton Rothesay School. • The land is a better site for replacing some or all of the housing at the Egerton Rothesay School site. <p>Landowners</p> <p>Grand Union Investment:</p> <ul style="list-style-type: none"> • The British Film Institute (BFI) facility is important due to the Institutes' nationally recognised work and their role as a key local employer. • The expansion of their facility is considered appropriate in principle. 	<p>Comments noted, no action required. The Council believes that both sites deserve support on planning grounds.</p> <p>Comments noted, no action required. Support acknowledged.</p>
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QUESTION 21

Do you consider that the Local Allocation LA5 (New Road, Northchurch) is appropriate either to provide new homes or to help fund the delivery of a road link from New road to Springfield Road?

Responses received 327

Yes - Key organisations 0
 Individuals 22
 (inc. 2 duplicates)
 Landowners 1
Total 23 responses

No clear answer:
 Key organisations 1
 Individuals 1
 Landowners 0
Total 2

No - Key organisations 8
 Individuals 293
 (286 from Berkhamsted)
 Landowners 1
Total 302 responses

Response

Actions

Organisations

Berkhamsted Youth Town Council:

- The construction of a link road will not alleviate traffic problems. It will simply worsen them on New Road.
- There is insufficient information to make an informed comment about the development although the location is not ideal.

Following further consideration and in the light of conclusions in the link road feasibility report, the Council decided to:

- Remove reference in the Core Strategy to the need to complete the link road and any association with Local Allocation LA5 housing site to help fund the link.
- Refer instead to the need for highway safety measures around St Mary's School and at the junction of New Road with the High Street.
- Refer also to progressing highway safety and

<p>Berkhamsted Transition Town:</p> <ul style="list-style-type: none"> • The link road should be removed from the core strategy. • Northchurch should consider other options such as imaginative road design, HGV restrictions, cycle lanes, pedestrian crossings, speed bumps, soft landscaping, a public square outside the shops, new road surfacing, etc. • Making road transport easier in any way will only generate traffic. • In an attempt to solve one traffic problem (in Northchurch High Street) we risk creating a much larger nuisance to residents and schoolchildren in the Chiltern Park, Bridgewater and Ashridge estates. • There is nothing positive that would come from implementing this scheme. • We endorse the town Council's statement on this, and request that the scheme should be removed. <p>Chilterns Conservation Board:</p> <ul style="list-style-type: none"> • Objects to the link road and the housing allocation. • The housing would almost certainly have a 	<p>environmental issues along New Road / High Street through air quality management measures and the Berkhamsted Urban Transport Plan.</p> <ul style="list-style-type: none"> • Remove reference to Local Allocation LA5 Land at Lock Field, New Road. This site is not assumed in either the option 1 or option 2 housing figures. • See also response to Banner Homes to Proposal LA5. <p>All subsequent comments take into account these action points.</p> <p>Comments noted. See response and action points above.</p> <p>Comments noted. See</p>
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<p>detrimental impact on the setting of the AONB.</p> <ul style="list-style-type: none"> • The link would have a significant detrimental impact on the Chilterns AONB. <p>Nettleden with Potten End Parish Council:</p> <ul style="list-style-type: none"> • The wider implications on traffic movements have not been considered. • The route from Northchurch/Berkhamsted to Hemel Hempstead will be via Potten End and traffic flows will increase further. <p>Friends of the Earth:</p> <ul style="list-style-type: none"> • Supports Option 1 which gives a more balanced approach and gives greater protection for the green belt and green infrastructure in Northchurch. • The proposed housing is far too close to Ashridge and Northchurch common and, therefore, cannot be supported. <p>Hertfordshire Biological Records Centre:</p> <ul style="list-style-type: none"> • The completion of the new link road will further degrade the final remaining area of chalk grassland which has otherwise been completely lost over the last 25 years. • Any realisation of these proposals must fully consider the future management of what remains and the potential translocation of destroyed habitat. • Retention / re-creation of Wildlife Site grassland and associated fauna. <p>The National Trust:</p> <ul style="list-style-type: none"> • The independent Planning Inspector to the last Local Plan Inquiry reported that this site was inappropriate for housing. • To develop this land for housing would be contrary to PPS7 and PPS1 as it would both harm the setting of the AONB and detract from the character of the existing settlement. • The physical works involved under option 3 of the new link road feasibility study will have a seriously intrusive impact upon the rural aspect and the 	<p>response and action points above.</p> <p>Comments noted. See response and action points above.</p> <p>Comment noted. See response to Questions 9 and 10.</p> <p>Comments noted. See response and action points above.</p> <p>Comments noted. See response and action points above.</p>
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<p>Chilterns AONB. These works will either be just inside the AONB or will be very close to the boundary of the AONB and will not secure the necessary conservation or enhancement of this nationally protected landscape.</p> <ul style="list-style-type: none"> • The feasibility report does not engage in any kind of detailed development appraisal upon which the development of 50 dwellings pays for a new road. To get to such a position would require the sacrifice of protection of the AONB. The National Trust would strongly recommend that the New Road link road and allocation LA5 are deleted. <p>Little Gaddesden Parish Council:</p> <ul style="list-style-type: none"> • This is not the correct location for a new road. A road will increase traffic volumes through the Chilterns AONB by creating a route from Ashridge to the centre of town and/or to the station, and threaten local attempts to reduce traffic and traffic speeds. <p>Berkhamsted Town Council:</p> <ul style="list-style-type: none"> • The site is not warranted. • It was ruled out by the Local Plan Inspector. • The scheme could not fund the link road and the level of affordable homes. • The link road is not supported as it would cause traffic congestion at the junction of Billet Lane and High Street, and increase traffic on Bridgewater Road and roads used by school children. • The uncertainty over the link road needs to be resolved. • Other traffic solutions along New Road should be investigated. <p>Individuals</p> <p>Individuals who did not support the approach gave the following reasons:</p> <ul style="list-style-type: none"> • No need for either the road link or the housing development. • Berkhamsted Town and Northchurch Parish Councils should work together to find a solution to 	<p>Comments noted. See response and action points above.</p> <p>Comments noted. See response and action points above.</p> <p>Comments noted. See response and action points above.</p>
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Northchurch's traffic problems.

- The road scheme should be removed from the Core Strategy.
- The link road will only shift the problem from one area to another, create a local rat run and undermine the semi-rural character of this part of the town.
- It is too late for the link road as it should have been completed when the Chiltern Park estate was being built.
- The new road would be to the benefit of a few residents in Northchurch at the expense of many more living in Berkhamsted.
- The feasibility study already makes the case for why the link road should not be developed: unsafe, costly, and environmentally disruptive.
- It is unnecessary, will impact on house prices, and is a waste of money.
- Springfield Road and other local roads are already too busy with cars and larger vehicles.
- It will increase the danger of accidents for school children, cyclists and other pedestrians.
- Billet Lane is already difficult to cross safely.
- It will lead to a local rat run through the Chiltern Park estate changing its character.
- The new road will create noise, pollution, congestion and junction problems on surrounding roads.
- The road proposal will increase traffic at the New Road/ High Street junction by St Marys School.
- It will encourage more traffic contrary to encouraging sustainable transport in the town.
- Traffic calming will have to be introduced at significant extra cost.
- Traffic problems in Northchurch need to be tackled separately.
- It will impact on the character and wildlife of Ashridge and Berkhamsted Common.
- Traffic should be diverted around the town and not through it.
- There is no need for further consultation as the link road feasibility study has already ruled out potential options.
- There are physical problems with the link road: it would be too steep because of the difference in elevation of existing roads, lead to poor visibility for

drivers, dangerous in icy weather, and difficult to drain.

- Road users should be discouraged from using the B4506 to Berkhamsted.
- It is important that residents on the Chiltern Park estate have pedestrian and cycle access to the countryside on the Ashridge side.
- Bridle Way and St Katherine's Way are narrow residential roads which are not suitable for any long or wide vehicles to pass safely.
- Bridgewater Road is not capable of accommodating additional traffic and will become a rat run. The existing traffic calming measures would not deter this happening.
- The funding of the link should have been a condition of the current unfinished development at the top of Springfield Road.
- There would be additional costs involved in improving existing roads to accommodate the traffic from the link road.
- The link road could prove attractive as part of a north-south short cut to M25 and M40.
- More consideration should be given to getting through traffic onto the by-pass.
- Introduce weight restrictions and traffic calming measures on the lower part of New Road so that heavy traffic will be forced to find alternative main routes.
- Springfield Road becomes difficult to use after any snowfall as residents tend to park their cars on-street.
- The Council should be considering more cost effective measures such as weight restrictions and traffic calming measures on the lower part of New Road. Heavy traffic will then be forced to find alternative main routes.
- More consideration should be given to getting through traffic onto the by-pass.
- The priority should be for a new link road to the A41 to link up a new junction to the north west of Berkhamsted to ease traffic problems from Dunstable.
- The New Road/Springfield Road link is required now because of both increasing levels of development and the congestion on the High Street in Northchurch, regardless of whether new houses are

built on the New Road site.

- The link road should be a high priority. Both the potential New Road development and the Egerton Rothesay School development should be required to make financial contributions to the link road construction and be conditional on the link road being built.
- As an alternative to the proposed Link Road the housing development at Lock Fields could provide a road that joins the A4251 to the west of Northchurch.
- More should be done to get car users to use alternative means of transport.
- It is unsustainable and will worsen its ecological and carbon footprint.
- The Local Transport Plan programme should at the very least include plans to tackle speeding along New Road if the link road does not go ahead.
- Businesses in Berkhamsted will be adversely affected by the link road.
- The priority should be to encourage traffic onto the bypass.
- The traffic diverted by the link road will simply be replaced by the residents from the proposed housing.
- The traffic problems in the town are due to excessive amounts of development permitted by the Council.
- The lack of parking on the Chiltern Park estate will result in overspill parking onto Springfield Road at the new link section.
- The link road and new homes is not necessarily dependant on each other, nor connected. They should be decided on their individual merit.
- The link road would be an improvement, but further housing development should not be used to fund it.
- Any monies saved from these developments can be used to improve the existing infrastructure within Berkhamsted.
- The link road and new homes should be contained within the same proposal.
- The proposed new homes should be removed from the Core Strategy.
- Object to the link road, but support the housing allocation.
- Too much housing development has already ruined

the character of the town.

- The housing represents gross over development. There already is sufficient housing in the town.
- Local utilities, health, educational and social infrastructure cannot cope with the housing. There is insufficient parking in the town.
- Existing infrastructure need to be sorted out first and improvements to new infrastructure actually implemented.
- It will lead to the loss of Green Belt in the CAONB, extend the boundary of the town, and impact on the setting of the Grand Union Canal and CAONB.
- Local wildlife will be lost.
- Sites within the existing town boundaries, particularly brownfield ones, should be developed.
- The aims of the planning requirements to the housing development are unrealistic.
- The space should be left for water drainage as more housing will result in flooding.
- The location is unsuitable for affordable housing.
- The Council is linking the link road to a housing development to simply hide the fact that there are no benefits stemming from the scheme.
- It is not clear how this proposed development will fund the delivery of the road link and whether it will be sufficient. There are no guarantees it will be delivered.
- Residents should have been better consulted over the proposal.
- Only residents in Northchurch will benefit from the link road, so by default they would have to support the housing development.
- There has not been any impact assessment.
- The new housing runs counter to the Core Strategy Vision as it will increase the number of cars on the road and result in the loss of open space.
- There may be scope for modest development on the site.
- The recently completed housing on New Road is of a poor quality of design.
- Development should not be considered until improvements to infrastructure are implemented, it is sustainable, and has no detrimental impact on the Green Belt and wildlife.

- The site is unsuitable in terms of rail noise and flood risk.
- Empty and unfinished properties should be used first along with housing in the industrial areas of Hemel Hempstead.
- The land is low lying and will be affected by natural springs that could be a problem for any development.
- The development could damage the high water table, pollute a natural water course, and affect it as a habitat for wildlife.
- No new housing in the town should be developed until higher design standards are achieved.
- Decision makers need to consult widely and with total transparency with all stakeholders.
- Poor control of developers has led to the link road not being completed.
- The pavements along New Road are too narrow for pedestrians.

Individuals who agreed made the following comments:

- The housing proposal will provide affordable homes and help fund the link road.
- There would be significant benefit to remove traffic from Northchurch, but not if it is at the expense of increasing housing and traffic in the area.
- The link road should be created as soon as possible though traffic should be directed down Billet Lane, rather than along Bridgewater Road.
- The housing will help delivery of the link road.
- New housing along New Road would reduce the burden on the Green Belt elsewhere in the town.
- The new housing should only be developed if needed, but not to fund the road link.
- New housing is supported, but only if of a high quality of design.
- The link road is welcomed, but subject to traffic calming, pedestrian safety, directing traffic away from Bridgewater Road, and parking control along Springfield Road.
- Properties on Springfield Road will not be affected greatly by the link road.
- The properties most affected will be those to be

Comments noted. See response and action points above.

constructed as part of the new development and those owners will be entering into their purchase fully aware of their position on a link road.

13 individuals agreed but did not comment.

Landowners

Landowners who disagreed made the following comments:

Grand Union Investments:

- This site is considered unsustainable for the reasons identified in Saville's Alternative Site Assessment document.
- Land to the south of Berkhamsted is the most appropriate site at Berkhamsted and should therefore be considered to accommodate the demonstrable local housing need identified in the response to question 9 and 10.
- LA5 site is considered to lack the critical mass potential to assist in meeting the future housing needs at Berkhamsted. Its development represents unsustainable, sporadic development which is contrary to central planning policy guidance.
- The site should be removed from the draft Core strategy.

Landowners who agreed made the following comments:

Banner Homes Limited:

- The land off New Road presents the opportunity to provide approximately 50 new dwellings, including affordable for new households in Berkhamsted.
- They support the potential to limit the availability of the affordable homes to prioritise local people.
- The site could deliver an important contribution towards meeting local housing need.
- The site has significant advantages, which makes it favourable to come forward for residential development. These include clear defined site boundaries and close proximity to primary school and the local centre of Northchurch. In addition, the site is not remote from the town centre and its development would sit well within the existing built

Comments noted. See response and action points above.

Comments noted. Refer to earlier action points above and to responses to Questions 9 and 10. The site is no longer needed to fund the New Road / Springfield Road link, and was rejected as a housing site by the previous Local Plan Inquiry Inspector. In the light of decisions on housing issues in the Borough, particularly with respect to the need

form of the settlement.	for specific local allocations, and given adequate housing supply within the town Proposal LA5 should be deleted.
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QUESTION 22

Accepting your answer to the previous questions about Berkhamsted, do you support the approach to 'Berkhamsted Place Strategy' set out in Section 22?

Responses received 247

Yes - Key organisations 4
 (inc. 1 duplicate)
 Individuals 11
 Landowners 2
Total 17 responses

No clear answer:
 Key organisations 0
 Individuals 2
 Landowners 0
Total 2

No - Key organisations 4
 Individuals 223
 Landowners 1
Total 228 responses

Response

Actions

Key organisations who disagreed made the following comments:

Berkhamsted Youth Town Council:

- Support most areas of the strategy such as the two new primary schools.
- The strategy has very few active points to improve facilities for sustainable travel, which could be a real solution to the traffic and parking problems in the town.
- Oppose the building of new houses before the construction of new schools and several other issues are addressed, as there is already a deficit of facilities and infrastructure in Berkhamsted. It is these things that must be resolved to maintain the quality of life enjoyed in the town.

Many of the comments repeat issues already raised under responses to Questions 18 to 21.

Please see responses and action points to original questions (Questions 18 to 21).

Support for new schools welcomed. Sustainable transport will be encouraged through Policies CS8 and 9 and through specific requirements in the housing allocations. It will also be promoted through the Local Urban Transport Plan. New development will have to support new infrastructure in the town in accordance with Policy CS35 and school expansion is already being planned for. No action required.

<p>Berkhamsted Town Council:</p> <ul style="list-style-type: none"> • The approach to building quantum and densities in Berkhamsted differs markedly from Tring and Kings Langley: prospective numbers are about 500 above those needed to maintain population. • Furthermore, maintaining the character of local areas appears to be overtaken by subtle changes to prospective densities with Urban Assessment whereas current Character Assessments should be retained and convey the higher priority. <ul style="list-style-type: none"> • Do not support the Place Strategy (see previous comments to Questions 18 to 21). 	<p>Comments noted, no action required. The suggested level of housing reflects the availability of housing land and the size and role of the town. The Urban Design Assessment is being updated and greater clarity regarding densities will be included (see response to Question 5 (Policy CS11)).</p> <p>Comment noted, no action required. See responses to Questions 18 to 21.</p>
<p>Hertfordshire County Council (Archaeologists):</p> <ul style="list-style-type: none"> • Reference should be made to the archaeological heritage of the town. It is both a material constraint on development and provides opportunities for enhancement and community engagement. 	<p>Comment noted. The Council acknowledges the importance of the archaeological heritage. Amend Place Strategy to refer to this.</p>
<p><i>Key organisations who agreed made the following comments:</i></p>	
<p>Friends of the Earth:</p> <ul style="list-style-type: none"> • Place Strategy only supported if Housing Option 1 prevails. 	<p>Comment noted. See Questions 9 and 10.</p>
<p>Chilterns Conservation Board:</p> <p>The Board welcomes the reference to the need to take opportunities to de-culvert the river through Berkhamsted.</p>	<p>Support for de-culverting welcomed.</p>
<p>Hertfordshire County Council (Property) supported the Strategy but did not make any additional comments.</p>	<p>Support welcomed.</p>

<p>Two individuals gave no clear answer with only one responding as follows:</p> <ul style="list-style-type: none"> • Provision for increased infrastructure services should be made before development takes place. • Development should be contained within existing town boundaries and that maintains the character of the town. <p><i>Individuals who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • The infrastructure, utilities and services in the town (e.g. water, sewerage, roads, parking, school places, doctor’s surgeries, public transport etc.) are at capacity and insufficient to support existing and future development. • Provision for increased infrastructure services should be made before development takes place and should be a pre-requirement for planning authorisation. • The Core Strategy does not provide sufficient information to make an informed decision as to whether the proposals are appropriate or sustainable. There appear to be no concrete plans regarding infrastructure and service provision. • Development should be contained within existing town boundaries, with consideration to maintain the character of the town and the Green Belt. • The priority should be to raise the quality of existing facilities and infrastructure. • The plans to avoid detrimental effects to the historical and environmental nature of the town are vague and should be properly considered before going ahead with any development. • Any new housing development should only be contemplated where the proposals are in keeping both with the style and density of existing 	<p>Comments noted, no action required. See responses to Questions 18 and 19.</p> <p>Comment noted, no action required. See responses to Questions 18 and 19.</p> <p>Comments noted, no action required. A Sustainability Report accompanies the Core Strategy. This sets out the impact of policies and proposals on the environment. It does not identify any significant adverse effects.</p> <p>Comments noted, no action required. See responses to Questions 18 and 19.</p> <p>All development proposals would be expected to accord with Policy CS27 Quality of the Historic Environment.</p> <p>Comments noted, no action required. The Core Strategy aims to balance character with</p>
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<p>neighbourhoods.</p> <ul style="list-style-type: none"> Proposals to build in Berkhamsted would be better accommodated in Hemel Hempstead which has much better infrastructure Additional housing does not stem from the needs of the town residents, but instead from a desire for further profit for the developers in the area, without any consideration for its adverse impacts on the residents. Any more development is unacceptable considering the excessive development that has taken place over the last 15 years. Development, including housing, will ruin the historic and market town character of the settlement. The number of new houses proposed is unrealistic. The proposed level of homes is excessive and should be reduced. Berkhamsted does not need to expand. The housing level set for the town is based on outdated and no longer relevant data. What is this evidence that so many houses are needed? Berkhamsted is being treated differently from other market towns in the Borough in relation to the number of new homes proposed. Just because it is the second largest town in the Borough does not mean it should be subject to the second highest amount of development. Housing numbers should be based on future need, current population and space available in the town. The density figure for new build proposals is over double that for the existing build in the town. 	<p>making the efficient use of land.</p> <p>Comments noted, no action required. Hemel Hempstead will accommodate a significant level of development. It is important to ensure an appropriate distribution of new homes across the borough.</p> <p>Comments noted, no action required. There is a need to meet locally generated housing need from the town. New housing will be required even if the existing population remained static because of falling household size.</p> <p>Comments noted, no action required. See responses to Questions 18 and 19.</p> <p>Comments noted, no action required. See responses to Questions 18 and 19. The level reflects housing land availability and the size and role of the town.</p>
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<ul style="list-style-type: none"> • Neither housing Option 1 nor Option 2 is supported. The linear nature of the town, constrained by the topography of the Bulbourne Valley, reduces the sustainability of any new development beyond the town's present boundary. • Any plan for Berkhamsted should be made in the context of the geography of the town – lying as it does in a valley – that constrains the areas for natural development. • The placing of any new schools in the Green Belt is opposed (para.22.4). • The proposed school expansion will only be sufficient to serve the existing population and not any expansion of the town. • Council needs to put together a holistic plan for developing Berkhamsted incorporating not just housing but work, travel and leisure also. • The water usage by residents of the new homes will adversely affect the River Bulbourne. New building should not occur without a new source of water. • The promotion of travel by non car use and protecting open space and providing more space cannot be achieved through building new homes on the edges of the town or on existing areas of open space. 	<p>Comments noted, no action required. See responses to Questions 9 and 10 in terms of housing options and 18 and 19 in terms of the impact of new housing on the edge of the settlement.</p> <p>Comments noted, no action required. New schools are required to meet future demand for school places in the town. There are no available urban sites. The level of additional provision is supported by Herts County Council.</p> <p>Comments noted, no action required. This is what the Place Strategy seeks to achieve.</p> <p>Comments noted, no action required. The evidence base to the Core Strategy does not point to fundamental concerns over water supply in relation to levels of housing proposed in Berkhamsted. Policy CS29 (Sustainable Design and Construction) seeks to limit indoor water consumption in new developments.</p> <p>Comments noted, no action required. See responses to Questions 18 and 19.</p>
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<ul style="list-style-type: none"> • The proposals in the Place Strategy undermine the transport strategy set out under para. 22.12. • The proposal is contrary to promoting “non-car use”. • The proposals for housing at land at Durrants Lane and New Road will lead to the loss of local wildlife (e.g. bats.) and their habitat (e.g. chalk streams). • The Durrants Lane proposal does not accord with the Vision Statement for Berkhamsted. Will seriously affect the character of the area. Homes should not be built on the ridgetop. The town’s development ought to follow a linear pattern along the valley floor. • The Shootersway/Durrants Lane area is not suitable for development. It cannot cope with further traffic as roads are already too narrow with no space for widening either the single pavement or the road. • Too many homes are proposed on the Egerton Rothesay School/Durrants Lane site. • Disagree that the Durrants Lane site’s development will secure additional informal open space and playing fields (para 22.7). • Rejection of the Blegberry Gardens site for housing on traffic grounds apply equally to the Durrants Lane site. • The housing classification for the ERS site should not be changed from peripheral to semi-urban as the developer is proposing. • The previous views of residents have not been properly taken into account. The Place Strategy does not focus on addressing the needs of the current Berkhamsted population. No account has been taken of negative public opinion to the Emerging Core Strategy. • Only once improvements are implemented should further building be considered and then only if the development is sustainable, has no detrimental effect on the Green Belt and wildlife, and does not compromise the Chilterns Area of Outstanding, Natural Beauty. • Traffic congestion in the town needs tackling. 	<p>Comments noted, no action required. See responses to Questions 18.</p> <p>Comments noted, no action required. See response to Question 18. New development will provide for new family homes, affordable housing, additional open space and new infrastructure.</p> <p>Comments noted, no action required. See also responses to Questions 18, 19 and 21. No development is proposed in the Chilterns AONB.</p> <p>Comments noted, no action required. Traffic</p>
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<ul style="list-style-type: none"> Local allocations are not needed as there is sufficient supply of urban land for housing. No new supermarket and car parking are necessary in the town centre (para. 22.9). A supermarket would destroy the few small shops that remain in the town. Visitors like small shops. The road between Costa and Tesco should not be closed as this will increase congestion. There are more residents in the High Street than in many of the so called residential streets such as Charles Street or Hall Park Avenue. High Street residents are largely ignored at present. Before making the High Street more congested thanks to new developments and approving new supermarkets, councillors should consider impact on the quality of life of these residents. Maintaining a baseline level of jobs in Berkhamsted is supported. 	<p>issues will be considered through the Local Urban Transport Plan and through the application of Policy CS8.</p> <p>Comments noted, no action required. Local allocations can supplement housing supply and provide greater opportunities to secure family homes and affordable housing.</p> <p>Comments noted, no action required. The new supermarket would replace an existing store. It seeks to improve the vitality and viability of the town centre as a whole. This would also be an opportunity to improve parking in the town centre.</p> <p>Comments noted, no action required. The reasoning for the road closure is dealt with in the published Feasibility Study and Concept Statement for the new foodstore.</p> <p>Comments noted, no action required. The Council has to strike a reasonable balance between safeguarding the amenity of residents and maintaining the vitality and viability of the High Street.</p> <p>Support welcomed.</p>
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<ul style="list-style-type: none"> • Development on the BFI site (para. 22.11) is supported as long as this is contained within its existing footprint and limited to development which is directly linked to its business not housing development to raise funds. • Proposals details the development of 300 new homes but it is entirely unclear where the remaining 800-900 will be built. • The Strategy will not achieve the Vision. • The proposed multi-storey car park in Water Lane would ruin the character of the town centre and not respect its heritage. • There needs to be added car parking in the Place Strategy. This is important for the prosperity of businesses in the town. • Berkhamsted Town Centre will die if there is insufficient parking and congested roads. It is much easier to shop elsewhere. • There is no provision in the Berkhamsted Place Strategy to protect the natural environment for wildlife and recreation. • The New Road/Springfield Road Link needs to be cancelled as its delivery is not of high local importance. • Link Road proposal supported in principle but would 	<p>Comments noted, no action required. See responses to Question 20.</p> <p>Comment noted, no action required. The level of housing in the town is made up of a mix of identified sites (e.g. those with planning permission) and a smaller amount of assumed sites where the location is not known.</p> <p>Comment noted, no action required. The objectives and proposals of the Strategy will help achieve the Vision.</p> <p>Comments noted, no action required. There are limited opportunities to accommodate new parking spaces within the historic centre of the town. No multi-storey car park is proposed at Water Lane.</p> <p>Comments noted, no action required. The Vision together with the wider policies in the Core Strategy are committed to safeguarding the natural environment.</p> <p>Comments noted, no action required. See responses and action points to Question 21.</p>
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<p>like to see figures to show expected usage and what the plans for the New Road area are as this could potentially be affected by the proposal.</p> <ul style="list-style-type: none"> • There is only one access to the New Road development. The canal bridge on New Road is not suitable to support a significant increase in traffic. • It would also result in vastly increased risk to the safety of children and elderly people. Furthermore, it would negatively impact Beeches woodland and Northchurch common which are important wildlife habitats. • Improved cycle routes will not ease traffic volumes. Many of the town's roads are steep and narrow and very dangerous for cyclists. • Not one of the proposed developments is within walking distance of the shops and other services. They will generate much more traffic exacerbating congestion and parking issues in the town centre. • Berkhamsted is a commuter town. More development means more commuters. • Instead of squeezing such a high volume of housing into tiny pieces of land go for smaller developments which enhance the surrounding areas. Alternatively build a whole development on one big site that can be properly planned. • Berkhamsted Council should be given its own rights over planning, independent from Dacorum. 	<p>Comments noted, no action required. Cycling can contribute to replacing some shorter journeys by car, but accept that the topography of the town limits opportunities.</p> <p>Comment noted, no action required. See responses to Questions 18 and 19.</p> <p>Comment noted, no action required. The Council is seeking to safeguard local job opportunities. It is acknowledged that it cannot prevent residents living in the town and working elsewhere.</p> <p>Comments noted, no action required. The Core Strategy promotes a mix of sized housing sites. See also responses to Question 18 and 19.</p> <p>Comments noted, action required. This is not a Core Strategy matter.</p>
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<ul style="list-style-type: none"> • New housing should be affordable. • 1200 new homes is too few. 1600 should be built. • Northchurch is still subordinated under Berkhamsted, even though it is a separate Parish. This should be changed for future rounds of consultation. • Proposals to build two new primary schools welcomed. But also need secondary schools. • The traffic problems in the town centre could be improved if Waitrose made it possible to exit at the Lower Kings Road end of their car park. • No further building should take place in Berkhamsted as the Council is incapable of approving well designed buildings. 	<p>Comments noted, no action required. The Core strategy seeks 35% of all new development should be affordable. This figure will be higher in some larger identified sites. See also responses to Question 10.</p> <p>Comments noted, no action required. See responses to Questions 9 and 10.</p> <p>Comments noted, no action required. It is appropriate to consider the settlement as a whole to ensure a coordinated planning approach.</p> <p>Comment noted, no action required. The County Council have not advised that a new secondary school is required within the town.</p> <p>Comment noted, no action required. This is not a Core Strategy matter.</p> <p>Comment noted, no action required. See responses to Questions 18 and 19. The Core Strategy promotes high quality design through policies CS10-12.</p>
<p><i>Individuals who agreed made the following comments:</i></p> <ul style="list-style-type: none"> • All development in Berkhamsted should be of outstanding design. Developers should be held to account on this issue. 	<p>Comments noted, no action required. The Core Strategy seeks to secure a high quality of</p>

<ul style="list-style-type: none"> • Housing development plans should be put on hold until there is a plan to make Berkhamsted the vibrant flourishing town it can be. The Council needs to encourage people to shop and socialise in Berkhamsted. • Green Belt losses should be minimised by increasing re-use of industrial sites and by permitted infill in other areas. • There should be absolutely no change to the decision not to build on the land adjacent to Blegberry Gardens. • To avoid overdevelopment on the Shooters Way/Durrants Lane site, other suitable and sustainable sites should also be considered where there would be no harm to the Green belt. One such suitable site is land at Ivy House Lane (SHLAA Ref: BC14). <p>Landowners who disagreed made the following comments:</p> <p>Grand Union Investment:</p> <ul style="list-style-type: none"> • For the reasons explained in the response to Question 9 and 10, the Place Strategy for Berkhamsted is considered to be unsound due to principal lack of consideration of the real housing needs for the town and how they should be met. • It is recommended that land to the south of Berkhamsted is identified as a strategic site and local allocation and that all policy recommendations proposed in relation to draft policy CS17 and its supporting draft text. <p>Landowners who agreed made the following comments:</p>	<p>development. The Core Strategy promotes high quality design through Policies CS10-CS12.</p> <p>Comments noted, no action required. The Core Strategy and Place Strategy seek to achieve these aims.</p> <p>Comments noted, no action required. The Core Strategy already encourages this.</p> <p>Comments noted, no action required. Support welcomed for not identifying the site as an allocation.</p> <p>Comments noted, no action required. The Core Strategy identifies sufficient and appropriate land for housing.</p> <p>Comments noted, no action required. See responses to Questions 18, 19 and 21.</p>
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<p>Banner Homes Ltd:</p> <ul style="list-style-type: none"> • Figure 23 is incorrect. It does not illustrate the location of Land Allocation LA5 (New Road, Northchurch). <p>Governing Body Ashlyns School:</p> <ul style="list-style-type: none"> • Ashlyns site was being considered for housing but there is no mention of this in the Core Strategy. • If Ashlyns land were to be developed this would provide the funds to develop the state school and its facilities which would benefit Berkhamsted. 	<p>Comment noted, no action required. See responses to Question 21.</p> <p>Comment noted, no action required. The land was considered through the published Assessment of Local Allocations & Strategic Sites. The site is ideally located to meet longer term educational needs in this part of the town. It should be safeguarded for this purpose.</p>
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Tring

QUESTION 23

Do you consider that the Local Allocation LA6 (off Icknield Way, west of Tring) in Section 23 (which is in Housing Option 2) is appropriate to meet the long term needs of Tring?

Responses received 40

Yes - Key organisations 0
 Individuals 13
 Landowners 1
Total 14 responses

No clear answer:
 Key organisations 0
 Individuals 0
 Landowners 1
Total 1

No - Key organisations 7
 Individuals 10
 Landowners 8
Total 25 responses

Response

Actions

The Council decided to retain this local allocation to help meet the borough housing target and provide some homes locally. LA6 is self-contained with relatively limited impact on the Green Belt. The green gateway to the town (in the Chilterns AONB) would be retained and provide public open space. The site is next to employment and reasonably accessible to the facilities of the town. Other options have been considered - see the 'Assessment of Local Allocations and Strategic Sites' (October 2010). All options have their implications. On balance the Council concluded that this

<p>Organisation</p> <p><i>Organisations who have disagreed made the following comments</i></p> <ul style="list-style-type: none"> Hertfordshire County Council – Land to the East of Tring is much better served by the town centre, local shops, the secondary school, sports and recreational facilities and existing bus services, it is also closer to the station and is connected to better cycleways than Land to the West. The Sustainability Assessment concluded that Land to the West could increase car use and therefore emissions into the air and yet these assumptions were not made in respect of Land to the East. Land to the East is available for development if the Council wish to pursue this further. CPRE – LA6 is not appropriate. The reasons for this were set out in the emerging Core Strategy in 2009. Insight Town Planning - It is not the most appropriate Greenfield site. Land off Station road is more suitable because of its proximity to the railway station, and pedestrian and cycle path. Chilterns Conservation Board – If LA6 were developed there would be a significant detrimental impact to the adjacent AONB. Hertfordshire County Council - There should be an amendment to the 'principles' section of Local Allocation 6 to identify the fact that the residential development that is proposed should fund the delivery of the detached playing fields. 	<p>option was preferable, having least impact on the character of the town and its setting. Local community representatives expressed a preference for the Icknield Way site should a local allocation be required.</p> <p>This site was considered in the Emerging Core Strategy, but not preferred. Please see comments above.</p> <p>Comment noted.</p> <p>Comment noted. Site LA6 is the preferred location for the reasons set out in the published 'Assessment of Local Allocations and Strategic Sites.</p> <p>Delete word 'adjoining' in third bullet point under 'principles' in LA6 to clarify that no built development would occur in the Chilterns AONB.</p> <p>Comment noted. LA6 would deliver open space/playing fields and would be expected to contribute as any other site to infrastructure</p>
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<ul style="list-style-type: none"> • Friends of the Earth – We need greater support for maintaining the Green Belt. We support Option 1. • Tring Town Council – There is no requirement for the level of development in Option 2. <p><i>Organisations who have agreed made the following comments</i></p> <p>None</p> <p><i>Other comments from Organisations</i></p> <p>None</p> <p>Individuals</p> <p><i>Individuals who have disagreed made the following comments</i></p> <ul style="list-style-type: none"> • Why does Tring HAVE to have new large developments, like Berkhamsted, the town is bursting at the seams with inadequate roads and over development. • The land is in the Green Belt and therefore it should not be developed. • A supermarket needs to be provided to the west of Tring. Tesco & its car park are currently maxed out. M&S Simply Food was a welcome addition to the 	<p>delivery through financial contributions – most likely the community infrastructure levy.</p> <p>The comments of both organisations are noted. New housing sites are required to support the housing target and provide local homes. Also see response to Question 9.</p> <p>New housing sites are required to support the housing target and provide local homes. The scale of the new development proposed for Tring is appropriate for the future needs of the local population and does not raise any significant infrastructure issues. Also see response to Question 32.</p> <p>New housing sites are required to support the housing target and provide local homes. Therefore appropriate Green Belt locations must be considered.</p> <p>The retail update study (which takes into account housing growth)</p>
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<p>town centre but hardly counts as a supermarket. The doctor's surgery car park is too small. Highways improvements and access to a bus service would also be needed.</p> <ul style="list-style-type: none"> • This development will be an isolated island of development poorly related to the town and all facilities • I would prefer Option 1 but if that is not possible then I would support development at Land to the east of Tring at Dunsley. LA6 borders the AONB and is a green gateway into the town. • We support Option 1. • We have an interest in preserving this open area put forward in Option 2, historically the link between the northern and southern areas of our parish. • Development should be in Hemel Hempstead not Tring. 2 people stated that this development would be isolated and is at the wrong end of town for shopping and other facilities. 	<p>does not highlight any need to provide a supermarket at Tring. Highways issues will be considered in an Urban Transport Plan, which is prepared by the County Council. Passenger transport is also a County Council matter. No further action.</p> <p>This has been identified through detailed technical work as the most appropriate location. Further information set out in the 'Assessment of Strategic Sites and Local Allocations'. No further action.</p> <p>Both sites are considered green gateways and border the AONB. Site LA6 is considered the more appropriate location.</p> <p>Comment noted. No further action.</p> <p>See above.</p> <p>Hemel Hempstead will accommodate the bulk of housing development in the borough. However, it is important that all of the towns and large villages play a role to help ensure that the housing meets the needs of all residents – not just</p>
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<p><i>Individuals who have agreed made the following comments</i></p> <ul style="list-style-type: none"> • This site has been well considered as this is the only real suitable site for development. • Yes, but we need to improve existing infrastructure. <ul style="list-style-type: none"> • This is a logical extension of the town with longer term defensible boundaries. Traffic can access from Tring west interchange A41 without putting pressure on traffic through the town centre • Would like to see alternatives for location of Tring Secondary School detached playing fields and why these are really needed. 	<p>those in Hemel Hempstead.</p> <p>Support welcomed.</p> <p>Support noted. Infrastructure issues will be considered further through the Infrastructure Delivery Plan. The site itself will be expected to provide playing fields and open space. Contributions are also required towards local education and community facilities. See also response to Question 32 (Infrastructure). No further action.</p> <p>Support welcomed.</p> <p>Further work will be undertaken with HCC to investigate this matter. If a site is required this can be considered further through the Site Allocations DPD.No further action.</p>
<p><i>Other comments from Individuals</i></p>	
<p>None</p>	
<p>Landowner</p>	
<p><i>Landowners who have disagreed made the following comments</i></p>	
<ul style="list-style-type: none"> • Insight Town Planning – It is not the most 	<p>This site was ruled out</p>

<p>appropriate Greenfield site. Land off Station road is more suitable because of its proximity to the railway station, and pedestrian and cycle path.</p> <ul style="list-style-type: none"> • Grand Union Investments – We believe that because of environmental constraints that land to the south of Berkhamsted is more favourable than this Local Allocation. • Waterside Way Sustainable Planning Ltd – We consider that the SHLAA sites are unrealistic for delivery as a lot are in employment use. Tring should be aiming to accommodate natural growth and therefore 939 dwellings would be realistic to deliver on the Waterside Way Site. Although this site was discounted as a suitable option we believe it would create a strong relationship with the urban environment to the south and not to the countryside due north due to the site's sloping topography. <p><i>Landowners who have agreed made the following comments</i></p> <ul style="list-style-type: none"> • Cala Homes - I believe this site is unnecessarily constrained by Policies CS3 and CS17 and instead this site could and should be released for development as soon as possible. 	<p>as part of the Emerging Core Strategy process. The reasons for rejecting certain options were given on page 151 of that document. Further information is set out in the Assessment of Strategic Sites and Local Allocations. No further action.</p> <p>It is important to ensure an appropriate distribution of new homes within the Borough. Pursuing such a high level of development in Berkhamsted would not be meeting the needs of other settlements. See response to Question 19 regarding land to the South of Berkhamsted.</p> <p>Comment noted. SHLAA sites will continue to be addressed and monitored to check deliverability. Site LA6 is considered to be the more appropriate location following detailed assessment through the 'Assessment of Strategic Sites and Local Allocations'. No further action.</p> <p>It is considered appropriate to phase the release of sites over the Plan period to ensure a consistent housing supply and to ensure local infrastructure issues are addressed in</p>
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<p><i>Other comments from Landowners</i></p> <ul style="list-style-type: none"> • Trustees of Peter Williams - Our client owns a 1.5 hectare area of land located on Station Road, Tring. The site is roughly triangular in shape and has a strong landscape boundary to all sides. Development can sensitively be integrated with existing communities and the wider landscape setting. It would be compact with a high quality public realm with at least 50 dwellings. It is considered that the site would meet the criteria set out in Policy CS2 of the Draft Core Strategy 'Selection of Development Sites'. 	<p>a timely manner. See response to Question 3 regarding Policies CS2 and CS3.</p> <p>This site was considered through the Emerging Core Strategy and as part of the 'Assessment of Strategic Sites and Local Allocations'. Site LA6 was considered preferable for the reasons set out in these documents.</p>
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QUESTION 24

Do you support the approach to 'Tring Place Strategy' set out in Section 23?				
Responses received	33			
Yes -			No clear answer:	
Key organisations	3		Key organisations	0
Individuals	8		Individuals	0
Landowners	0		Landowners	1
Total	11 responses		Total	1
No -				
Key organisations	7			
Individuals	12			
Landowners	3			
Total	21 responses			
Response		Actions		
<p>Organisations <i>Organisations who have disagreed made the following comments</i></p> <ul style="list-style-type: none"> Hertfordshire County Council – Review the options for accommodating Tring's housing needs, in particular whether Housing Option 2 is the most appropriate and sustainable location for greenfield development at Tring. Choosing this site is at odds with the vision for Tring for improving accessibility to services and facilities. As a result of Hertfordshire County Council's assessment of school places in Tring it would be prudent to put in place appropriate open space policies that enable the expansion of Tring Shool should it be required, and to assist in delivery of new playing fields. There will be further discussions with HCC relating to the location of these playing fields and their location will be identified through the Site Allocation DPD. Hertfordshire Biological Records Centre – We support much of the vision, however Tring is unique in Dacorum if not the County in being surrounded by extant livestock and mixed farms. The vision should recognise the farming heritage of the countryside around Tring. Delivery section should include the maintenance of viable farming. 		<p>Comments noted. No further action. See response to Question 23. If required, new playing provision could still be made on the Dunsley Farm site, since such a use is acceptable within the Green Belt. Agreed that further discussions can take place as part of the Site Allocations DPD production.</p> <p>Comments noted. The Core Strategy cannot monitor/ maintain the level of viable farming land. The Countryside Strategy, which covers the land around Tring already, includes reference to supporting agriculture and farming. One of the reasons</p>		

<ul style="list-style-type: none"> • Tring Town Council – Option 1 figures are sufficient. • Tring Sports Forum - Tring Sports Forum requests that the strategy relating to Tring be reassessed in order to acknowledge, and respond to, the urgent and exceptional need for additional playing facilities in the Tring area. • Aylesbury Vale District Council - The Council is concerned that the potential allocation at West Tring may harm the setting and openness of this landscape and countryside. The other main concern is with regard to the potential increased vehicle movements into Aylesbury Vale on the B4009 Icknield Way and B4635 Aylesbury Road resulting from the potential West Tring allocation. There may need to be road junction improvements in proximity to Aylesbury Vale to accommodate increased growth. 	<p>Proposal LA6 was chosen over the Dunsley Farm site was the desire to maintain viable local farms in the area.</p> <p>Comment noted. No further action. See response to Question 9.</p> <p>See response to Question 11. Existing technical work does not indicate any additional and exceptional need for additional playing facilities in the town. Consideration is being given as to whether an update of technical work is required to inform the Site Allocations DPD. The Core Strategy already identifies a need for new playing fields and open space as part of proposal LA6 and in conjunction with any enlargement of Tring School. New social infrastructure (which includes leisure facilities is supported under Policy CS23). This policy supports the dual use of both new and existing facilities.</p> <p>Comments noted. No further action. Landscape and highway impacts have been considered as part of the 'Assessment of Strategic Sites and Local Allocations'. This is a modest scale development and issues, such as access, can be dealt with through the careful planning of the</p>
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<ul style="list-style-type: none"> • Sport England - would request that engagement takes place with Sport England before proposals are made for the location of detached playing fields due to our statutory consultee role. <p><i>Organisations who have agreed made the following comments</i></p> <ul style="list-style-type: none"> • Natural History Museum – no comment • Friends of the Earth – as long as Option 1 is chosen. <p><i>Other comments from Organisations</i></p> <p>None</p> <p>Individuals <i>Individuals who have disagreed made the following comments</i></p> <ul style="list-style-type: none"> • Do not use additional green belt land for sports facilities and associated parking. • If the detached playing field is necessary for Tring School there would be an obvious loss of privacy for the houses along Damask Close. There are concerns that agricultural land should be used for this purpose. • The land is green belt and therefore it should not be built on. 	<p>site.</p> <p>Comment noted. No further action.</p> <p>Both answers noted. No further action.</p> <p>Playing fields and ancillary facilities are considered as acceptable Green Belt uses under national policy.</p> <p>See above. If detached playing fields are provided careful consideration will be given to their layout to minimise the impact on local residents.</p> <p>National policy allows for Green Belt boundaries to be reviewed as part of the development plan process, should additional land be required to meet local housing needs.</p>
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<ul style="list-style-type: none"> • The building of houses and industrial units on land off ickniel way would create a large amount of traffic and noise pollution. How about development land to the east of Tring- some is unused and has been for years it would give easy access to Tring station. • 480 homes is too few, I suggest 600. • Revert to Option 1; this is sufficient for our housing need. Infrastructure and services of the town need to be checked to prepare for any small change in population growth. The Vision does not need to include, 'improved outdoor leisure facilities' when there is so much open space on our doorstep. • Tring has vast areas of underutilised sporting facilities such as Pound Meadow, therefore it is not necessary to place additional playing fields on Dunsley. • A supermarket needs to be provided to the west of Tring. Tesco & its car park are currently maxed out. M&S Simply Food was a welcome addition to the town centre but hardly counts as a supermarket. The doctor's surgery car park is too small. Highways 	<p>Alternative locations have been assessed as part of the Emerging Core Strategy and 'Assessment of Strategic Sites and Local Allocations' (Proposal LA6 was considered the most appropriate allocation for the town.</p> <p>Comment noted. No further action. The number of new homes proposed is considered to strike the right balance between meeting local housing needs and environmental considerations.</p> <p>Comment noted. Infrastructure provision has been considered through the Infrastructure Delivery Plan (see Question 32). It is important to ensure the town has appropriate formal leisure facilities in addition to informal recreational opportunities offered by the adjacent countryside. No further action.</p> <p>If Tring School is expanded there will need to be replacement playing fields for its students. No further action.</p> <p>The Retail Study update does not highlight any need for a new supermarket at Tring. Highway issues will be</p>
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<p>improvements and access to a bus service would also be needed.</p> <ul style="list-style-type: none"> • Review status of services and facilities required albeit many will be commercial i.e. supermarkets. Consider infrastructural mitigation opportunities within the proposed development. • Adopt Option 1, if that is overruled then allocate land to the east of Tring at Dunsley. Remove replacement of employment provision from LA6 if this has to be developed because there are too many vacant or underused premises at Icknield Way Industrial Estate. <p><i>Individuals who have agreed made the following comments</i></p> <ul style="list-style-type: none"> • I commend you and your colleague for a well considered, sensible and attractive development proposal to 2031. • What is missing is the need for improved indoor sports space as well as hard court outdoor facilities which meet NGB standards. As an example, there are no netball/tennis courts in Tring which meet the minimum NGB standards for local competition. Tring School may have its facilities increased by the addition of more outdoor pitches but there are a significant number of ladies and girls who cannot play their sport due to the lack of hard court surfaces. Tring School may be an ideal location for these. <p><i>Other comments from Individuals</i></p> <p>None</p>	<p>considered by the County Council through an Urban Transport Plan. Passenger transport is also a County Council matter. No further action.</p> <p>Technical studies supporting the Core Strategy have considered infrastructure provision. Also see response above regarding retail provision.</p> <p>Comment noted. Technical evidence supports the need for replacement employment space to ensure the town continues to provide an appropriate level of employment opportunities. No further action.</p> <p>Support welcomed.</p> <p>The Site Allocations DPD can consider the provision and quality of local indoor and outdoor sports facilities further. Policy CS23 (Social Infrastructure) supports the dual use of any new facilities. No further action.</p>
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Landowners

Landowners who have disagreed made the following comments

- Grand Union Investments - We believe that because of environmental constraints that Land to the south of Berkhamsted is more favourable than this Local Allocation.

- Insight Town Planning Ltd - 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.

- CALA Homes - Tring is approximately two thirds the size but is proposed to receive only around a third (depending on whether Option 1 or 2 is followed) of the amount of new housing as is allocated to Berkhamsted. The zero-net migration scenarios point to a need for 841-938 new dwellings during the plan period. As per my responses elsewhere, this is considered the minimum required to meet local housing needs.

Landowners who have agreed made the following comments

None

Other comments from Landowners

It is important to ensure an appropriate distribution of new homes within the Borough. Pursuing such a high level of development at Berkhamsted would not be meeting the needs of other settlements. See response to Question 19 regarding the land south of Berkhamsted. No further action.

This site was considered through the Emerging Core Strategy and as part of the 'Assessment of Strategic Sites and Local Allocations' (October 2010). Site LA6 was considered preferable for the reasons set out in these documents. No further action.

The amount of housing indicated for Tring is considered appropriate taking into account local housing needs, environmental considerations and the particular characteristics of the town.

- Trustees of Piers Williams - We support Option 2.

Comment noted. No further action.

QUESTION 25

Do you support the approach to ‘Kings Langley Place Strategy’ set out in Section 24?	
Responses received	22
Yes -	
Key organisations	5
Individuals	10
Landowners	0
Total	15 responses
No clear answer:	
Key organisations	0
Individuals	0
Landowners	2
Total	2
No -	
Key organisations	1
Individuals	3
Landowners	1
Total	5 responses
Response	Actions
<p>Organisations:</p> <p><i>Comments from organisations that disagreed:</i></p> <p>Hertfordshire County Council do not support the overall approach to the place strategy, although they do support some elements of it.</p> <ul style="list-style-type: none"> • They welcome the support for improvement to the secondary school’s facilities, but ask for this to be extended to the primary school’s facilities, which may require new/improved facilities over the life of the plan. As the primary school is designated as open land, they request that an appropriate criteria is added to allow for expansion of school facilities if required. • They note that the secondary school have identified the need for a new sixth form block and request that the Core Strategy acknowledges the need for enabling development to help fund new development at the secondary school. • They request that the infilling boundaries of the Major Developed Site in the Green Belt at the secondary school are re-drawn. 	<p>Whilst it is acknowledged that there may be a need to improve the primary school facilities at some stage during the plan period, no specific needs have been identified. A change to the local objectives is therefore not appropriate. Additional facilities for schools within open land areas are already permissible under existing policies, provided there is sufficient evidence of need. No change required.</p> <p>Comment noted, no action required. The Council does not feel that enabling development for a new sixth form block is justifiable in the location proposed by the County Council (HCC). Continue discussions with HCC regarding alternative solutions.</p>

<p><i>Comments from organisations that agreed:</i></p> <p>Kings Langley Parish Council support the overall approach and is pleased that the village will not be adversely affected. It notes that 2 of the 4 'Pillars of the Community Development Fund' proposals of the 1990s are outstanding – the establishment of a museum and the development of a joint use sports hall. They suggest that opportunities should be sought to establish buildings for community use in the middle of the village.</p> <p>Three Rivers District Council support the overall approach to the place strategy. They state that there are five estates providing employment land in the Three Rivers part of the village. They also state their support for continued joint working between the two authorities.</p> <p>The Hertfordshire Biological Records Centre (HBRC) support the approach to the strategy, but request that the role of local farms in maintaining rural character is acknowledged.</p> <p>Friends of the Earth and CPRE Hertfordshire support the overall approach to the place strategy.</p> <p>Individuals:</p> <p><i>Comments from those who disagreed:</i></p> <p>Kings Langley is already overcrowded and adding new housing will exacerbate this.</p> <p>The primary school is over-subscribed and the secondary school has a poor road layout.</p>	<p>Comment noted. Detailed infilling boundaries for Major Developed Sites can be re-assessed through the Site Allocations DPD.</p> <p>Comment noted, no action required. The use of individual buildings is not a Core Strategy issue, but can be considered further through the Site Allocations DPD. Policy CS23 supports the retention of existing social infrastructure and supports the principle of additional provision.</p> <p>Amend the text at para 24.6 of the Core Strategy. Support for joint working is welcomed.</p> <p>The role of local farms is already highlighted within the Countryside Place Strategy (paragraph 27.9). No action required.</p> <p>Support welcomed.</p> <p>Comment noted, no action required. The level of development suggested for the village is appropriate for its size and will help meet local housing needs.</p> <p>Comment noted, no action required. Any improvements to the secondary school will need to consider the impact on the road layout through the planning application</p>
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<p><i>Comments from those who agreed:</i></p> <p>The support for improvements to the secondary school is welcomed as improvements are very much needed.</p> <p>Concern is raised about the housing development proposed in the Three Rivers part of the village and its impact on the village's infrastructure. It was suggested that appropriate financial contributions are sought from development in the Three Rivers part of the village towards mitigation of the impact on infrastructure.</p> <p>The village must remain separate from Hemel Hempstead and Watford.</p> <p>Landowners:</p> <p><i>Comments from landowners who disagreed:</i></p> <p>Grand Union Investments suggest that future housing levels should be restricted given the status of the village in the borough's settlement hierarchy.</p> <p><i>Other comments from landowners:</i></p> <p>Requests that the Green Belt boundary is be redefined so that land at Ridgeway Close is within the settlement boundary. The site is suitable for residential development and would help contribute to meeting housing need in Kings Langley. The site is available immediately, has no physical constraints and is located close to the railway station (Apsley). Although the site is within the Green Belt it does not perform any of the functions of Green belt land.</p> <p>Wishes to promote land at Love Lane for development of</p>	<p>process.</p> <p>Support welcomed.</p> <p>Comment noted, no action required. The Council will endeavour to ensure that any housing development in the Three Rivers part of Kings Langley includes appropriate measures to mitigate its impact on the infrastructure of the village, some of which is provided by Dacorum Borough Council. Three Rivers have stated their support for continued joint working between the authorities to address infrastructure issues.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. The village is designated as an area of limited opportunity in Table 1: Settlement Hierarchy. The level of housing development indicated for the village is considered appropriate bearing in mind its size and local needs.</p> <p>Comment noted, no action required. This site is not well related to Kings Langley village, and its development would breach an important Green Belt boundary (the railway line).</p> <p>Comment noted, no action required. Affordable</p>
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affordable housing for people within the Chipperfield area, which there is a great need for. Although the site is within the Green Belt, it is a relatively small site and is surrounded by development. The nearby Hill Farm development has no affordable housing and neither does Tyler Close.

housing needs should normally be met within Kings Langley village or through an exceptions site in or adjacent to Chipperfield village if this is where the need arises. It is however possible to consider whether the site would be appropriate for an affordable housing development through the Site Allocations DPD.

Bovingdon

QUESTION 26

Do you consider that the Local Allocation LA7 (land to the north of Chesham Road in Section 25 (which is in Housing Option 2) is appropriate to meet the long term needs of Bovingdon?

Responses received 27

Yes - Key organisations 1
 Individuals 5
 Landowners 1
Total 7 responses

No clear answer:
 Key organisations 0
 Individuals 0
 Landowners 0
Total 0

No - Key organisations 2
 Individuals 13
 Landowners 5
Total 20 responses

Response

Actions

Organisations:

Comments from organisations that disagreed:

Friends of the Earth do not consider LA7 to be appropriate as its development will compromise green infrastructure.

CPRE Hertfordshire do not support Local Allocation 7 because they support housing option 1.

Comments from organisations that agreed:

Bovingdon Parish Council consider that LA7 is appropriate to meet the long term needs of the village. They support the site over any other Green Belt sites, previously considered, because it only makes a limited contribution to the openness of the Green belt, and because it has natural defensible boundaries. The Parish Council's support for the designation of the site is contingent upon the site delivering 40% affordable housing, the remaining housing delivering an appropriate proportion being provided as specialist elderly accommodation and providing on- or off-site amenity space. Their support is also contingent upon the land owners producing a technical and financial assessment showing the viability of the site delivering the above.

The Council decided to retain the local allocation to help meet the borough housing target and provide some homes locally.

Comment noted, no action required.

Comment noted, no action required

Comment noted, no action required. The Ministry of Justice have undertaken feasibility and viability assessments to demonstrate that the scale and type of development proposed in the draft Core Strategy is deliverable. The Council is satisfied with the conclusions of these studies.

<p>Individuals:</p> <p><i>Comments from individuals who disagreed:</i></p> <p>There are already problems with flooding for some houses on the opposite side of Chesham Road and development of site LA7 would exacerbate this.</p> <p>The infrastructure of the village cannot cope with any more development. Particular types of infrastructure where concerns are raised are:</p> <ul style="list-style-type: none"> • capacity of the roads (this will be made worse by the new Tesco store as well as residential development) • the primary school • emergency services • utility supplies • doctors • drainage <p>Chesham Road is very dangerous for children and more cars arising from the development will exacerbate this.</p> <p>The site should be used as recreational space for the village. Facilities identified for the site include allotments and a skate park.</p> <p>The Green Belt should not be developed for housing. However, LA7 is the best of the four sites considered.</p> <p>All new housing built should be affordable.</p> <p>Concern was raised that a traveller pitch may be added to the site in the future.</p> <p>Housing so close to the prison and Bovingdon market will not be desirable.</p> <p><i>Comments from individuals who agreed:</i></p>	<p>Comment noted, no action required. See Policy CS31 of Draft Core Strategy.</p> <p>Comment noted, no action required. See conclusions of Dacorum Strategic Infrastructure Study. Also see Policy CS35 of Draft Core Strategy.</p> <p>Comment noted, no action required. Specific highway requirements will be discussed with Hertfordshire Highways and set out in the Site Allocations DPD.</p> <p>Comment noted, no action required. Development on this site will require on-site of off-site provision of amenity space.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. It is not financially viable to build 100% affordable housing.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. There is no physical separation by existing roads. Other housing adjoins the prison.</p>
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<p>The affordable housing should only be made available to those with a significant link to the village.</p> <p>Accessibility to the site must be fully considered and traffic calming measures included in proposals. In particular safe access for pedestrians must be a priority.</p> <p>Development must be part of a wider strategy to deal with brownfield sites around Bovingdon.</p> <p>Landowners:</p> <p><i>Comments from landowners who disagreed:</i></p> <p>Stanley Hicks and Son state that site LA7 is too far from the key village facilities; this is not acknowledged in the Assessment of Local Allocations and Strategic Sites. This is likely to lead to higher car use in an already congested area, which may impact on the operations of HMP the Mount.</p> <p>Stanley Hicks and Son and E.J. Hillier Will Trust point out that the Assessment of Local Allocations and Strategic Sites acknowledges that landowner interest in the site being developed is unknown. This could have serious implications for delivery.</p> <p>Stanley Hicks and Son and E.J. Hillier Will Trust state that the western part of the site lies within Bovingdon Airfield. Developing part of the Airfield would mean that the village boundary would be hard to defend against further development.</p> <p>E.J. Hillier Will Trust state that the site is within a high value wildlife corridor.</p> <p>E.J. Hillier Will Trust state that there is no justification as to why the site does not represent an important part of the countryside around the village.</p> <p>Stanley Hicks and Son, state that an objective of the</p>	<p>Comment noted, no action required. The occupation of affordable housing is determined by need.</p> <p>Comment noted, no action required. Measures relating to access will be determined through the Site Allocations DPD process.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. The site is relatively close to the village centre, and is the second closest of the four sites considered.</p> <p>Comment noted, no action required. Landowner interest has now been established.</p> <p>Comment noted, no action required. LA7 no longer includes any part of Bovingdon Airfield.</p> <p>Comment noted, no action required. All sites considered had some form of wildlife value. Development principles for the site will include the retention of mitigation or impact on any areas of wildlife value.</p> <p>Comment noted, no action required. The location and surrounding uses of the site restrict its value as 'countryside' to the village.</p> <p>Comment noted, no action required. The</p>
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<p>sustainability appraisal is to reduce crime and fear of crime. Having a development site close to the prison will increase fear of crime and more weight should be given to this.</p> <p>The Duckhall Farm owners argue that Duckhall Farm is a better location for a Local Allocation as it is closer to the key facilities of the village. The updated Duckhall Farm submission represents a logical extension of the village; it will not reduce the Green Belt gap between Bovingdon and Hemel Hempstead, nor will it extend beyond the existing built form boundary. Development at this site could contribute to street scene improvements in favour of pedestrians over car users. The revised Duckhall Farm site is large enough to accommodate the option 2 housing requirement and the residential care home. If the revised site were to be developed, the current farm could continue to operate on the part of the original site no longer included in the submission. The revised site is all is one family ownership (although there are different owners) and a development partner is on hand. Development of the site would not compromise the setting of the listed buildings and would enable the restoration and conversion of the barns. If the Duckhall Farm site is developed an area of land would leased for allotment use.</p> <p>E.J. Hillier Will Trust argues that Grange Farm would be a more suitable site for a Local Allocation. It has none of the deliverability issues identified for LA7 identified in the Assessment of Local Allocations and Strategic Sites. It is also on the same side of Chesham Road as the village centre.</p> <p>Mrs West argues that during the next 20 years there will be a need for a purpose built medical centre to replace and supplement the inadequate current provision. A care home would best be located near the medical centre. Land south of Green Lane (previously identified as Option 2) would be the best location for these facilities together with housing and open space. She argues that Land south of Green Lane would provide excellent and ample space for a residential care home, a medical centre, housing and open space.</p> <p>E.J. Hillier Will Trust argue that land for more than 60 dwellings should be allocated due to high housing need at Bovingdon and because the number of dwellings assumed to come forward in the urban area is unrealistically high.</p>	<p>Sustainability Appraisal reports that development of LA7 near to the prison may create anxiety related to the fear of crime. However, its significance is considered to be relatively minor.</p> <p>Comment noted, no action required. The Council have considered the revised submission of the site for residential development at Duckhall Farm and updated the conclusions of the Assessment of Local Allocations and Strategic Sites. The Chesham Road site remains the preferred location.</p> <p>Comment noted, no action required. See conclusions of Assessment of Local Allocations and Strategic Sites.</p> <p>Comment noted, no action required. No evidence has been provided by the applicant of the future need for a medical centre or care home. See conclusions of Assessment of Local Allocations and Strategic Sites.</p> <p>Comment noted, no action required. The Council's decision on the appropriate level of housing for Bovingdon is based on</p>
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<p>Grand Union Investments argue that all Green Belt sites on the edge of Bovingdon are less suitable for residential development than the land South of Berkhamsted against PPS3 objectives. See the Savills Alternative Sites Assessment for further details.</p> <p>Mrs West states that covenants exist restricting the use of the land to uses associated with the prison.</p> <p><i>Comments from landowners who agreed:</i></p> <p>The Ministry of Justice (MoJ), who own the site, have no objections to the site being developed for residential use. The site is not currently used by the prison and they have confirmed that they are unlikely to require the site for any use in the future. However, this is water and sewerage infrastructure running under the site. There is also a balancing pond on the site, for which liability issues will need to be resolved if development occurs.</p>	<p>housing need and environmental constraints.</p> <p>Comment noted, no action required. The site was ruled out as part of the Emerging Core Strategy process and not supported through the 'Assessment of Strategic Sites and Local Allocations'. See response to Question 19. It is important to ensure an appropriate spread of new homes across the borough.</p> <p>Comment noted, no action required. The Ministry of Justice have confirmed that such covenants do not exist, and the landowner did not provide proof of such covenants.</p> <p>Comment noted, no action required. The Ministry of Justice have undertaken feasibility and viability assessments to demonstrate that the scale and type of development proposed in the draft Core Strategy is deliverable.</p>
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QUESTION 27

Do you support the approach to ‘Bovingdon Place Strategy’ set out in Section 25?	
Responses received	25
Yes -	
Key organisations	4
Individuals	7
Landowners	1
Total	12 responses
No clear answer:	
Key organisations	1
Individuals	0
Landowners	0
Total	1
No -	
Key organisations	0
Individuals	9
Landowners	3
Total	12 responses
Response	Actions
<p>Organisations:</p> <p><i>Comments from organisations that agreed:</i></p> <p>Hertfordshire County Council support the strategy, but request that a statement be added to support improvements or additional facilities at the Primary School which is currently designated as Open Land.</p> <p>Friends of the Earth support the approach to the strategy subject to option 1 being pursued.</p> <p>Hertfordshire Biological Records Centre supports the overall approach but request that the value of local farms be noted in the strategy.</p> <p>Bovingdon Parish Council support the overall approach to the strategy.</p> <p><i>Other comments from organisations:</i></p> <p>Box Moor Trust is pleased that Grange Farm is not the preferred Local Allocation given their concerns about proximity to the Bovingdon Brickworks Conservation Area.</p>	<p>Comments noted. No action required. Where appropriate, existing Open Land policy will be applied flexibly to help support educational expansion.</p> <p>Comment noted, no action required.</p> <p>The role of local farms is already highlighted within the Countryside Place Strategy (paragraph 27.9). No action required.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required.</p>

<p>Individuals:</p> <p><i>Comments from individuals who disagreed:</i></p> <p>The level of housing proposed will place pressure on already overstretched infrastructure.</p> <p>The ageing population is not addressed in the Draft Core Strategy. New housing should include bungalows for the elderly living in large houses in the village.</p> <p>There is a need for more sporting facilities at the village. This could in part be met through floodlighting at the tennis club. The football club could be moved to the airfield and its land be used for expansion of the tennis club and allotments.</p> <p>The bowls club and/or the school should be relocated to the edge of the village and the sites used for parking and leisure facilities (school site only).</p> <p>In order to ease congestion there should be time limits on when delivery lorries can enter the village.</p> <p>Access to the Market from the A41 by-pass should be considered.</p>	<p>Comment noted, no action required. No significant infrastructure issues raised by technical work (Dacorum Strategic Infrastructure Study). Also see responses to Question 32 regarding wider infrastructure issues.</p> <p>See response to Question 11. Further advice has been sought from Hertfordshire County Council and has been included in Section 15 – Providing Homes. Discussions with Hertfordshire County Council regarding specific needs of the village will continue.</p> <p>Proposal LA7 includes a requirement for additional local open space. If any update to the outdoor leisure study highlights further improvements, these can be addressed through the Site Allocations DPD.</p> <p>Comment noted, no action required. The Council has not been approached by the land owners concerned. The proposal is therefore not considered a deliverable or viable option.</p> <p>Comment noted, not a Core Strategy issue.</p> <p>Comment noted, no action required. The Council has not been approached by the landowners regarding the suggestion. Additional access points onto the A41 are not supported by the</p>
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<p>The airfield and ancillary sites should be considered as a long term housing site.</p> <p>150 homes are not enough, 500 would be more appropriate.</p> <p>Encouraging trips by non-car modes will not work because people are too car dependent as it doesn't make financial sense.</p> <p>The strategy should be more explicit about how it will meet the objectives, for example how will new developments will maintain the distinctive characteristics of the village.</p> <p>More cycle parking is needed at key facilities.</p> <p>The Local Allocation site is open space, so developing for residential would contradict one of the aims of the strategy.</p>	<p>Highway Authority.</p> <p>Comment noted, no action required. Bovingdon airfield was considered for housing, and dismissed - see the conclusions in the published Assessment of Local Allocations and Strategic Sites.</p> <p>Comment noted, no action required. The respondent did not provide justification as to why 500 dwellings are appropriate. The Council's decision on the appropriate level of housing for Bovingdon is based on housing need and environmental constraints.</p> <p>Comment noted, no action required. The Core Strategy does not seek to force people to change their behaviour regarding non-car travel, but it does aim to make it easier for people to travel by non-car modes. The approach complies with national planning policies.</p> <p>Comment noted, no action required. See policies CS10, CS11 and CS12 relating to design.</p> <p>The principle of encouraging non-car modes of travel is already covered in Policy CS8. Cycle parking standards are part of the wider parking standards.</p> <p>Comment noted, no action required. The site is currently open: it is not however public open space. Development of the site will provide either on-site or off-site open space.</p>
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<p>The Local Allocation site would be better used as a residential care home.</p>	<p>Comment noted, no action required. The Council does not currently have evidence about the need for a care home in Bovingdon, although discussions with HCC are ongoing.</p>
<p><i>Comments from individuals who agreed:</i></p>	
<p>The strategy does not adequately address the shortage of parking in the village – it is suggested that the Halfway House site is used as a car park.</p>	<p>Comment noted, no action required. The poor parking situation in Bovingdon is indicative of a vibrant village. The Halfway House is currently in active use. The place strategy refers to the fact that a long term solution to congestion and parking issues will continue to be discussed with HCC.</p>
<p>Articulated vehicles cause damage to the roads, pavements and older buildings in the village. Weight restrictions on goods vehicles allowed in the village should be imposed.</p>	<p>Comment noted. This is a detailed traffic management and highway maintenance issue, not a Core Strategy issue.</p>
<p>Although on-street parking can cause problems in terms of congestion, it is important for the vitality of the village and it also calms the traffic. Therefore parking restrictions along the High Street should not be introduced.</p>	<p>Comment noted, no action required.</p>
<p>Landowners:</p>	
<p><i>Comments from landowners who disagreed:</i></p>	
<p>Stanley Hicks and Son object to the designation of a wildlife corridor through the Duckhall Farm Site. The Duckhall Farm site could be developed to include a nature reserve to mitigate the impact on the wildlife corridor.</p>	<p>Comment noted, no action required. The wildlife corridor is identified in the Urban Nature Conservation Study.</p>
<p>Stanley Hicks and Son note that there is also a wildlife corridor through the LA7 site, and a detailed assessment should be undertaken as to how development could mitigate its impact on this corridor.</p>	<p>Comment noted, no action required. Amend development principles for the site to include reference to the retention or mitigation of impact on areas of wildlife value.</p>
<p>Stanley Hicks and Son argue that there is a lack of consistency</p>	<p>Comment noted, no action required. Wildlife corridors</p>

<p>with the designation of wildlife corridors. Designation of a site as a County Wildlife Site should be supported by survey data.</p> <p>Grand Union Investments argue that all Green Belt sites on the edge of Bovingdon are less suitable for residential development than the land South of Berkhamsted against PPS3 objectives. See the Savills Alternative Sites Assessment for further details.</p> <p>E.J. Hillier Will Trust argues that the housing numbers for Bovingdon should be increased for the following reasons:</p> <ul style="list-style-type: none"> • The village is an unconstrained and sustainable location • The urban area cannot accommodate the numbers in option 1 • The high level of housing need <p>As a result of the above, a Greenfield extension to Bovingdon should have more than 60 dwellings.</p> <p>E.J. Hillier Will Trust point out that there is an inconsistency between the 79 dwellings identified as urban capacity sites and the 90 assumed in option 1 – this should be rectified.</p> <p>E.J. Hillier Will Trust argue that it is unsound to include SHLAA sites in assumptions regarding delivery within the urban area.</p> <p><i>Comments from landowners who agreed:</i></p> <p>The Duck Hall Farm owners support the approach to the strategy, and it is noted that development at Duck Hall Farm will</p>	<p>are identified in the Urban Nature Conservation Study. Wildlife corridors are not County Wildlife Sites.</p> <p>Comment noted, no action required. The site was ruled out as part of the Emerging Core Strategy process. See published Assessment of Local Allocations and Strategic Sites for further information. It is important to ensure a spread of new housing across the borough to meet local needs.</p> <p>Comments noted, no action required. The Council's decision on the appropriate level of housing for Bovingdon is based on housing need and environmental constraints.</p> <p>The figures have been checked and revised in the light of more recent monitoring information.</p> <p>Comment noted, no action required. The SHLAA sites included in the assumptions of urban capacity have been assessed by the Council. The Council considers that there is a reasonable prospect of these sites coming forward for development. SHLAA sites will be monitored for their progress over time. This approach complies with national guidance.</p> <p>Comment noted, no action required. The Council have considered the</p>
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<p>complement the aims of the strategy.</p>	<p>revised submission of the site for residential development at Duckhall Farm. The reassessment has not led to any change in the conclusions reached in the Assessment of Local Allocations and Strategic Sites (though it has been updated). The Chesham Road site is still preferred.</p>
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Markyate

QUESTION 28

Do you consider that the design and layout principles listed for Proposal SS2 (Hicks Road) are appropriate?

Responses received 11

Yes - Key organisations 1
 Individuals 2
 Landowners 0
Total 3 responses

No clear answer:
 Key organisations 1
 Individuals 0
 Landowners 0
Total 1

No - Key organisations 0
 Individuals 6
 Landowners 1
Total 7 responses

Response

Actions

No key organisations disagreed.

Key organisations who provided no clear answer made the following comments:

Markyate Parish Council:

- Figure 27 is too simplified.

See also responses to similar issues raised under Question 29.

*Note:
 Many of the comments relate to the associated Masterplan which informed the consultation.*

Comment noted, no action required. The vision diagram is deliberately simplified as the Council is aiming to capture key designations across the whole settlement. The Proposals Map will show detailed boundaries. This map is at a larger scale and uses an Ordnance Survey map base.

<ul style="list-style-type: none"> • Luton Road is most certainly not a secondary vehicular route. Buckwood Road and Pickford Road are also extensively used. • The difference between the 'inner zone' and the 'semi-urban zone' is not clear. None of the properties on the far side of the A5 are shown. • Use classes in need of explanation. Do not want shops to compete with the High Street. • No provision in plans for Hicks Road for leisure uses or facilities for children and young people. Residents want these uses rather than shops. • Strong support for a new surgery. In addition many residents want to see additional healthcare facilities (dentist etc). Would like a Health Centre to offer some of the services now only offered at Hospitals or in neighbouring towns • Doctors' surgery will need adequate parking. 	<p>Comment noted, no action required. Buckwood Road and Pickford Road are key routes in the village. Comment noted, no action required. This reflects differences in density of development. For clarification please refer to Urban Design Assessment (update) August 2011. The properties referred to are outside the village envelope and did not form part of the urban design assessment. Comment noted, no action required. The use classes relate to a range of common uses found in a shopping centre. These activities are seen as complementing rather than competing with existing shops. Comment noted, no action required. Such opportunities are most likely to arise from the redevelopment of Hicks Road. The commercial uses provide local employment opportunities, help make the scheme viable, and reinforce the role of the local centre. The site is not of sufficient size to provide large areas of open space. Comment noted, no action required. Support for surgery acknowledged. It will be the health authority who will be responsible for the type and range of services provided by the new health centre. Agreed. This is being</p>
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<ul style="list-style-type: none"> • Need to avoid an area where youths can congregate at night. <ul style="list-style-type: none"> • There is no convenient link to the High Street from Hicks Road. Footway is too narrow. <p>The following key organisation agreed but made no comments:</p> <ul style="list-style-type: none"> • Friends of the Earth <p><i>Individuals who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • In general an excellent proposal but why does it take so long. Need to speed up delivery. <ul style="list-style-type: none"> • Due to heavy on-street parking, pulling out of Hicks 	<p>sought through the redevelopment of Hicks Road. The development principles for Proposal SS2 specifically refer to public car parking to serve the surgery. Comment noted, no action required. Crime prevention is an important design consideration, particularly at the planning application stage. The principle of developments incorporating natural surveillance to deter crime and the fear of crime is included in Policy CS11. Comment noted, no action required. The redevelopment will allow opportunities to improve pedestrian links across the site.</p> <p>Noted.</p> <p>Comments noted, no action required. The landowner is keen to deliver the proposal and an application has already been submitted on part of the site. Comments noted, no action required. The proposal will be programmed as quickly as possible. The site's designation as a "Strategic Site" is intended to aid prompt delivery. Comments noted, no</p>
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<p>Road into the High Street is an accident waiting to happen.</p> <ul style="list-style-type: none"> • There is huge opportunity to make Hicks Road the 'centre' of the village. You could open the River Ver culvert completely and add a green swathe along it with perhaps a kiddies play area. • The site does not need retail or industrial uses. • There is more than enough retail on the High Street and there is already the industrial area to the south of Hicks Road which is massively underused. Also, there is loads of industrial space in Luton and Dunstable. • More focus needs to be put into helping and regenerating the High Street. New units on the site would not complement the High Street. • We do not need 25% affordable housing. Markyate is one of the cheapest housing areas in Hertfordshire and what it needs is an open space, a 'centre' for the village (the Y2K hall is much too far out to be this). • Sewerage system is already insufficient. It cannot handle any more development. • Area is already overdeveloped. No more housing should be built. • Parking in the village is a major problem already. This will only be made worse. Each new house built should have 2 parking spaces. • The Hicks Road/High Street junction is an accident waiting to happen. There are also major difficulties at the Pickford Road and Buckwood Road junctions. • The residential units proposed seem vast considering the space issues already faced, for example narrow roads, narrow footpaths, congested High Street, busy side roads (Pickford Road and 	<p>action required. The proposal represents an opportunity to improve parking and the junction arrangements.</p> <p>Comments noted, no action required. The allocation already seeks to achieve this.</p> <p>Comments noted, no action required. The proposed commercial uses seek to maintain local job opportunities in the village and complement existing uses on the High Street and increase footfall and dwell time.</p> <p>Comments noted, no action required. Many residents in Markyate still cannot afford open market housing. The proposal will deliver a number of key community benefits.</p> <p>New housing is required to meet future local needs. Existing evidence does not point to infrastructure being unable to cope with this level of new homes.</p> <p>Comments noted, no action required.</p> <p>Sufficient parking will be provided to serve the development.</p> <p>Comments noted, no action required. Highway issues will be considered in detail through the Master Plan and at the planning application stage.</p> <p>Comments noted, no action required. Design, flood risk and access arrangements are covered in the existing development principles</p>
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<p>Buckwood Road). Access points to the village cannot cope with any extra residents.</p> <ul style="list-style-type: none"> • Development not suitable as this is an area prone to flooding. <p><i>Landowners who disagreed made the following comments:</i></p> <p>Zog Brownfield Ventures Ltd:</p> <ul style="list-style-type: none"> • It is vital that future 'site specific' policy is sufficiently flexible to ensure that it does not stifle new development from coming forward. Policy should avoid being too prescriptive (i.e. stating absolute numbers of units to be achieved. Number of residential units stipulated (up to 80) is too restrictive. The site is capable of accommodating up to 110 units as part of a mixed use development scheme. • Reference in the principles section to "enable existing tenants to remain on site" should be deleted. There is no guarantee that reasonable terms can be agreed to keep existing businesses on site. • Reference in the principles section to "a mix of residential accommodation should be provided including predominantly two storey houses and apartments/flats" should be amended to include both two and three storey houses. • Development of the site should be phased enabling parts of the site which are 'development ready' to 	<p>and will be considered further through the Master Plan and planning application</p> <p>Comment noted. The number of units has been increased to 90 in the light of:</p> <ul style="list-style-type: none"> • Issues arising from a scheme on part of the site (application 4/00206/11); • The availability of additional land adjoining the allocation rear of Hicks Road and High Street. <p>This also requires changes to:</p> <ul style="list-style-type: none"> • the site area; • capacity; and • Markyate Vision diagram to show the extent of the site and its location within the 'inner urban' design zone. <p>It is important to ensure an attractive mix of activities across the proposal, a good relationship with neighbouring uses and effective use of the site.</p> <p>Comment noted, no action required. The development principles</p>
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<p>come forward in advance of the comprehensive redevelopment of the master plan area as a whole.</p> <ul style="list-style-type: none"> • Recognition of a reduced affordable housing requirement on the site in light of the costs/constraints of bringing forward new development is welcomed. 	<p>already accept this potential outcome.</p> <p>Comment noted, no action required. The principles would not rule out consideration of three storey houses, but this is best dealt with at the planning application stage. Comment noted, no action required. The development principles already accept that the proposal will be phased. Support acknowledged.</p>
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QUESTION 29

Do you support the approach to 'Markyate Place Strategy' set out in Section 26?	
Responses received	12
Yes -	
Key organisations	1
Individuals	3
Landowners	0
Total	4 responses
No clear answer:	
Key organisations	1
Individuals	0
Landowners	0
Total	1
No -	
Key organisations	2
Individuals	3
Landowners	2
Total	7 responses
Response	Actions
<p>Comments from key organisations</p> <p><i>Organisations who disagreed made the following comments:</i></p> <p>Highways Agency:</p> <ul style="list-style-type: none"> • Have reservations regarding the potential traffic implications arising from development in Markyate. All efforts should be made to reduce car dependency through the introduction of Travel Plan measures. • It is quite likely that development in this location will be very attractive to people who seek easy access to the Strategic Road Network. • Additional development traffic generated at A5 junctions adjacent to Markyate may create operational and safety issues. • The Highways Agency will need to be satisfied that total proposed development in Markyate will not adversely impact the operation and the safety of the A5. • This will require transport assessments to be brought forward in support of future planning applications for development to include traffic generation calculations, an assessment of existing conditions on the A5, traffic distribution calculations and junction capacity assessments of any Strategic Road 	<p>See also responses to similar issues raised under Question 28.</p> <p>Comments noted. Amend principles for SS2 to refer to impact on the A5 and the need for traffic assessments. Policy CS8 (Sustainable Transport) applies to all development and seeks to ensure new development contributes to a well connected and accessible transport system. This includes improving road safety and giving priority to the needs of other road and passenger transport users over the private car.</p>

<p>Network where proposed development is expected to generate 30 or more two-way trips. Further guidance is set out in Appendix B of the Protocol for Dealing with Planning Applications.</p> <p>Hertfordshire County Council: Markyate Primary school is washed over by an open land designation so suitable criteria to guide/enable additional development that might be required for education purposes would need to be included as part of an open land designation.</p> <p><i>Key organisations who agreed provided no comments.</i></p> <p><i>Key organisations who gave no clear answer made the following comments:</i></p> <p>Markyate Parish Council:</p> <ul style="list-style-type: none"> • Main parish survey had 92% support for improving Hicks Road area • 78% supported the moving of current businesses within the site to free space for other uses • Business survey less clear cut. Although support for improving the appearance of the area was strong, only half favoured moving businesses within the site. Half of the business respondents said they would be directly affected by the moves – some by lost custom. • While over 60% of households favoured demolition of large redundant buildings to make way for new developments, a similar proportion wanted to see conversion of redundant buildings. • 80% of respondents commented on what they would like to see on a cleared part of the Hicks Road site, but under a third opted for housing. A new police station topped the choices but provision has subsequently been made for the Police to use the Fire Station as a base in the village. A new surgery was almost as popular, followed by leisure facilities and facilities for children and young people. There is little support for groups of more than 10 new houses. • Existing businesses at Hicks Road should all be allowed to continue their trade without severe financial disadvantage or disruption. 	<p>Comment noted, no action required. Existing Open Land policy can be applied flexibly to help support educational expansion.</p> <p>Points arising from parish survey noted. These results generally support the principles included within Proposal SS2.</p> <p>Comment noted, no action required. The planning requirements already seek to retain</p>
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<ul style="list-style-type: none"> • If relocation is needed, it would be logical that industrial premises should be sited closest to the A5 and furthest from existing and new properties. This should also apply if there is any plan to move the other industrial premises in the village. • Hicks Road is one of two permitted entrances to the village for heavy goods vehicles from the A5. Access from the A5 needs improving. Hicks Road is narrow. Improvement to the road, footways, lighting and parking are all needed. • It is essential new housing has adequate parking as the current parking situation is already bad enough. • Drainage is an important issue. Any rationalisation or removal of the culverting of the River Ver should help with surface water issues as well as enhancing the environment. • Sewerage has also been a problem with overloading or blockages resulting in overflows of untreated sewage in the Hicks Road Area. • The village school is around capacity for a one class entry. We are concerned that new housing will not provide enough new pupils for a two class entry making for difficult funding issues. • Secondary education is also an issue with all local schools already oversubscribed and all difficult to access by public transport. In the Parish Survey there was 82% support for a new secondary school to accommodate pupils from Markyate, Redbourn, Flamstead and Great Gaddesden. 	<p>existing tenants where appropriate. The broad location of uses will be dealt with through the Masterplan and at the subsequent planning application stage. The existing commercial units (Sharose Court) facing onto the A5 are to be retained.</p> <p>Comment noted, no action required. These points are addressed through the Master Plan and will be tackled in detail at the planning application stage. Key issues are already addressed through the development principles for Proposal SS2.</p> <p>Comment noted, no action required. The County Council has not highlighted any fundamental problems with school capacity in relation to growth of the village. Contributions towards educational facilities are required.</p> <p>Comment noted, no action required. As no secondary schooling is provided within the village, new development is not going to affect current arrangements. This is a school planning issue that needs to be addressed with the</p>
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<ul style="list-style-type: none"> • 40% of households wanted new shops at Hicks Road. Only 10% of businesses surveyed wanted more shops. Would not wish to see the development at Hicks Road destroy the High Street shops and the heart of the village. <p>Comments from Individuals</p> <p><i>Individuals who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • Sewerage system is insufficient to accommodate any further development. • New development will exacerbate parking. • 190 new homes are too few. 250 new homes would be better. 	<p>County Council.</p> <p>Comment noted, no action required. The development seeks to reinvigorate the High Street through introducing new and attractive uses, and potentially reduce vacancies there.</p> <p>Comment noted, no action required. There is no evidence that local infrastructure cannot cope with proposed levels of growth for the village. See response to Question 32 (Infrastructure).</p> <p>Comment noted, no action required. The development will have to satisfy its own parking requirements. Replacement public car parking to serve the village, existing commercial uses and the new surgery is specifically required.</p> <p>Comment noted, no action required. The level of housing proposed is reasonable. It reflects housing land availability and local needs, and avoids the need for greenfield housing sites on the edge of the village.</p> <p>Comment noted, no</p>
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<ul style="list-style-type: none"> • Development will not complement the high street. Yes there will be a new “focus point” of the village but this will be at the expense of the high street. There is no need for extra commercial units as there are more than enough around Markyate. There are empty retail units on the High Street which should be made best use of. Para 26.10, which says that the key local shopping and service function of the village centre will be protected, cannot be assured. <p><i>Individuals who agreed made the following comments:</i></p> <ul style="list-style-type: none"> • Must face the fact that the River Ver is now only a storm water ditch and treat it as such to stop the flooding problems. • Yes the entire Hicks Road area needs redeveloping but we must respect the business that are there are accommodate them if they want to stay. • It is doubtful we need 80 new homes. Residential development should be slowly proceeded with. All new houses should be 3 storeys with double garages underneath. This will avoid exacerbating current parking issues. 	<p>action required. See earlier response above on this issue.</p> <p>Comment noted, no action required. There is no reason why the river could not be a feature of any development. The proposal is to create a focus for the village through a landscaped corridor, and to assist in the delivery of sustainable drainage. Amend principles to reinforce the role of the River Ver within the new public space.</p> <p>Comment noted, no action required. See earlier responses on retaining businesses and responses to Question 28.</p> <p>Comment noted, no action required. It is important to address housing needs in the village and look longer term. The design of the scheme is considered in more detail through the Master Plan and subsequently through the planning application stage. See earlier responses on parking issues.</p> <p>Support welcomed.</p>
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<ul style="list-style-type: none"> • Yes to a bigger and better doctors surgery. • We do not need any more commercial or retail units. We should just look after those in the High Street better. • We definitely do not need storage units as this will bring too much heavy traffic. 	<p>Comment noted, no action required. See earlier response to shop units.</p> <p>Comment noted, no action required. There is no aim to encourage large scale storage uses within any proposed redevelopment. The development principles refer to the new commercial units meeting the needs of small and medium enterprises.</p>
<p>Landowners who disagreed made the following comments:</p> <p>Zog Brownfield Ventures Ltd:</p> <ul style="list-style-type: none"> • Broadly support the Place Strategy, but do not support the identification of the Hicks Road strategic site as an 'Employment Zone' as highlighted on Figure 7: Markyate Vision Diagram. This is not in accordance with the emerging master plan for the site which proposes a mix of uses including residential, commercial and business. The site should be identified as a 'Mixed Use' Zone within Figure 27. <p>Grand Union Investments:</p> <ul style="list-style-type: none"> • The sensitive natural and historic character of Markyate should be preserved especially the High Street, Conservation Areas and greenfield around the settlement periphery. Therefore, new housing development should be limited and contained within the urban settlement of Markyate, in accordance with PPS1. • All potential Green Belt, greenfield housing locations at Markyate are considered to be less suitable than land to the South of Berkhamsted against PPS3 criteria. It is acknowledged that the Council have not 	<p>Comment noted. Designation reflects current rather than future uses. It is accepted that due to the redevelopment proposals the map should be amended to refer to the site as now forming part of the "inner zone" for urban design purposes.</p> <p>Comments noted, no action required. The Place Strategy seeks to concentrate development within the village boundary. There are no proposals for greenfield sites outside of the village boundary.</p>

<p>identified any Local Allocations at Markyate, however the Savills' Alternative Site Assessment considers previous sites' potential which have been identified as part of the CS consultation, to demonstrate that the village cannot sustainably expand outwards of any strategic significance.</p>	
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Countryside

QUESTION 30

Do you support the approach to the 'Countryside Place Strategy' set out in Section 27?	
Responses received	39
Yes - Key organisations	6
Individuals	11
Landowners	0
Total	17 responses
No clear answer:	
Key organisations	0
Individuals	4
Landowners	0
Total	4
No - Key organisations	4
Individuals	14
Landowners	0
Total	18 responses
Response	Actions
<p>Organisations:</p> <p><i>Organisations who disagreed made the following comments:</i></p> <p>Chipperfield Parish Council - para 27.5 should include reference to the role of Village Design Statements and Village Plans in protecting the quality of an area..</p> <p>Aldbury Parish Council objects to the 400 additional houses proposed for the villages and states this will result in the expansion of the village envelopes.</p> <p>Tring Rural Parish Council considers the proposed level of new homes in the countryside is excessive. A target should not be set. Instead, the Borough Council should look to provide small (10 homes) affordable housing sites in all small villages in the rural area over the next 10 years. Rural infrastructure will not support large development, the roads are narrow and there is already little public transport.</p> <p>Hertfordshire County Council (HCC) - criterion (e) in Policy CS7 would enable expansion of the primary school at Long Marston, if it could be demonstrated that there was an educational need, but there is no similar clause to enable delivery of any additional capacity at Little Gaddesden.</p>	<p>All comments have been noted, and one change to the Core Strategy was considered appropriate. Reference to initiatives such as Village Design Statements will be made in para 27.5.</p> <p>The Core Strategy should be read as a whole. It should not therefore be necessary to repeat items or provide cross references as a norm. It is also unnecessary to provide detail which is better suited to other documents.</p> <p>Policies CS5-7 and CS24-26 are critical to the delivery of the countryside strategy. Policy CS24 specifically covers the Chilterns Area of Natural Beauty. Policy SC26 refers to the</p>

<p><i>Organisations who agreed made the following comments:</i></p> <p>Tring Town Council and Nettleden with Potten End Parish Council support the vision.</p> <p>Friends of the Earth supports the vision, but states that more emphasis should be placed on protecting the Green Belt.</p> <p>Box Moor Trust supports the vision but states that some woodland has the potential for significant contributions to biodiversity and also recreation. The Trust are surprised that none of its land is deemed to be a key biodiversity area.</p> <p>The Chilterns Conservation Board generally supports this section. Not all issues are addressed in the section at present. It suggests the inclusion of cross references to relevant policies.</p> <p>Herts Biological Records Centre supports the vision. However more clarity is needed on what is meant by “development supporting changes in agriculture”. There needs to be the retention of traditional agriculture where possible, supported or enabled by appropriate development or support for diversification activities where they actively help maintain viable farming enterprise conservation. HBRC particularly supports paras 27.9, 27.10 and 27.14. However paragraph 27.14 should also include ‘species’.</p> <p>Individuals:</p> <p><i>Individuals who disagreed made the following comments:</i></p> <ul style="list-style-type: none"> • It depends where development is planned and whether it is in the Green Belt. More information is needed. • The Green Belt and wider Countryside should not be used for housing. • The objective of protecting the Countryside is contradicted by proposals to release Green Belt land • The countryside should be reserved for agriculture woodland and preservation of biodiversity as it is the most important asset that we have. No new housing 	<p>conservation of habitats and species. Other policies are relevant as well.</p> <p>Policy CS7 would apply to Little Gaddesden. Criterion (e) would enable an extension to the primary school to be permitted.</p> <p>The Green Belt is a planning policy, whose purpose is to prevent unrestricted building development encroaching on the countryside. However, when deciding long term development needs (as to 2031), it is appropriate to consider the need to identify any Green Belt land for release. Land within the Green Belt, as defined in the Local Development Framework, should then be kept free from general building development. Local allocations will have a specific site by site impact, but will not undermine the essential principle of the separation of settlements, e.g. Hemel Hempstead with Potten End, Picotts End or Redbourn.</p> <p>The Council has followed Government policy on Green Belts.</p> <p>The countryside vision and strategy outline the view of what the countryside will be like in 2031 and how that will</p>
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<p>should be permitted.</p> <ul style="list-style-type: none"> • More should be done to reduce traffic through villages and rural lanes. Public transport should be encouraged throughout the Borough, with the urban use subsidising the rural use. • The Green Belt should not be used to provide parks for Hemel Hempstead or Berkhamsted: these should be provided within the towns where people have ready access to them. • The level of new homes proposed within the countryside will not be sufficient to accommodate the natural growth of the rural population. • Questions how the plan can ensure more visitors arrive by public transport or bicycle. • Para 27.18 should be amended so that low flying aircraft are discouraged from flying over all rural areas, not just the Chilterns. The tranquillity of Boarscroft Vale needs protecting. <p><i>Individuals who agreed made the following comments;</i></p> <ul style="list-style-type: none"> • The existing rights of way network should be maintained well and enhanced by providing new links. • The strategy is good. <p><i>Other comments from individuals:</i></p> <ul style="list-style-type: none"> • Development West of Hemel Hempstead will have a negative impact on Potten End, Pouchen End and Fields End, causing these to merge with Hemel Hempstead. 	<p>be achieved. Part of the countryside falls within the Metropolitan Green Belt. Within the countryside, development may be permitted for a variety of purposes, not only agriculture and forestry, but parks and new homes, businesses and local facilities which sustain the countryside and help provide for the communities that live there.</p> <p>The provision of around 420 homes in the countryside between 2006 and 2031 would be a small fraction of overall supply, some 3.5-4%. It would be insufficient to meet the natural growth of population in the countryside. However, the rate of provision would be similar to current rates. Small scale schemes, judged in the context of the site and settlement, would be permissible under Policies CS7 and CS20. The Council has balanced the need for homes and their benefits with the impact on the countryside environment.</p> <p>Paras 27.9 and 27.10 explain how the countryside strategy will help support agriculture. If there are changes in crops or animal welfare standards, development (e.g. farm shops) should normally help rather than hinder. Viable farming</p>
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which meets economic and environmental objectives is the goal.

The Local Transport Plan and related documents, and Dacorum's cycling strategy will amplify how sustainable transport measures will be addressed in the shorter and longer term.

Para 27.18 refers to tranquillity in general. The Chilterns AONB is nationally important. Much of it is at a higher level than Boarscroft Vale. This means that the nuisance caused by 'low flying' aircraft would be greater (because homes and aircraft are closer together). The issue of tranquillity is still important in Boarscroft Vale (see Para 19.36).

Box Moor Trust land is an important component of the Borough's green infrastructure and will be recognised in the Green Infrastructure SPD. It is not however a key biodiversity area (ref Urban Nature Conservation Study for example).

Delivery

QUESTION 31

Do you support the approach for delivery set out in Section 28?				
Responses received	17			
Yes -			No clear answer:	
Key organisations	6		Key organisations	0
Individuals	2		Individuals	2
Landowners	0		Landowners	0
Total	8 responses		Total	1
No -				
Key organisations	2			
Individuals	6			
Landowners	0			
Total	8 responses			
Response		Actions		
<p>Organisations:</p> <p><i>Comments from organisations that disagreed:</i></p> <p>Hertfordshire County Council (Environment) do not support the approach because the issues identified with capacity at Maple Lodge Waste Water Treatment Works must be resolved if the Core Strategy is to be considered deliverable and sound at examination.</p>		<p>Comment noted, no action required. The Council undertook a Water Cycle Scoping Report with neighbouring authorities and key stakeholders – the Environment Agency, Thames Water Utilities and Veolia Water. No fundamental constraints were identified in the short term. The group have maintained regular liaison. The issue of sewage treatment infrastructure is identified in Para 29.5, as is the need for continued liaison. The issue is not confined to Dacorum, and Thames Water is investigating when any absolute constraint to development might occur, and thus the timing of new or enhanced infrastructure. Their advice will be followed. It will be particularly relevant to future policy documents and the infrastructure</p>		

<p>Hertfordshire County Council (Hertfordshire Property) support most elements of the approach, but are concerned that the Planning Obligations SPD does not include contributions towards secondary education as a matter of course.</p> <p><i>Comments from organisations that agreed:</i></p> <p>Tring Town Council, Bovingdon Parish Council, Hightown Praetorian & Churches Housing Association, Friends of the Earth, Hertfordshire Biological Records Centre and Jehovah's Witnesses support the approach.</p> <p>Individuals:</p> <p><i>Comments from individuals who disagreed:</i></p> <p>The approach is not supported because the respondent does not want any more development in Berkhamsted.</p> <p>The Core Strategy does not deal with the co-ordination of the delivery of new infrastructure with development. This section should include a detailed project plan showing the task interdependencies.</p>	<p>delivery plan.</p> <p>Comment noted, no action required. The Planning Obligations SPD was based on the evidence available. It will be reviewed when the Core Strategy is adopted and will take new evidence into account. Contributions can be taken towards secondary education if provided by the County Council. This will be particularly important for a future Community Infrastructure Levy Charging Schedule / Developer Contributions LDD.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. Sections 28-30 cover issues of delivery. Policy CS35 addresses the timing of development and critical infrastructure capacity. Delivery and co-ordination of infrastructure will be considered in more detail through the infrastructure Delivery Planning process, the Site Allocations DPD, development briefs and planning applications.</p>
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<p><i>Comments from individuals who agreed:</i></p> <p>None</p> <p><i>Other comments from individuals:</i></p> <p>This section of the Draft Core Strategy where flexibility is mentioned. This should be embedded throughout the document.</p> <p>The respondent disagrees with the strategy for Berkhamsted.</p>	<p>Comment noted, no action required. Flexibility is embedded throughout the Draft Core Strategy. Section 28 explains the key areas of flexibility within the Core Strategy.</p> <p>Comment noted, no action required.</p>
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Infrastructure

QUESTION 32

Do you support the approach for infrastructure set out in Section 29?				
Responses received	31			
Yes -			No clear answer:	
Key organisations	6		Key organisations	0
Individuals	8		Individuals	1
Landowners	1		Landowners	0
Total	15 responses		Total	1
No -				
Key organisations	4			
Individuals	9			
Landowners	2			
Total	15 responses			
Response		Actions		
<p>Organisations:</p> <p><i>Comments from organisations that disagreed:</i></p> <p>Berkhamsted Town Council do not support the approach because Planning Obligations from developments in Berkhamsted should be used for infrastructure projects within the town. They also note some of the requirements of PPS12.</p> <p>Nettleden with Potten End Parish Council do not support the approach because development in West Hemel Hempstead will have a severe impact on Potten End, but Potten End will receive no benefit from this development.</p> <p>Network Rail does not support the approach because they request that rail infrastructure is included within the definition of physical infrastructure to enable S106 monies to be spent on improvements to rail infrastructure.</p>		<p>Comment noted, no action required. Planning obligations must be reasonably related to the development; infrastructure with a local catchment will be funded by local new development while infrastructure with a borough wide catchment will be funded by new development throughout the borough.</p> <p>Comment noted, no action required. An assessment of infrastructure requirements arising from development at West Hemel Hempstead will be set out in the Site Allocations DPD. The development must meet these requirements, some of which may be in Potten End.</p> <p>Comment noted, no action required. Rail infrastructure is covered by the term 'public transport'</p>		

<p>The Hertfordshire Police Authority support the overall approach but request that 'Police Services' is listed under Social Infrastructure in paragraph 29.1.</p> <p><i>Comments from organisations that agreed:</i></p> <p>Bovingdon Parish Council support the approach subject to regular review of the Infrastructure Delivery Plan (IDP).</p> <p>Hertfordshire County Council support the approach, but request that the section acknowledges that many services towards which contributions are sought are provided by the County Council.</p> <p>Thames Water support the approach but request that either the Core Strategy or Development Management Policies DPD include policies and supporting text regarding Water and Sewerage Infrastructure Capacity and the development of new water supply or waste water facilities. They have suggested wording for the policies and the supporting text. See response for full details.</p> <p>Tring Town Council, Friends of the Earth and the NHS Trust support the approach.</p> <p>Comments from Individuals:</p> <p><i>Comments from individuals who disagreed:</i></p>	<p>and included in the definition of physical infrastructure.</p> <p>Comment noted, no action required. Police services are covered by 'emergency services', which is included within the definition of social infrastructure.</p> <p>Comment noted, no action required. The IDP will be subject to regular review.</p> <p>Amend para 29.8 to acknowledge that contributions collected from developers will be passed on to infrastructure providers as appropriate.</p> <p>Policy CS35 and the supporting text cover the issue of water and sewerage infrastructure capacity sufficiently, and support the principle of contributing to such infrastructure. However reference will be made to the existing sewerage capacity issue in para 29.5. There is not sufficient justification for including a policy solely for water utilities infrastructure. Sites can be allocated in the Site Allocations DPD, and if necessary dealt with on an exceptions basis. Development cannot proceed without key infrastructure.</p> <p>Comment noted, no action required.</p>
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<p>Development in West Hemel Hempstead will have a severe impact on Potten End, but Potten End will receive no benefit from this development.</p> <p>No new homes and more bridlepaths for horses and walkers.</p> <p>Placing the onus of infrastructure improvements on developers is not a solution; clear plans of infrastructure improvements should be set out.</p> <p>Development on the scale proposed will require significant infrastructure development. The Core Strategy addresses this to an extent; however, the current economic conditions are likely to make it difficult to support the delivery of such infrastructure. There is a risk that infrastructure may never catch up with development.</p> <p>Water and sewerage are very problematic in this, the driest area of the country, and continues to be ignored. The scale of development planned across the county mean that water consumption targets and metering will not be sufficient to address the problem.</p> <p>Developers should not have to pay towards the provision of infrastructure because the price they receive for their development is determined by its size and location. Because of this it is unlikely that developers will not be able to pay for major infrastructure.</p> <p>The strategy assumes that existing infrastructure is sufficient, but this is not the case.</p> <p>This is a bribery policy and has no regard for environmental and visual impacts.</p> <p>The approach implies that infrastructure will be provided after housing, which is the wrong way round.</p>	<p>Comment noted, no action required. Planning and infrastructure requirements arising from development at West Hemel will be set out in the Site Allocations DPD. The development must meet these requirements, some of which may relevant to Potten End.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. An IDP will guide improvements.</p> <p>Comment noted, no action required. This is a risk across the whole country. However, development will not be permitted to breach critical infrastructure limits.</p> <p>Comment noted, no action required. The Council will continue to work with Thames Water to ensure sufficient water supply and sewerage capacity exists.</p> <p>Comment noted, no action required. Requiring developers to pay towards the cost of mitigating infrastructure is an established principle of the planning system.</p> <p>Amend text to acknowledge existing deficits (para 29.3)</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. This is not necessarily the case - see</p>
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<p><i>Comments from individuals who agreed:</i></p> <p>Existing infrastructure deficits and funding gaps should be addressed before any new developments are progressed.</p> <p>New infrastructure must be planned in advance. If the approach is based on the assumption that it will be provided, then the approach will fail.</p> <p>Funds obtained towards infrastructure from developments in Berkhamsted should be spent on infrastructure projects in Berkhamsted. Large scale developments should not be permitted unless infrastructure improvements are assured.</p> <p><i>Other comments from individuals:</i></p> <p>This section should include a description of the effects of new development on existing infrastructure.</p> <p>Landowners:</p> <p><i>Comments from landowners who disagreed:</i></p> <p>Gleeson Strategic Land suggest that policy CS35 is amended to reflect the fact that in the case of large scale infrastructure items, which are funded through pooled contributions, development may be allowed to take place in advance of infrastructure being provided.</p> <p>The Royal Mail state that the level of contributions sought must comply with Circular 05/05 and regulation 122 of the CIL Regulations 2010 and have been independently verified.</p> <p>The Royal Mail suggest that the wording of Policy C35 is amended to introduce flexibility where viability is threatened.</p> <p><i>Comments from landowners who agreed:</i></p>	<p>2nd para of Policy CS35.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. New infrastructure will be planned in advance. It will be guided by the Infrastructure Delivery Plan and Policy CS35.</p> <p>Comment noted, no action required. Planning Obligations must be reasonably related to the development; infrastructure with a local catchment will be funded by local new development while infrastructure with a borough wide catchment will be funded by new development throughout the borough.</p> <p>Comment noted, no action required.</p> <p>This is sufficiently covered by Policy CS35 which states that 'Appropriate phasing for the delivery of infrastructure will be decided on a case by case basis.'</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. See para 29.11.</p>
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Barratt Strategic agree that details of infrastructure are best dealt with in the relevant DPDs and the Planning Obligations SPD.	Comment noted, no action required.
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Monitoring

QUESTION 33

Do you support the approach for monitoring set out in Section 30?	
Responses received	17
Yes -	
Key organisations	3
Individuals	6
Landowners	1
Total	10 responses
No clear answer:	
Key organisations	0
Individuals	3
Landowners	0
Total	3
No -	
Key organisations	1
Individuals	3
Landowners	0
Total	4 responses
Response	Actions
<p>Organisations:</p> <p><i>Comments from organisations that disagreed:</i></p> <p>Berkhamsted Town Council request that the statement in para 30.4 that some monitoring targets are set nationally is clarified in light of new Government Policy and the Localism Bill.</p> <p><i>Comments from organisations who agreed:</i></p> <p>Bovingdon Parish Council support the approach.</p> <p>Friends of the Earth support the approach and request that the public are continuously consulted.</p> <p>Hertfordshire Biological Records Centre support the approach but warn that some government monitoring target may change, or could be improved locally.</p> <p>Individuals:</p> <p><i>Comments from individual who disagreed:</i></p> <p>The issue of accountability and independent assessment is questioned as the Council is responsible for implementing the strategy, monitoring performance, analysing results and producing an Annual Monitoring Report.</p> <p>Monitoring should be continually undertaken, not done annually. If an indicator or trend is going off track it should be corrected</p>	<p>Delete reference as to how monitoring targets are set. There could be changes to Government policy or other factors which may suggest updating.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required.</p> <p>See above response.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required.</p> <p>Comment noted, no action required. See Policy CS35.</p>

<p>immediately.</p> <p>Para 30.7 regarding developer contributions implies that infrastructure will not be in place until after the development is built, which is too late.</p> <p>The Draft Core Strategy should be subject to further public consultation once the implications of the Localism Bill have been incorporated.</p> <p><i>Comments from individuals who agreed:</i></p> <p>Monitoring and accountability is crucial.</p> <p><i>Other comments from individuals:</i></p> <p>Para 30.4 states that some monitoring targets are set nationally; this should be clarified in light of new Government policy and the Localism Bill.</p> <p>The main aim of monitoring should be to reduce the housing waiting list. The approach should incorporate a guarantee that if a specific target relating to the housing waiting list is not met, all development will cease until the target is met.</p> <p>Landowners:</p> <p><i>Comments from landowners who agreed:</i></p> <p>Barratt Strategic support the approach.</p>	<p>Comment noted, no action required.</p> <p>Comment noted, no action required.</p> <p>See response to Herts Biological Records Centre.</p> <p>Comment noted, no action required. The Council monitors the number of affordable dwellings built, and its own housing register.</p> <p>Comment noted, no action required.</p>
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Appendix 2

Citizens Panel Report

Housing Growth and Regeneration Survey

Summary Report of Findings for Dacorum Borough Council

March 2011

Chapter 1: Introduction

The Survey

1.1 Opinion Research Services (ORS) has been commissioned by Dacorum Borough Council to undertake a housing growth and regeneration survey with members of Dacorum Borough Council's Citizens' panel. The survey contained questions designed to help the Council prepare two key documents – the Core Strategy and the Regeneration Plan (which has since been re-named 'the Dacorum Delivery Plan').

1.2 During November and December 2010 the Council carried out public consultation on its Draft Core Strategy. To supplement this public consultation, the Council wished to gain the views of the Citizens' Panel on some of the questions asked previously and on some more detailed issues. The results of this survey, alongside the results of the public consultation, will help the Council finalise the document and choose its housing target. The results will also help inform the Council's new 'Dacorum Delivery Plan', which will be drawn up in 2011.

1.3 The Dacorum Citizens' panel is made up of around 1,000 residents of the Borough and is designed to be representative of Dacorum as a whole. The panel are invited to participate in various surveys throughout the year (either by post, online or by phone) with the aim of maximising response rates and representativeness. The methods of recruitment for the panel mean that the sample is not entirely random and is affected to some degree by quota and sample bias, however, the Dacorum panel has a good profile and can be said to be 'representative' of the area.

1.4 ORS refreshed around half the panel members in 2010 to increase response rates and representativeness. This involved the removal of 500 members who were poor-responders (as well as those who had moved away from the area or died) and the recruitment of another 500, initially via post and online, and subsequently on-street to target hard to reach members i.e. minority ethnic groups and younger people.

Methodology

1.5 The questionnaire was distributed by post and was made available online to members of Dacorum Borough Council Citizens' Panel on the 21st January, 2011 with a reminder sent out on the 10th, February 2011. The cut-off date for returned questionnaires was 28th February, 2011.

The Response

1.6 The survey was distributed to 994 panel members in total. 489 questionnaires were completed (314 by post and 175 online), yielding a response rate of 49%.

Interpretation of the Data

1.7 Although the survey was distributed to all panel members, the returned sample can be unbalanced due to non-response by some members. Therefore, the survey results are, where necessary, weighted to correct any imbalances in the returned sample.

1.8 Comparative data was available for gender, age, economic status, tenure, ethnic group and ward. Results were checked against these and then subsequently weighted by age and gender. The tables on the following pages show the un-weighted and weighted profiles of the responses to the survey. The results are therefore representative of the population of Dacorum Local Authority.

1.9 Throughout the volume an asterisk (*) denotes any value less than half a per cent.

1.10 Where percentages do not sum to 100, this may be due to computer rounding, the exclusion of “don’t know” categories, or multiple answers.

Respondent Profile

1.11 The tables that appear without commentary on the following pages show the profile of survey respondents in relation to a range of characteristics. Each table includes details about the number and percentage of respondents.

1.12 Please note * denotes a percentage which is less than 1%

Table 1: Gender – All Respondents Note: Figures may not sum due to rounding Gender	Unweighted Count	Unweighted Valid %	Weighted Valid %
Male	253	52	44
Female	234	48	56
Not Known	2	-	-
Total	489	100	100
Table 2: Age Group – All Respondents Note: Figures may not sum due to rounding Age Group	Unweighted Count	Unweighted Valid %	Weighted Valid %
18-39 years	77	16	40
45-64 years	265	55	41
65 years and over	143	29	19
Not Known	4	-	-
Total	489	100	100
Table 3: Ethnicity – All Respondents Note: Figures may not sum due to rounding Ethnicity	Unweighted Count	Unweighted Valid %	Weighted Valid %
White	470	98	97
Non-white	12	2	3
Not Known	7	-	-
Total	489	100	100
Table 4: Illness – All Respondents Note: Figures may not sum due to rounding Employment Status	Unweighted Count	Unweighted Valid %	Weighted Valid %
Long-term illness	109	22	19
No long-term illness	376	78	81
Not known	4	-	-
Total	489	100	100
Table 5: Working Status – All Respondents Note: Figures may not sum due to rounding Employment	Unweighted Count	Unweighted Valid %	Weighted Valid %

Status			
Working	281	58	67
Retired	158	33	22
Other	44	9	11
Not Known	6	-	-
Total	489	100	100
Table 6: Tenure – All Respondents Note: Figures may not sum due to rounding Tenure	Unweighted Count	Unweighted Valid %	Weighted Valid %
Owned	375	78	77
Rented	101	21	22
Other	5	1	1
Not Known	8	-	-
Total	489	100	100

Table 7: Ward Group – All Respondents Note: Figures may not sum due to rounding Ward Group	Unweighted Count	Unweighted Valid %	Weighted Valid %
Adeyfield East	15	3	3
Adeyfield West	11	2	2
Aldbury and Wigginton	11	2	2
Apsley	12	2	2
Ashridge	9	2	1
Bennetts End	16	3	4
Berkhamstead Castle	27	6	7
Berkhamstead East	24	5	5
Berkhamstead West	24	5	4
Bovington, Flaunden&Chipperfield	32	7	5
Boxmoor	21	4	5
Chaulden&Shrubhill	24	5	5
Corner Hall	24	5	5
Gadebridge	12	2	4
Grove Hill	17	4	3
Hemel Hempstead Central	19	4	3
Highfield& St Pauls	19	4	5
Kings Langley	17	4	3
Leverstock Green	28	6	6
Nash Mills	6	1	1
Northchurch	16	3	4
Tring Central	20	4	4
Tring East	17	4	3
Tring West	23	5	4
Warners End	9	2	2
Watling	18	4	4
Woodhall	13	3	3
Not Known	5	-	-
Total	489	100	100

Rank Analysis

1.13 In this report reference has been made to ‘rank analysis’. This occurs when respondents have been asked to rank or prioritise a selection of different options. For rank analysis each priority is given a score (e.g. 1st priority is given one point, 2nd priority 2 points, 3rd priority 3 points). A total score for each response option is then calculated. This total score is then divided by the number of respondents to give an average score. The response options are then ranked according to their average score, the lowest being the highest priority.

Graphics

1.14 Graphics are used extensively in this report to make it as user-friendly as possible. The pie charts and other graphics show the proportions (percentages) of respondents making relevant responses. Where possible the colours used in the charts have been standardised with a ‘traffic light’ system in which:

- Green shades represent positive responses
- Beige represents neither positive nor negative responses
- Red shades represent negative responses
- The bolder shades are used to highlight responses at the 'extremes' – for example, very satisfied or very dissatisfied.

1.15 Please note that the figures may not always sum to 100% due to slight rounding errors.

Acknowledgements

1.16 ORS would like to thank Claire McKnight and Laura Wood at Dacorum Borough Council for their help and assistance in developing the project. We would also like to thank the 489 people who took part in the survey, without whose valuable input the research would not have been possible.

Publication of Data

1.17 As with all our studies, findings from this survey are subject to our Standard Terms and Conditions of Contract. Any press release or publication of the findings of this survey requires the advance approval of ORS. Such approval will only be refused on the grounds of inaccuracy or misrepresentation.

Chapter 2: Key Findings

The Borough Vision

2.1 More than two thirds (68%) of residents support the 'Borough Vision', while a further 28% agree in part. Only 4% do not support the 'Borough Vision'.

2.2 Of those who do not support the vision or agree only in part, there are a wide range of areas that they disagree with and reasons for this. A fifth (20%) stated that they disagree with the reference to the *transformation of Hemel Hempstead*. Other comments that were relatively frequently given (11% in each case) as reasons for disagreeing with the vision include: *lack of healthcare provision currently; poor range of shops/shops are all the same; lack of education provision currently; and vision is fine, reality is another story*.

2.3 Specific changes to the 'Borough Vision' stated by those who *do not support* or *only agree in part* to the vision include: *education provision to be increased (10%); healthcare provision to be increased (10%); and wider range of shops required (8%)*.

The Local Neighbourhood/Area

2.4 In terms of the aspects of the local area that are most valued, *access to green space* and *access to local health facilities* were rated as either very or fairly important by the highest proportion of residents (96% and 97% respectively). It is also evident that there are other aspects which are of great importance and these are very wide ranging; examples include: good infrastructure (roads and public transport), community safety, and a good general environment (please see separate results document for further details).

2.5 In order to take the borough vision forward the Council have a number of objectives. The three objectives with the highest proportion of residents rating them as either very or fairly important are: *to promote healthy and sustainable communities and a high quality of life for Dacorum (96%); to conserve and enhance the function and character of the market towns, villages and countryside (95%); and to ensure the effective use of existing land and previously developed sites (95%)*.

Housing Targets

2.6 A number of conflicting social, economic and environmental factors need to be considered when choosing the most appropriate housing target for the area. 96% of residents agree (71% strongly) that *we must make sure that new development is supported by new infrastructure* and 90% agree (66% strongly) that *the countryside should be protected from further development*.

2.7 However, *provide affordable housing so that young people can afford to stay in the area (73%)* and *support the local economy by supporting new development (68%)* received the lowest agreement levels (although these are both still above two thirds -73% and 68% respectively) while 8% and 12% respectively disagreed with these concepts.

2.8 Around three fifths (62%) of residents support housing target option 1 (370 homes per year), while almost a fifth (18%) support option 2 (430 homes per year) and a further fifth (20%) support neither.

2.9 Of those who do not support either of the proposed targets the most common responses were: *just less/the absolute minimum* (19%) and *0/no more to be built* (19%), while 12% feel the targets are not appropriate but do not suggest an alternative. Very few suggest a figure that is above the higher of the two proposals (4%).

2.10 The most frequently occurring reasons given for the alternative targets are *infrastructure in area is already struggling* (26%) and *effect upon the area's character/too urban already* (12%).

Priorities

2.11 With regard to regeneration policies, the top five ranked priorities are: (1) *Making better use of derelict/run-down land*; (2) *the quality of local open space e.g. parks*; (3) *street cleaning and litter collection*; (4) *provision of affordable housing*; (5) and *improving community facilities*.

2.12 In terms of the focus of the regeneration within the borough, the top three ranked priorities are (1) *town centres*; (2) *wherever the need is greatest*; and (3) *residential areas*. Please see separate results document for a list of other focuses stated.

Chapter 3: Results

The Borough Vision

Figure 1: Q1 (a). Do you support the 'Borough Vision'?
Base: All Residents (474)

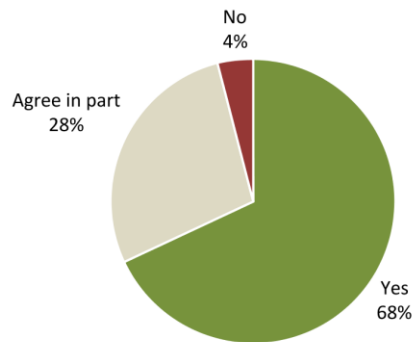


Figure 2: Q1 (b) Please state the part of the vision you disagree with, giving your reason(s)?
Base: All Residents who disagreed with all or part of the strategy (140)

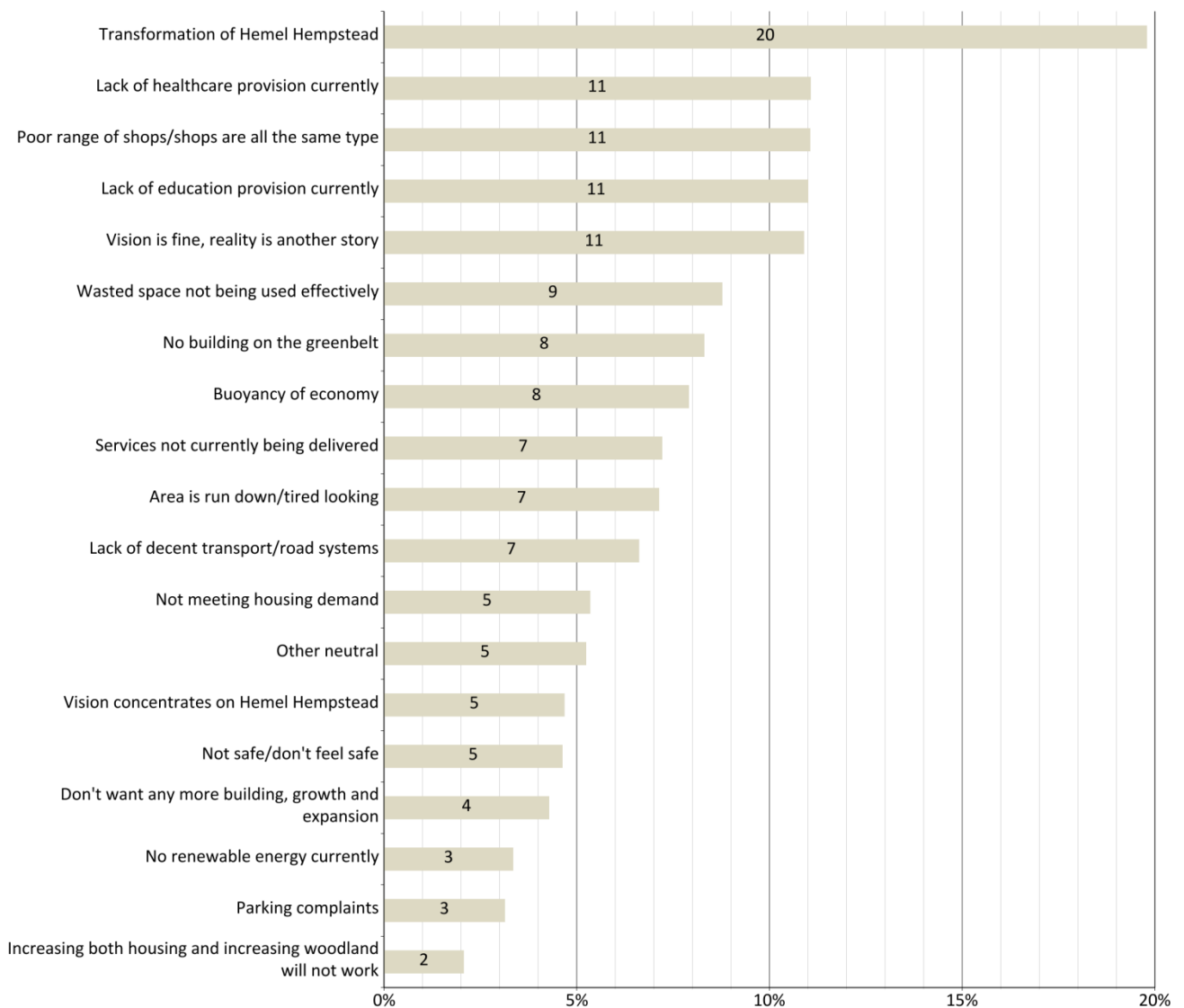
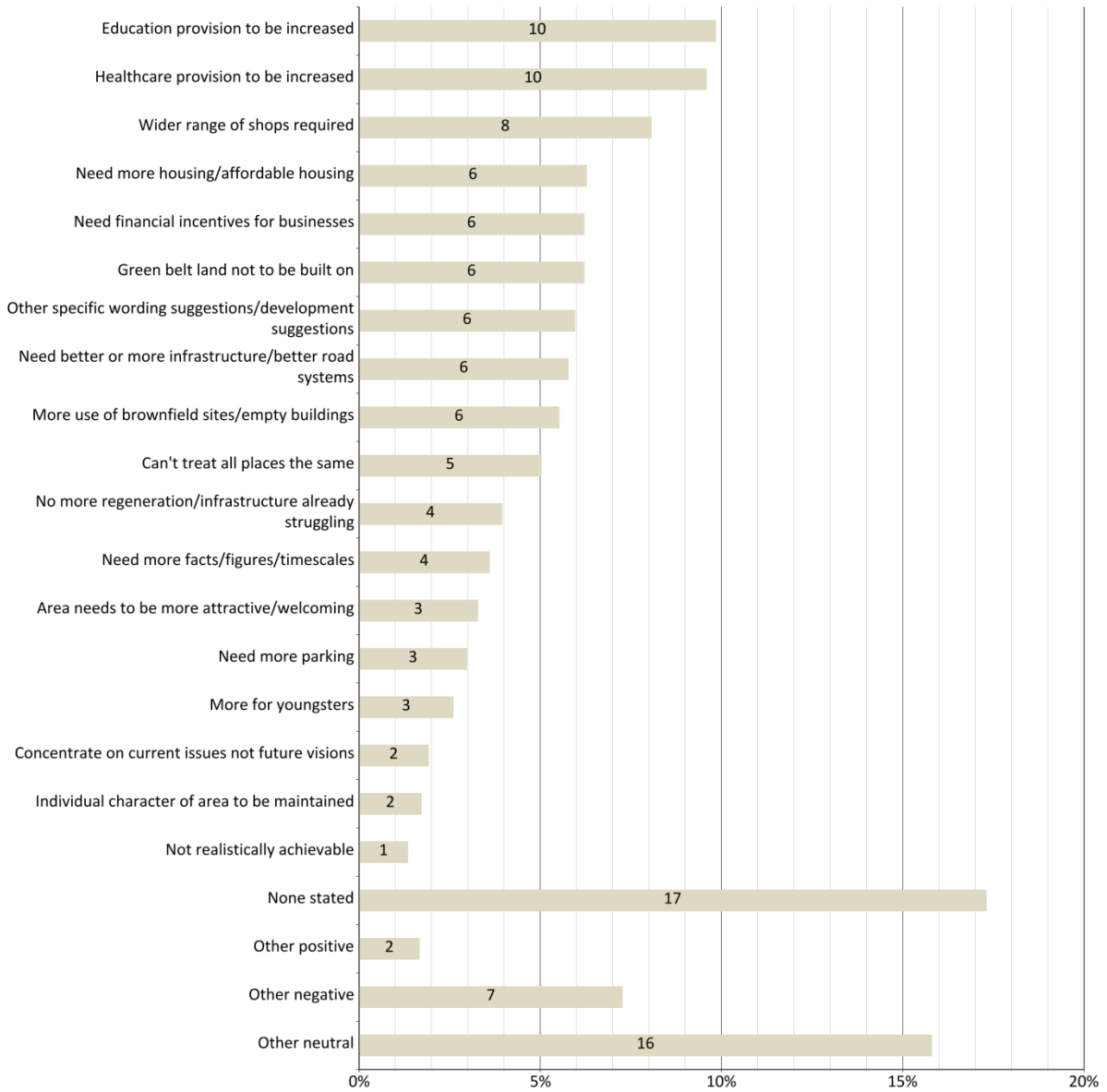
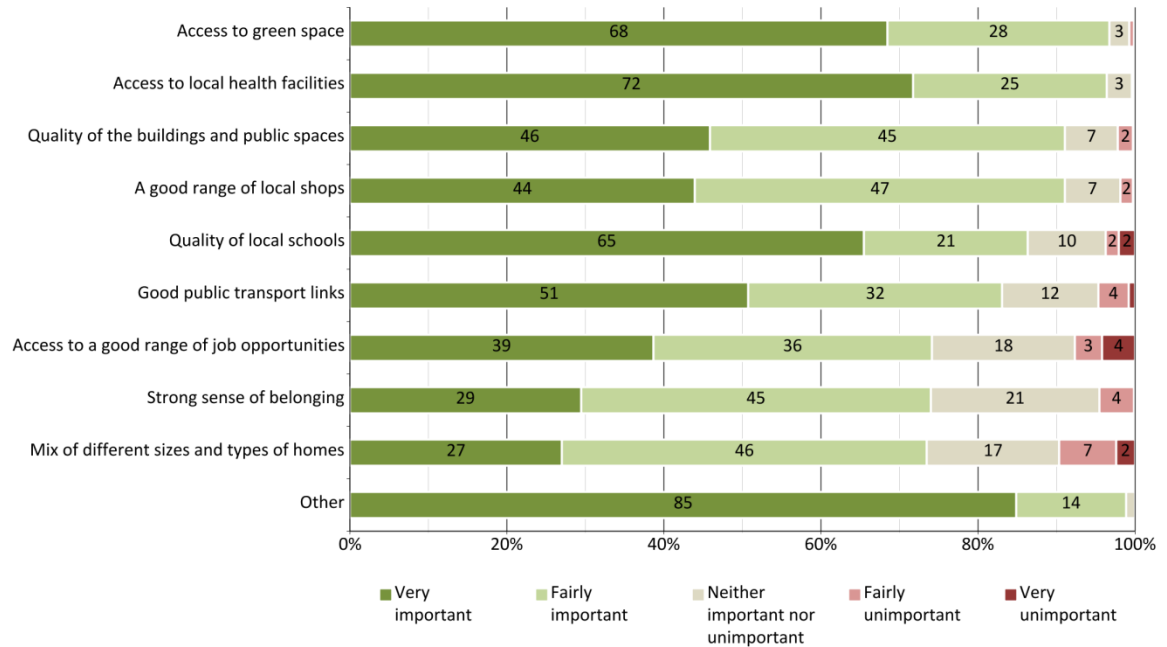


Figure 3: Q1 (C) Please also specify the change(s) you think should be made.
Base: All Residents who disagreed with all or part of the strategy (151)



The Local Neighbourhood/Area

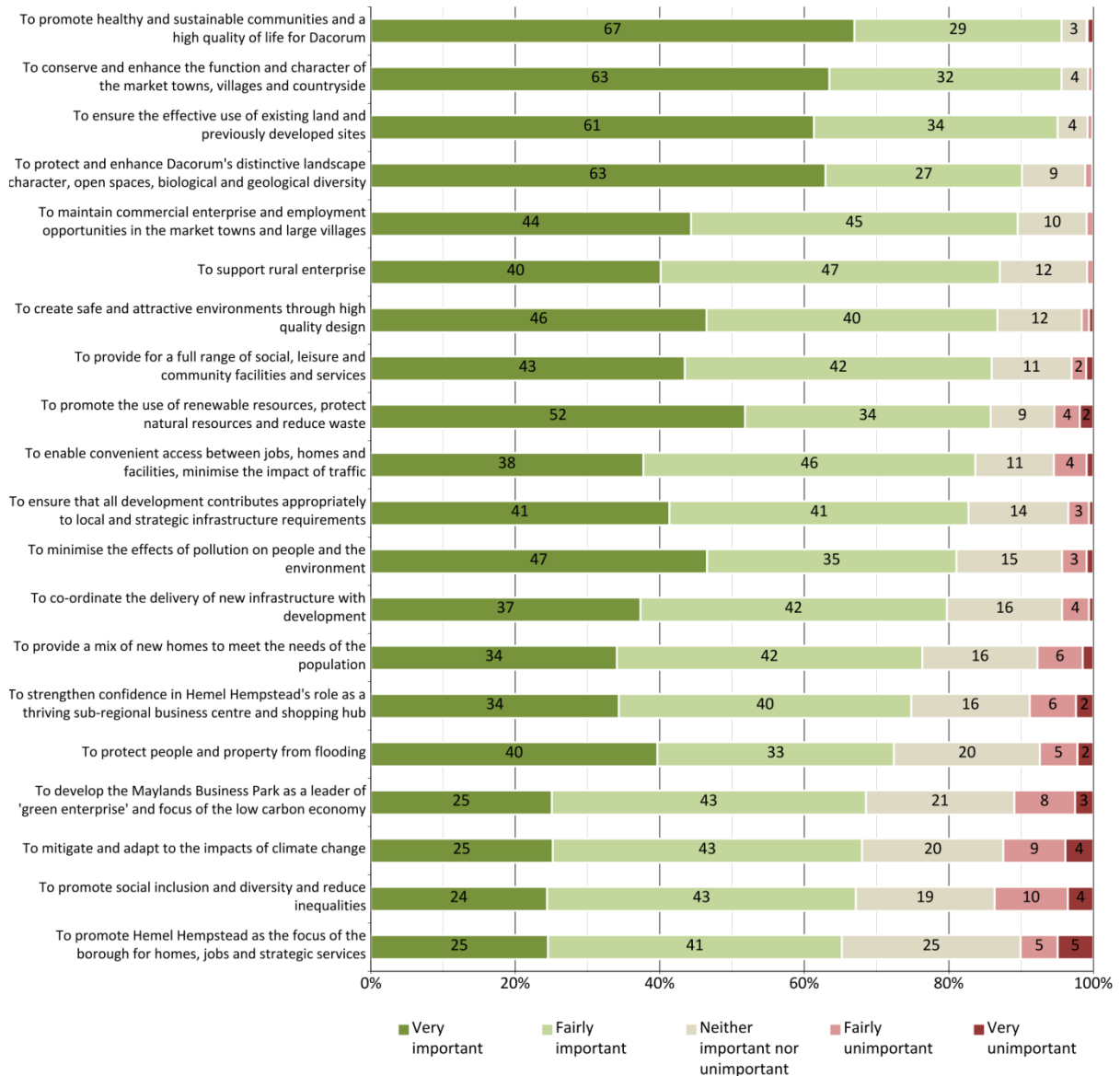
Figure 4: Q2. We are interested in what you value most about the neighbourhood/area in which you live. How important or unimportant are the following aspects to you? If Value < 2 figure is not shown.
Base: All Residents



Objectives

Figure 5: Q3. To help us take our Borough vision forward, we have a number of objectives. How important or unimportant are the following objectives? If Value < 2 figure is not shown.

Base: All Residents



Housing Targets

Figure 6: Q4. A number of conflicting social, economic and environmental factors need to be considered when choosing the most appropriate housing target for the area. Please indicate how far you agree or disagree with the following statements. If Value < 2 figure is not shown.
Base: All Residents

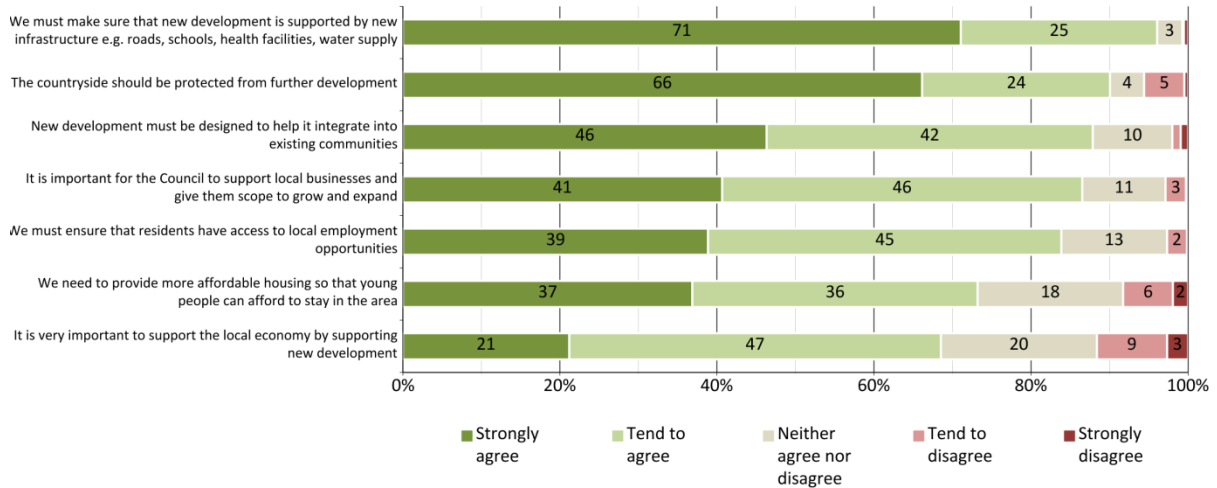


Figure 7: Q5 (a) Which annual housing target do you support?
Base: All Residents (482)

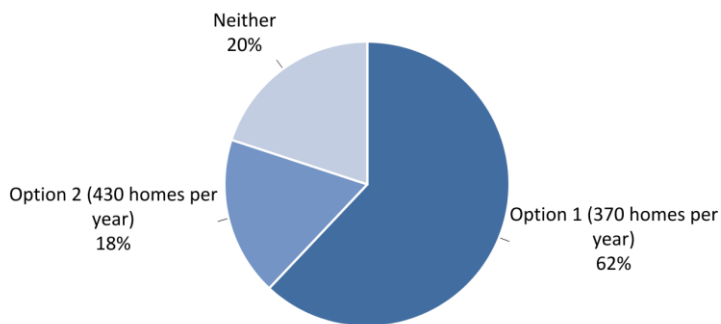


Figure 8: Q5 (b) Please state what you think the target should be.
Base: All Residents who didn't support either housing target (96)

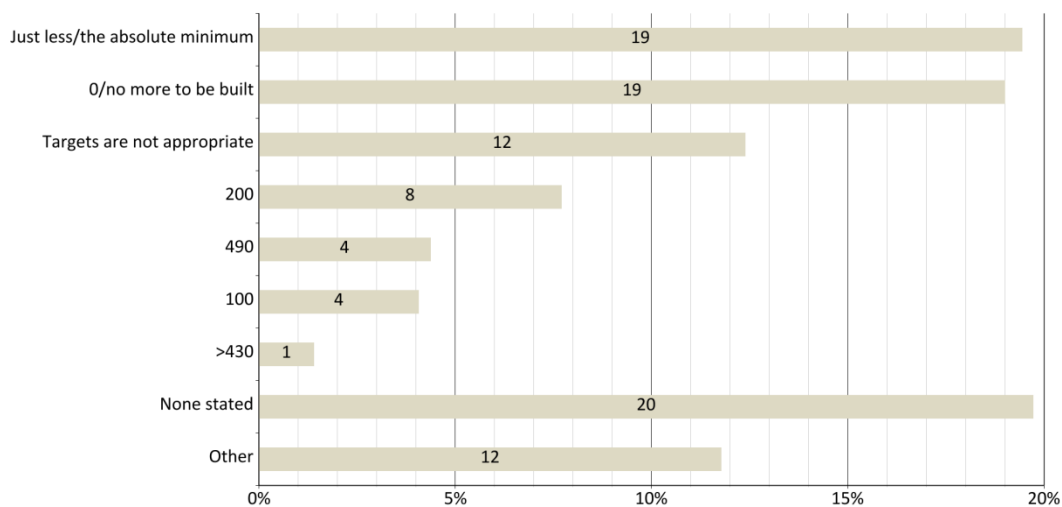
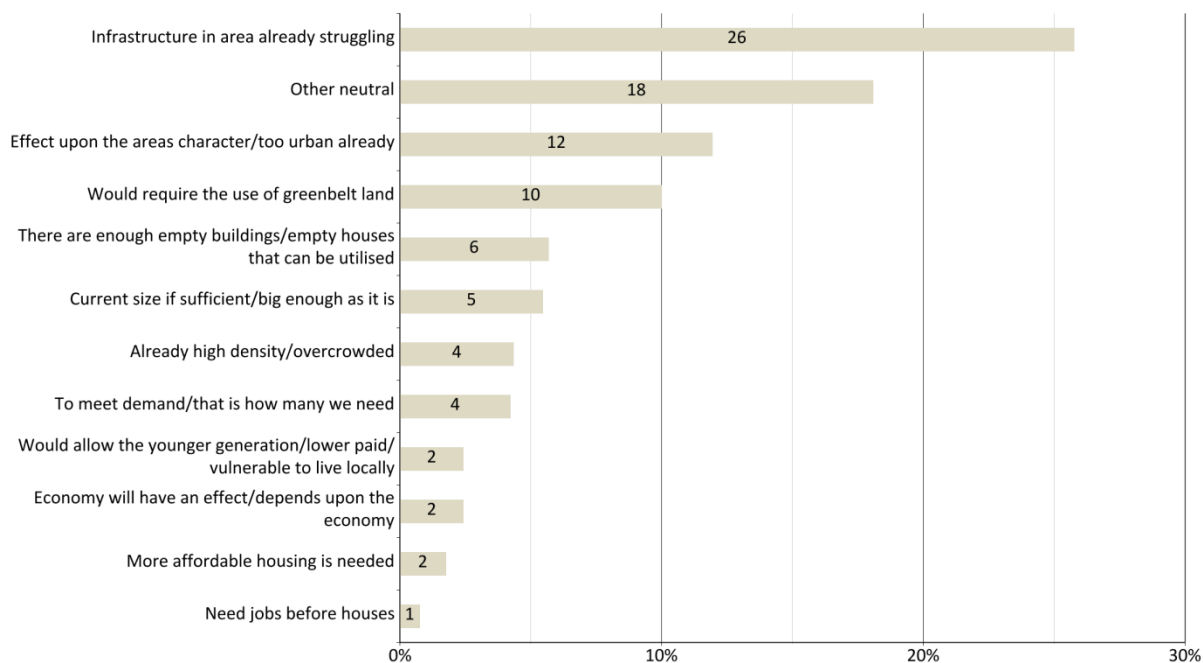


Figure 9 Q5(c): Please give reason(s) for your answer.
Base: All Residents who didn't support either housing target (88)



Priorities

Table 8: Rank order: Q6. Please specify which of the following you consider to be the top 5 regeneration priorities for your local area. Most Important

Regeneration Priorities	Rank Order
Making better use of derelict / run-down land	1
Quality of local open space e.g. parks	2
Street cleaning and litter collection	3
Provision of affordable housing	4
Improving community facilities	5
Improving public transport	6
Improving the availability of car parking	7
Quality of buildings and the built environment	8
Promotion of renewable energy generation	9
Tree planting and landscaping	10
Improving the management of existing parking e.g. through enforcing 'no waiting' rules and preventing parking on double yellow lines	11
Investing in sports facilities	12
Other	13
Improved street lighting	14
Public art	15

Table 9: Rank order: Q7. Where do you think the focus for regeneration within the borough should be? Most Important Focus for

Regeneration	Rank Order
Town centres	1
Wherever the need is greatest	2
Residential areas	3
Employment areas	4
Neighbourhood and village centres	5
Green spaces	6
Other	7

Appendix 3

Hemel Hempstead Town Centre Workshop



Hemel Hempstead Master Plan Charette

Report on the participatory workshop event held
on 25.01.11 at Felden Lodge, Hemel Hempstead

February 2011

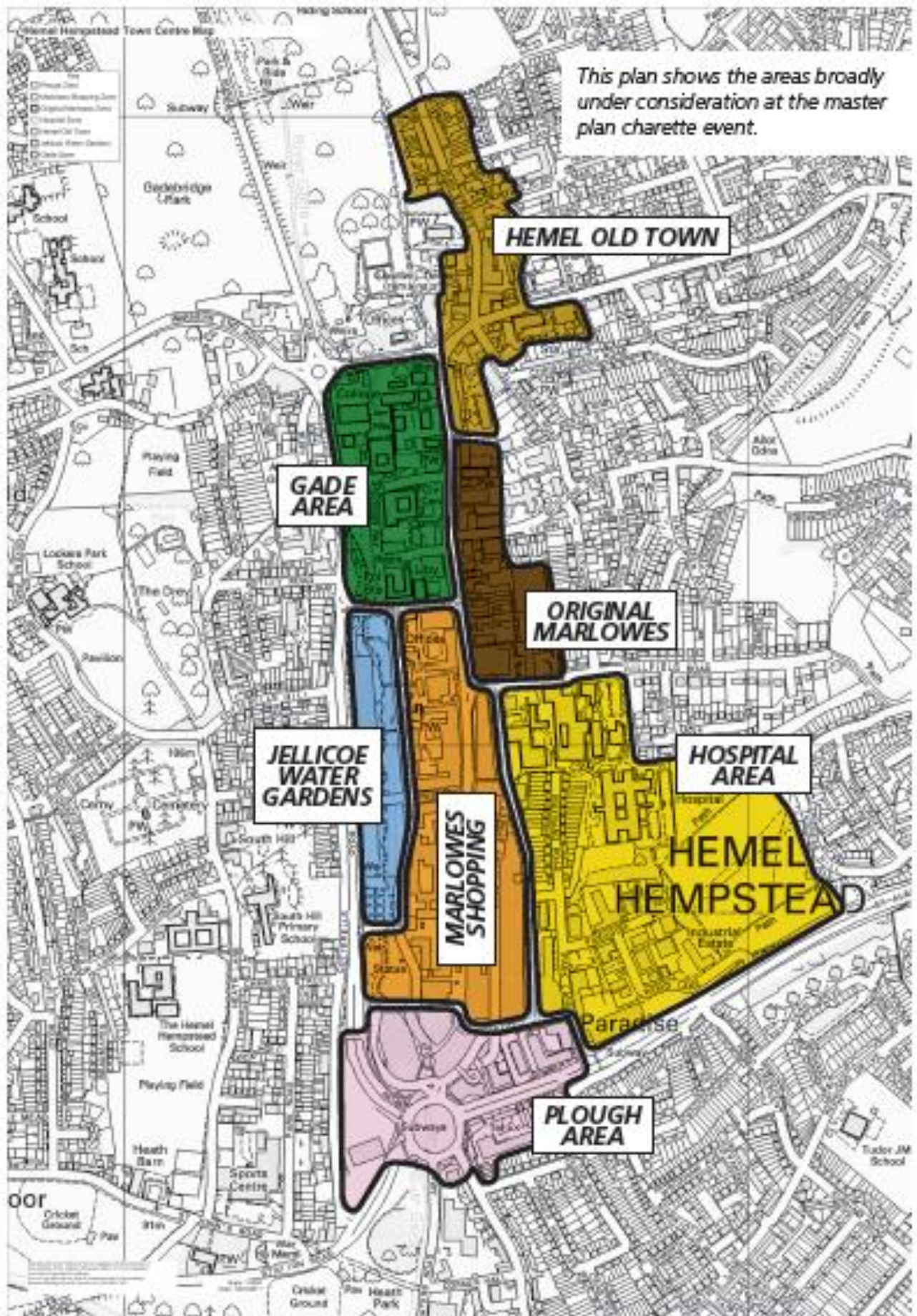


Hemel Hempstead Master Plan Charette

Report on the participatory workshop event held
on 25.01.11 at Felden Lodge, Hemel Hempstead

February 2011





About this report

This report has been produced by Inspire East as a record of some of the key themes and ideas that emerged from the master plan charette, held in the town in January 2011. It does not seek to make any firm proposals nor does it try to set out any confirmed way forward for a master plan for Hemel Hempstead. Instead, it should be considered an input to the ongoing master planning process.

The charette event was designed to stimulate ideas, listen to a range of voices and views and develop a momentum that will help sustain the subsequent stages of the master planning process. This report should be seen as a continuation of this.

Master Plan Charette — 25.01.11

The workshop was structured around four key questions and these are reflected in the structure of this short report. They were as follows:

- 01 What sort of town do we have?**
- 02 What sort of town do we want?**
- 03 What are our strengths and opportunities?**
- 04 How do we make the changes we need?**

Using some simple graphics, the report then sets out some of the key design ideas and thinking that can be used to inform subsequent stages of the master planning process:

- 05 Design principles and strategies**
- 06 Conclusions and next steps**
- APPENDIX List of workshop participants**

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Faye Tomlinson +44 (0) 20 7070 6700 *Commission for Architecture and the Built Environment*

01 What sort of town do we have?

“There are some good examples of 1960s design such as the Civic Centre and Bank Court, these do give us a sense of identity”

“The ‘magic roundabout’ is quite iconic but it does create a poor pedestrian environment”

“Boxmoor area is lovely but often not seen as being part of Hemel Hempstead”

“We have lots of car parking, which is great but walking around the town isn’t as easy as it could be”

Every group felt the Water Gardens were a prize asset for the town but more could be done to celebrate them

“There are in interesting artworks dotted about the town, a legacy of the 1960s design”

“The under-utilised Market Square provides a great redevelopment opportunity”



“It’s a long walk from the riverside parks to the Old Town — how can we make this feel shorter?”



“We don’t have many independent retailers — we are a bit of a clone town”



“There are some relatively wealthy residents here but they tend to spend their money in other towns”



“The Old Town is buzzing at night”

“The original town plan by Sir Geoffrey Jellicoe (1900–1996) was brilliant but it has not really been looked after”



Images from the charette held at Feldon Lodge on 25.01.11

01 What sort of town do we have?

02 What sort of town do we want?

// The Dutch have a tradition of effectively integrating buildings with water //



// Contemporary bus stations, such as those in Bury, Norwich and Oldham can be architecturally striking and also offer retail and civic uses as part of their design //



// Water gardens are at their best when associated with high quality development //

// Buildings, water and light can be a potent combination //



Images used at the charette held at Falden Lodge on 25.01.11



“We want a place that makes the best of the water”



“We want a place with history but our Old Town is disconnected from the the New Town”

“We want to embrace modern design, as reflected in our New Town status”



Images from the charette held at Falden Lodge on 25.01.11

02 What sort of town do we want?

02 What sort of town do we want?



“Milton Keynes Hub is a great example of vibrant new mixed-use”

“Florence has the ability to delight at every turn”



“High Wycombe library has become a real focus for the community”



“Welwyn Garden City celebrates green space brilliantly”

“The St Albans Market brings the high street to life”



Images generated at the charrette held at Feldon Lodge on 25.01.11

02 What sort of town do we want?



// Berkhamsted is a high quality place because of its healthy and lively high street environment //



// Bruges has a fine network of lanes and streets, linked with water //

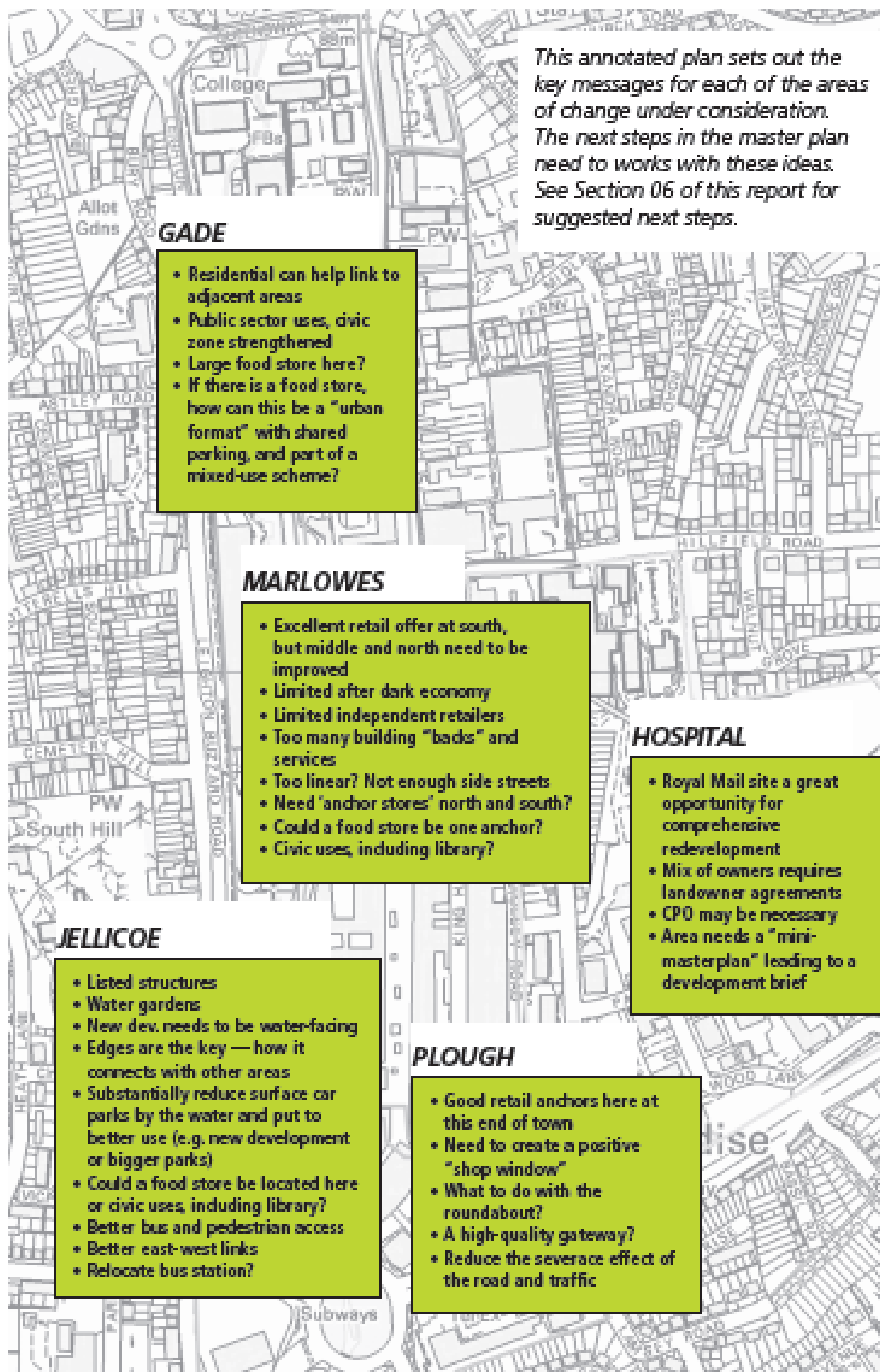


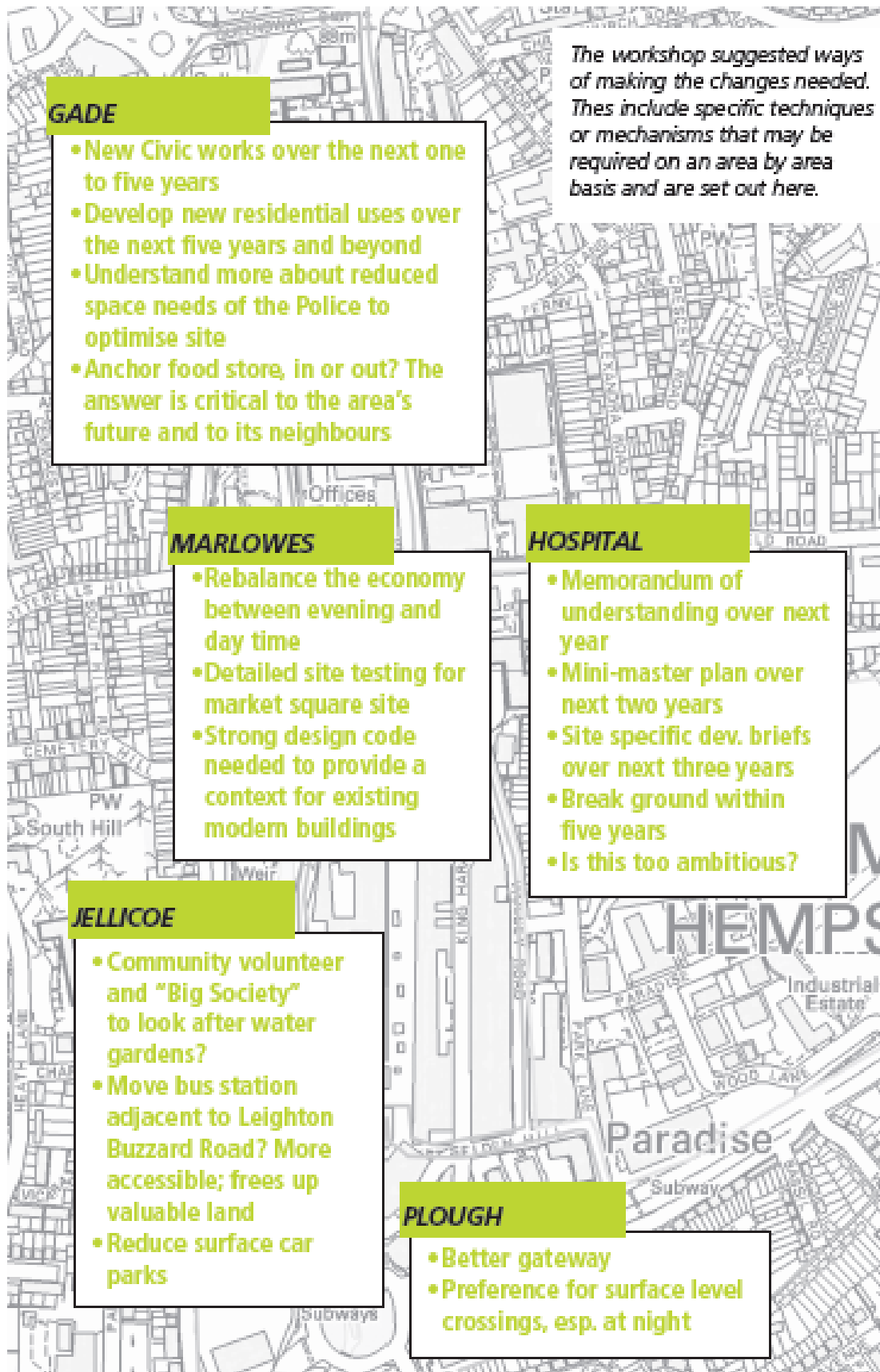
// Oxford has a mix of pedestrianisation and bus access on Cornmarket that works well //



// Winchester uses its green space in a really productive way, linking it with architecture //

Images generated at the charrette held at Feldon Lodge on 25.01.11

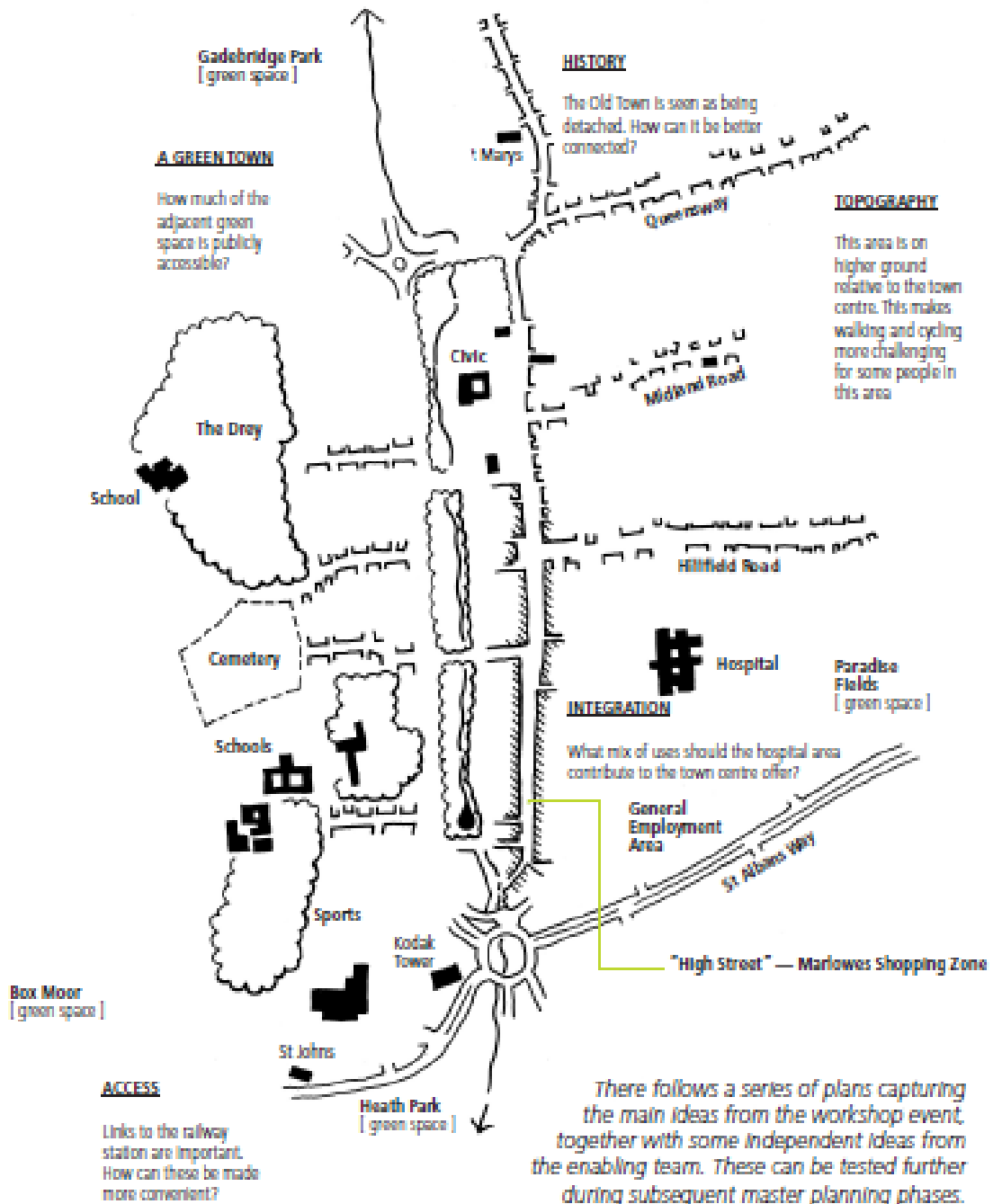




04 How do we make the changes we need?

The ingredients of place

This "New" Town is maturing and has an established infrastructure of built and green forms that comprise the town today. The master plan should seek to actively manage and promote positive change through careful interventions over time.

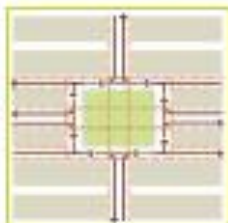
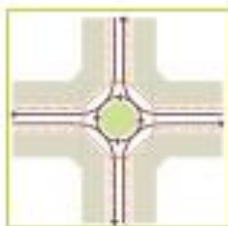


Series of linked spaces

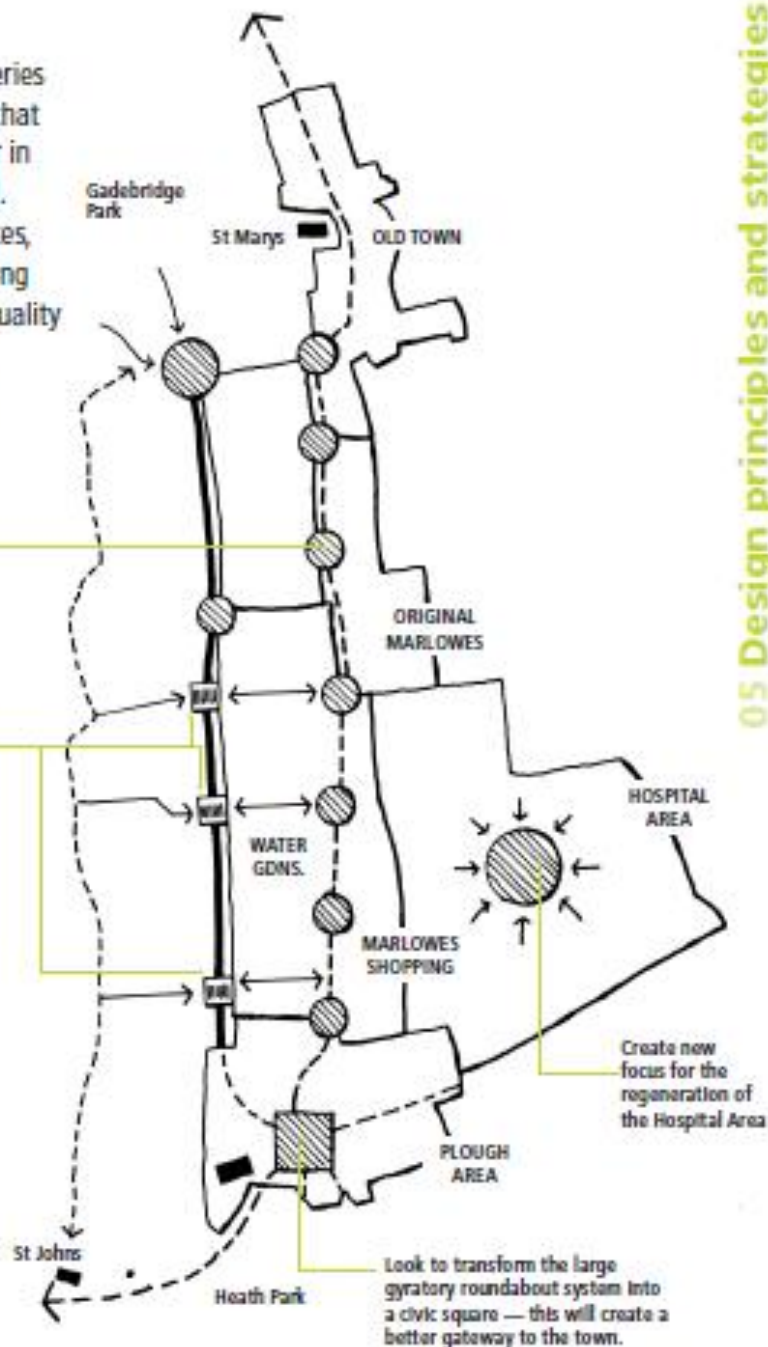
The town should comprise a series of linked spaces, or "events", that will help make the town easier in size and shape to walk around. These could be large civic spaces, small junction spaces, interesting green spaces and other high quality designs that connect together effectively for the pedestrian.

Look to establish a regular sequence of "events" or "moments" along the route between Old Town and Marlowes. This will create a sense of place and shorten the psychological distance between the two areas.

Determine location for "breaks" in the Leighton Buzzard Road to create better links to the town centre. These need to be at grade crossing, not subways or bridges.

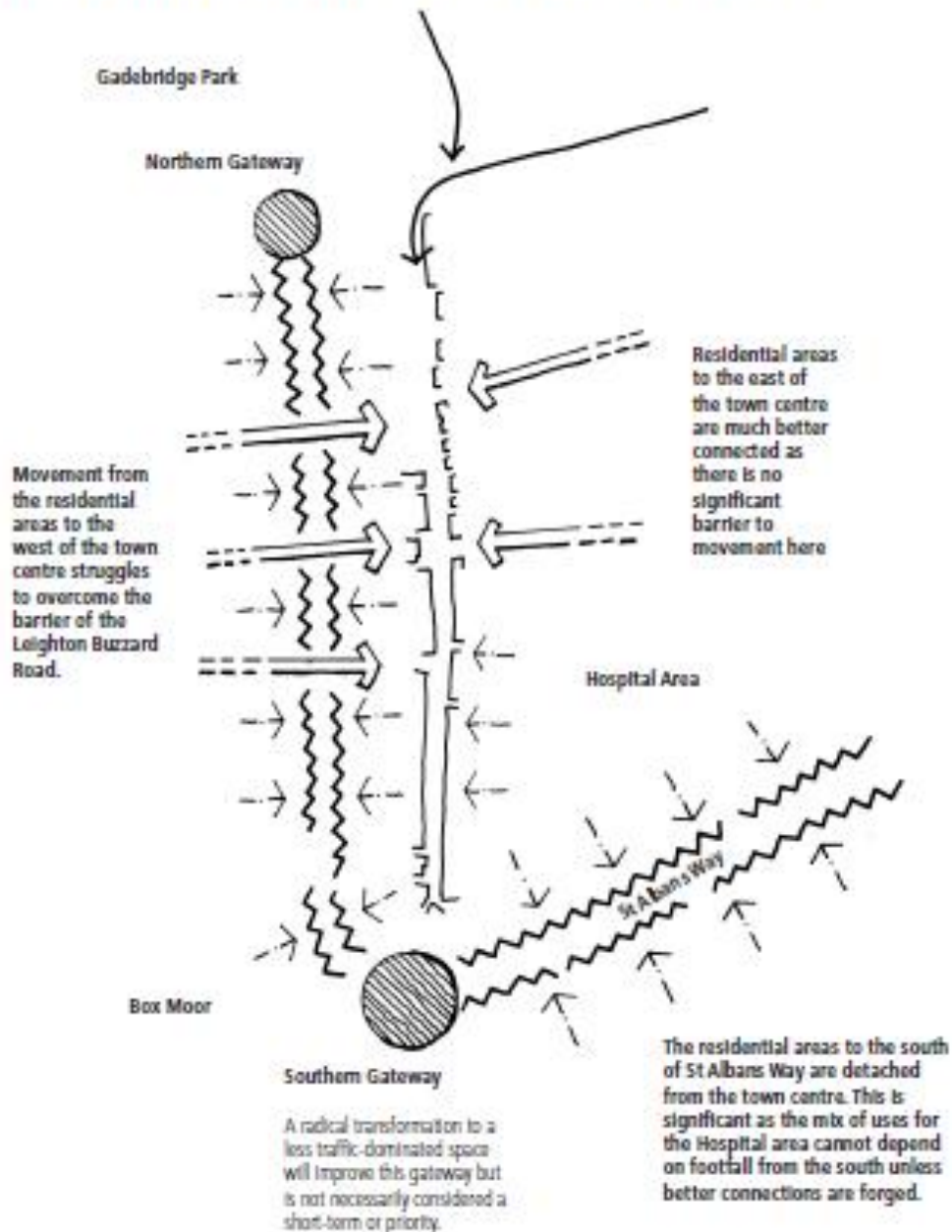


CONCEPT DIAGRAMS: Consideration should be given towards the reworking of the gyratory into a civic square. Vehicle capacity and flows need not be compromised but a much better sense of arrival, together with a people-focused place and greater development opportunities, could be delivered.



Barriers to movement

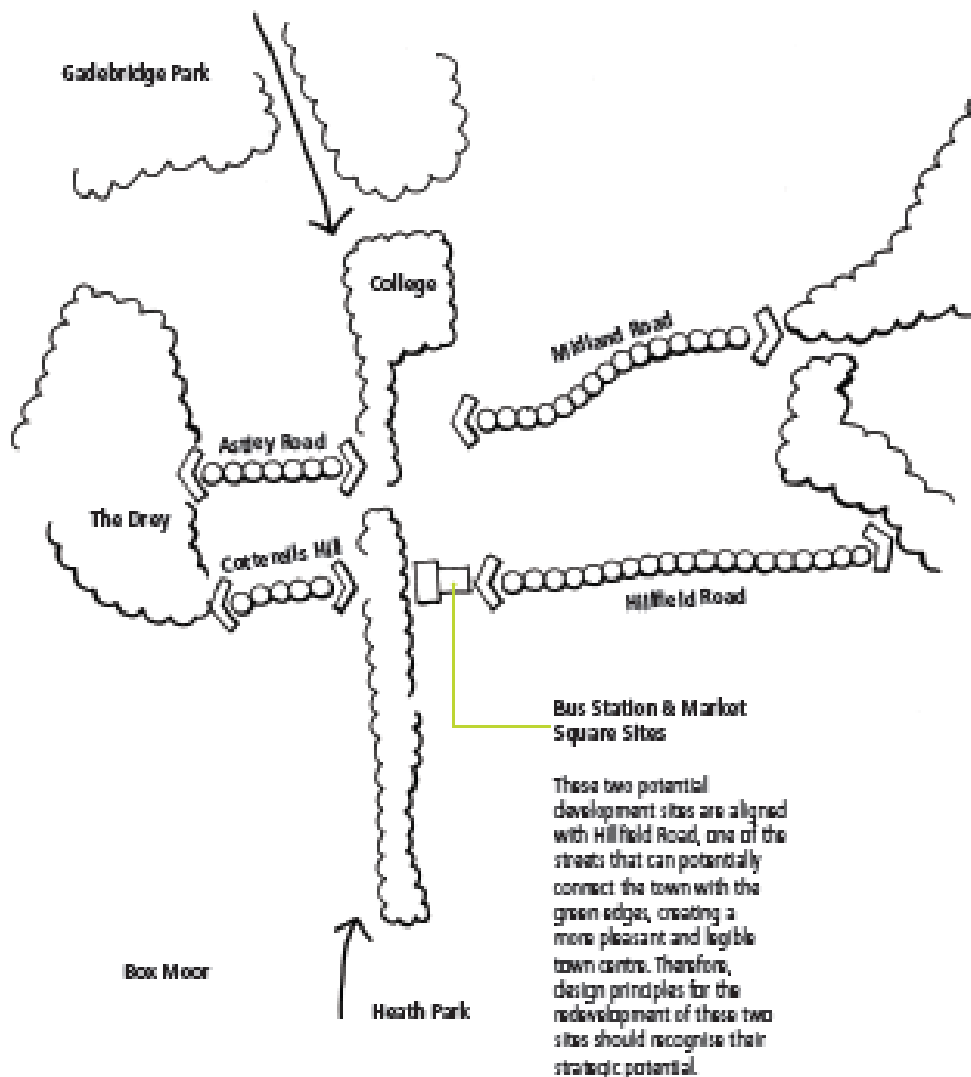
The town centre is relatively inaccessible from the west and south due to the severance effect of two busy roads, the Leighton Buzzard Road and St Albans Way. Many participants at the workshop said that those living only a short walk from the town centre would often drive to other towns for their shopping, deterred from walking to the town centre by the poor quality street environment.



Connecting the green edges

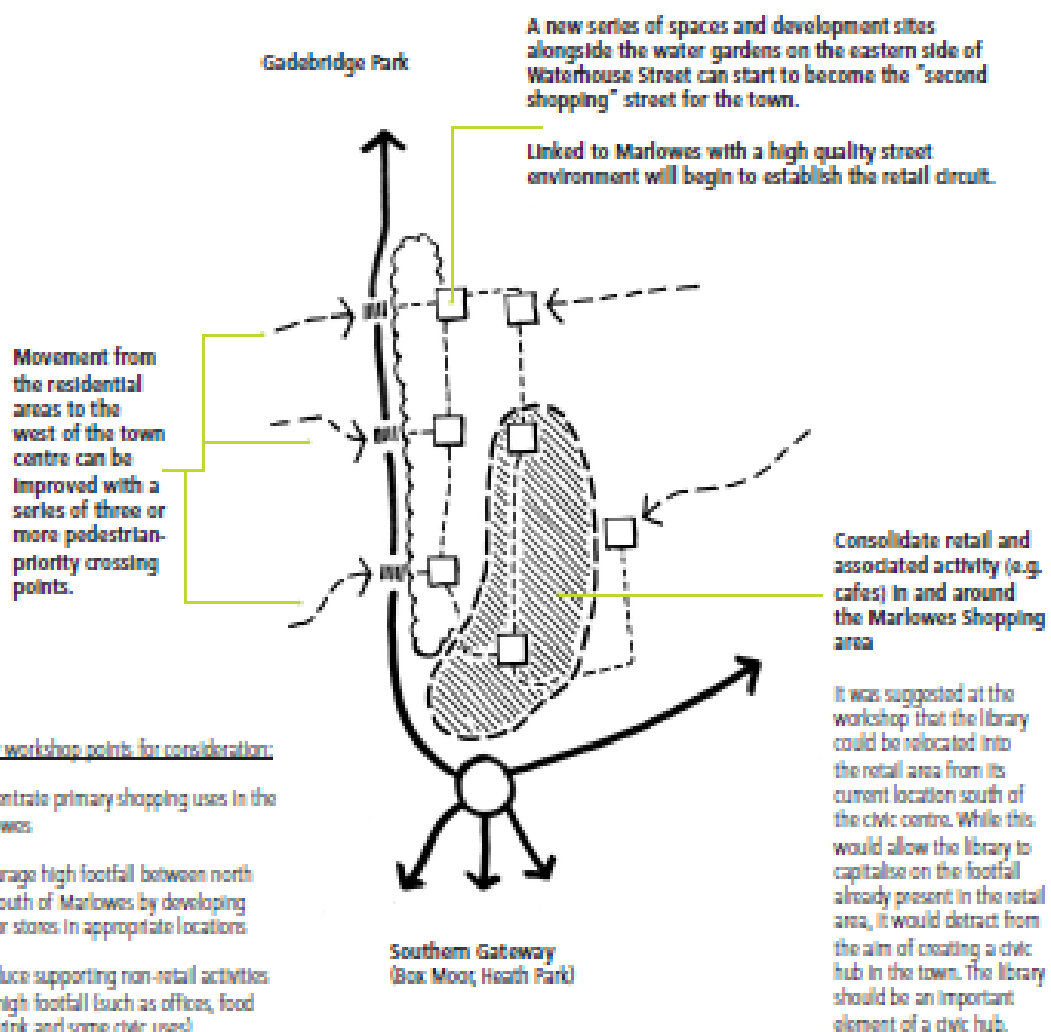
One of the most prized characteristics of the town centre is the "green spine" of the water gardens, running north-south. To the west of the town centre are playing fields and woodlands and other private and public green spaces. To the east, other green wedges link the town to open countryside.

The greening of four key streets would connect the town centre to these existing green edges, helping make the town centre more pleasant and more legible to residents and visitors.



Pedestrian circuits

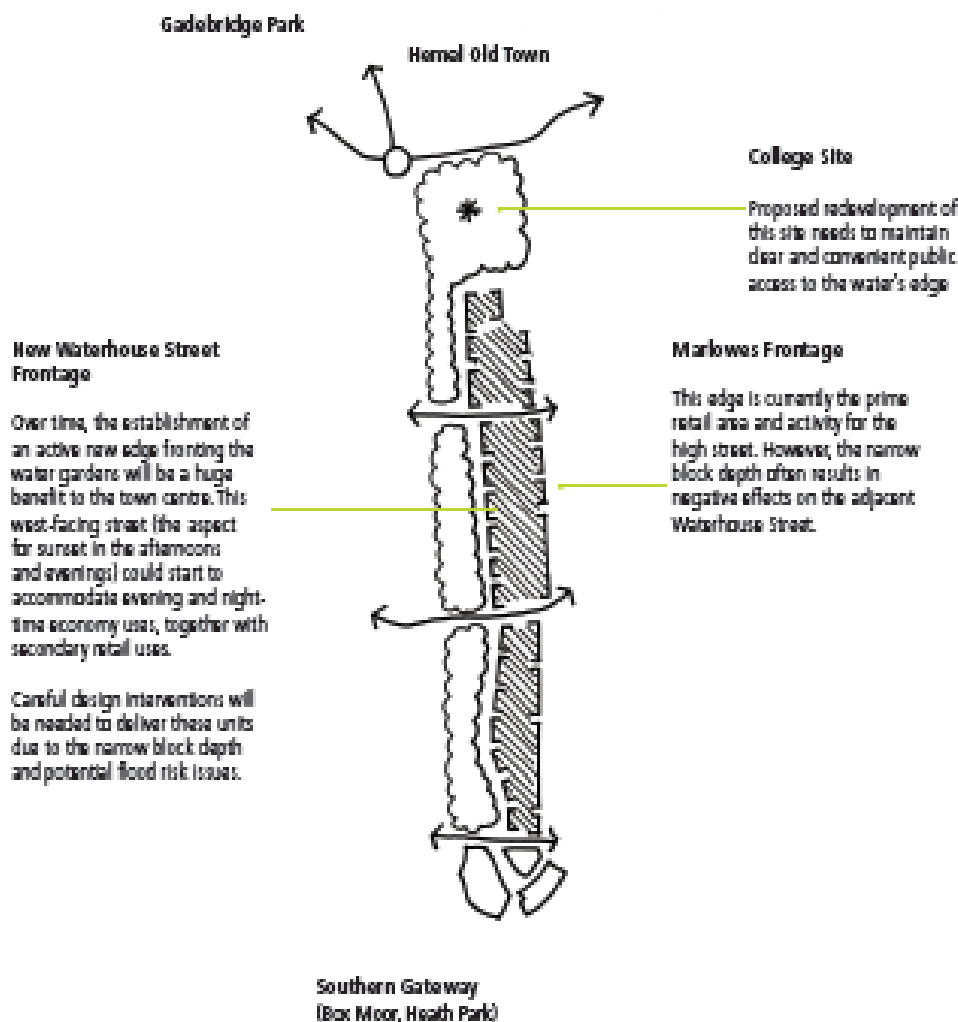
One of the identified weaknesses of the town is the lack of any retail circuits. The long linear nature of the town means that the Marlowes Shopping area does not connect to side roads and other secondary retail areas. Some of the other towns perceived as being positive places to learn from have both "high street" big name retail in the heart of the town but also independent retailers on adjacent streets. Creating a circuit for Hemel Hempstead may encourage a more varied retail offer in the town centre.



Fronts and backs

While the water gardens are a prized asset in the town centre, and rightly so, they suffer from a lack of an active street overlooking their eastern edge. Waterhouse Street comprises many building backs and service yards, leading to a poor quality pedestrian experience in places.

However, there are also redevelopment opportunities along here. Design principles for these opportunity sites must work to deliver a positive edge fronting the water gardens, with active ground floor uses.



Next steps

#01. Clearly define the purpose and scope of the master plan.

While a good quality master plan will undoubtedly give Hemel Hempstead a clear vision for the future and its direction of travel as regards expansion, change and reinvention, it also needs to be pegged effectively to the statutory process if it is to have real authority and strength. These processes could include the Core Strategy and associated Local Development Framework outputs, such as a Town Centre Area Action Plan (TCAAP).

It could also link to nascent processes and frameworks, such as neighbourhood plans, locally delivered plans and design statements — as encouraged through the recently announced “Localism Bill”. Therefore, the structure, timing, scope and depth of the master plan needs to be in accordance with the needs and regulations that govern these other parallel outputs. The sooner these requirements are understood and defined, the sooner the next steps in the master plan process can be agreed to ensure that it can “plug into” these other documents to be as effective as possible, as widely as possible.

#02. Reconvene the workshop group.

The enthusiasm and goodwill of the workshop participants has given the master plan process a momentum and sense of purpose. The suggestions and contributions that the groups made throughout the day are critical to the formulation of future ideas and proposals. However, a further significant benefit of the workshop format is the shared sense of ownership and purpose they bring to the process.

To capitalise on this, it is recommended that this group is reconvened to test and refine ideas, to learn and understand more about why decisions have been taken by the authority and continue to provide advice and inputs to ensure the master plan is robust yet creative. In this way, the group can become a vital sounding board for ideas, a core contributions group and they can become ambassadors for the emerging master plan, able to communicate the ideas to the wider community.

It is acknowledged that the organisation and preparation required for large participatory workshop events of this type needs time and resources. Therefore, it may be that the master plan work programme cannot accommodate such events on a frequent basis and a series of smaller topic-based working groups could be used as an alternative.

#03. Ensure greater community involvement.

While the continued use of the main workshop group will be of huge benefit to the master plan process, there may also be a need for smaller “outreach” groups within more localised or specialist community groups. These could include traders associations (including specialists such as a night-time economy grouping of bars and restaurant owners) or groups that are

This section sets out a series of recommended next steps for the master planning process following the successful workshop event. Some of these actions may already be in hand, others may be brand new while others may be linked more effectively to the next steps in the process.

considered “hard to reach” such as the BME or LG&BT community. These groups may need to be engaged with on their own terms, such as part of a scheduled meeting in their own community (e.g. an agenda item at a monthly Pubwatch meeting).

Also, the residential communities closest to the town centre may also have residents associations, neighbourhood groups or similar. These too should be engaged at the right time, and their views be used to support and complement those from the larger more broadly-based and representative main group. Understanding and responding to the wishes and concerns of these smaller groups will be made much easier within the context of the more representative group, rather than having to respond to them on a group by group basis.

#04. More detailed design and viability testing of the proposed mix.

The list of proposed uses that have been put forward as ideas for each of the areas of change, and for the town centre as a whole, provide a good starting point in reflecting the wishes of the community. However, they cannot be developed further without a further testing of the mix. This includes economic and viability testing alongside a “sense of place” testing. Each of the defined areas, needs to develop a sense of identity, in part driven by the mix of uses.

These zones or areas are likely to have a particular emphasis on retail, commercial, civic, residential and night-time economy. How much of each element is required to deliver that identity? How much is too much? How can places avoid being too “mono-cultural” — e.g. so retail dominated it becomes dead after dark — but still retain a focus and be a destination? Alongside this is the need to understand the values generated by the various options and the impacts this will have on deliverability and viability. Therefore a joint team of economists and designers should be in place to continue to refine this aspect of the master plan. Results should remain in the form of options at this stage to be considered by the reconvened workshop group (see #02) at the appropriate time.

#05. More detailed design at the quarter/zone level.

The workshop could only touch on design at the most strategic level. It is therefore recommended that more detailed design testing on the various opportunity sites is undertaken in subsequent phases. This will start to establish a greater understanding of site capacities, constraints and opportunities and the ability to integrate sites with one another and with adjoining areas. This design work needs to look at topography issues, a major influencing factor towards the east of the town centre, as well as interventions to make streets and spaces more pedestrian and cycle-friendly — a major concern of the workshop.

This more detailed design testing could be delivered as part of the need for greater testing of the mix of uses. See #04, above.

#06. Integrate existing works effectively with the master plan.

The workshop received very useful contributions from the consultants already working in the town on the revitalisation of the Marlowes Shopping Zone. This work, and other works regarding the relocation of uses, the renewal of streets and spaces and other changes to the urban environment are no doubt already underway. The development control department of Dacorum Borough Council will receive a steady stream of applications during the master plan process. Places do not stay still, change is always happening — and the emerging master plan needs to recognise this. Therefore, a next step in the process need to integrate these existing works in a way that helps ensure the master plan reflects the realities of change already underway.

It is also critical that the master plan process keeps an eye on these existing changes and evolutions and checks them for conformity with the aims and objectives of the master plan. In instances where ongoing change, or proposals for change, appear to be at odds with what the master plan is likely to seek to achieve, the local authority needs to be confident enough to intervene. It may be that slight adjustments are all that is required or maybe more fundamental change is required. In instances when more fundamental change is needed to avoid a major conflict with the master plan, the links with the statutory process, and therefore policy, need to be clear. Legal advice may be necessary in such instances. See #01.

#07. Be prepared for unexpected opportunities to arise.

While the master plan needs to incorporate and integrate on-going change, and challenge it when it may undermine the aims and objectives of the master plan, it should also be flexible enough to respond to unexpected change. This could include windfall sites coming forward unexpectedly during the process. The master plan team needs to be prepared to rethink and reconsider what may have previously been considered “fixes” in the process to accommodate such opportunities.

In doing so, careful regard needs to be had for the community engagement aspect of the process (see #02 and #03) and the potential need to revisit community groups and the main group to explain how such an unexpected opportunity may lead to the reworking, adjustment or even abandonment of ideas or concepts that had previously been considered agreed or fixed.

#08. Transport ideas must support, not lead.

There was considerable debate during the workshop surrounding the role of streets, roads and the private car. There is clearly a need for a sustainable and innovative access and movement strategy for the town centre. However, it is vital this is not developed in isolation from the master plan, nor in isolation a the place-making strategy for the town. The key message here is this — transport solutions are a means to deliver and support the vision; they are not an end in themselves.

Local authority officers responsible for transport matters must therefore be fully integrated into the master planning team and be present at all events in the process. These professions often hold the key to many of the likely objectives of the master plan, such as integrating sites and creating more people-friendly streets and spaces. It may be necessary for Dacorum BC to appoint external access and movement specialists to assist with this work — to challenge perceived thinking, to collaborate with the design and economic testing (see #04, #05 and #06) and to explain to the stakeholder groups the concepts behind the emerging access and movement aspects of the master plan.

List of workshop participants

Mrs	Nathalie	Bateman	Dacorum Borough Council
Mr	Colin	Black	on behalf of Inspire East
Mrs	Chris	Taylor	Dacorum Borough Council
Mr	Dan	Durrant	Inspire East
Mr	Richard	Eastham	on behalf of Inspire East
Mrs	Heather	Overhead	Dacorum Borough Council
Mr	Riccardo	Bobisse	JMP Consultants
Mr	Nigel	Dent	LCDI
Mrs	Yvonne	Edwards	DM Officer
Mr	John	Fannon	Dacorum Borough Council DM and BC Manager
Mr	Paul	Harris	Friends of the Earth
Mr	David	Mahon	Hemel Hempstead Police Station
Mrs	Lizzy	Staincliffe	Dacorum Borough Council SD Officer
Ms	Faye	Tomlinson	Cabe
Mr	Nigel	Brooke	V4 Services
Ms	Anna	Parr	Environment Agency
Mrs	Claire	Covington	Dacorum Borough Council
Mr	George	Edkins	HP Housing Association
Mrs	Anne	Gover	HCC Libraries
Mr	Ian	Potter	Herts Police Estates Dept.
Mr	Ian	Richardson	Boxmoor Trust
Mr	Paul	Smith	JMP Consultants
Mr	Duncan	Murray	The College
Mr	George	Barnes	Knight Frank
Ms	Alison	Ford	Jobcentre Plus
Mrs	Marie	Green	Jobcentre Plus
Ms	Joanna	Hall	Riverside Manager
Mr	Tim	Johnson	Salvation Army HH Corps
Mrs	Kate	Lang	Dacorum Borough Council
Ms	Christa	Masters	Montagu-Evans
Cllr	Michael	Moore	Hemel Hempstead Town
Mr	Andy	Morris	Quarterbridge
Ms	Jackie	Rose	HCA
Mr	Vince	Williams	Marlowes Manager
Mr	Mike	Evans	Property Services
Mr	Bernard	Giraud	Town Centre Partnership
Mrs	Pam	Halliwell	Dacorum Borough Council
Mr	David	Hughes	HCC Key Sites and Regen.
Mr	Guy	Ingham	Knight Frank
Ms	Sue	Prowse	Dacorum Borough Council
Mrs	Julie	Still	Dacorum Borough Council
Mr	Matthew	Wood	HCC Corporate Serv.
Ms	Jenny	Applestone	HCC - PTU
Mr	James	Doe	Dacorum Borough Council Assistant Director
Mr	ken	Hargreaves	ARRIVA THE SHIRES
Cllr	Stephen	Holmes	Portfolio Holder
Ms	Tobi	Manikin	Diverse HR Solutions
Mr	Sanjay	Patel	Herts Highways
Cllr	Andrew	Williams	Dacorum Borough Council Cabinet
Miss	Laura	Wood	Dacorum Borough Council Strategic Planning

Appendix 4

Schedule of Changes to the Core Strategy arising from Technical Evidence and Other Considerations

Appendix 4: Schedule of Changes to the Core Strategy arising from Technical Evidence and Other Considerations

Notes:

- Changes arising as a direct result of consultation responses are included in Appendix 1 of Volume 6 (Annex A) of the Report of Consultation.
- To obtain a full picture of the changes made, these two schedules need to be read together (there is some overlap).

		REFERENCE	CHANGE	REASON	
GENERAL AMENDMENTS					
<ul style="list-style-type: none"> General editorial changes. Amend term 'Local Development Framework' to 'Local Planning Framework.' Delete "how we have got to this point" text. Delete questions. Update all document references as appropriate. Update references to groups / organisations where these have changed. Update text referring to Draft Core Strategy with references to Pre-Submission document. 				For general updating and clarity and to reflect move from Draft Core Strategy to Pre-Submission stage.	
CONTENTS					
	1.	Introduction to the Consultation	-	Update introduction and refer to as 'Foreword.'	To reflect move to the Pre-Submission stage.
	2.	Summary of the Strategy	-	Update summary of strategy.	To reflect changes made to theme chapters particularly regarding the housing target, jobs target and references to employment floorspace and developer contributions.
		Key diagram		Add Flaunden, and name Flamstead correctly.	To correct mapping error.
PART A - CONTEXT					

	3.	Introduction	Figure 1	Update diagram	To reflect imminent introduction of Neighbourhood Plan tier and changes to system outlined in Draft National Planning Policy Framework (NPPF) and draft Regulations.
			Figure 2	Update	To reflect progression to pre-submission stage.
			Para 3.3	Reference to East Hemel Hempstead Area Action Plan boundary.	Delete final sentence when a decision on the boundary in St Albans area has been taken by St Albans Council.
			Para 3.4	Refer to neighbourhood plans.	The Government has stated that neighbourhood plans will become part of the planning system.
	4.	Borough Portrait	-	Update factual information	To reflect most recent available data.
	5.	Challenges	Challenge 1	Delete reference to 'natural growth' of the population.	Reference is unnecessary.
			Challenge 3	<ul style="list-style-type: none"> • Delete reference to Performing Arts Venue and refer more generally to improved leisure and community facilities. • Delete reference to natural growth and refer instead to the level of in-migration. 	<ul style="list-style-type: none"> • To reflect changes to Hemel Hempstead Place Strategy. • To clarify terminology and better explain the decision the Council must make regarding new homes.
6.	Borough Vision	-	-	-	
7.	Strategic Objectives	-	-	-	

	8.	Other Plans	Figure 7	Add reference to the RSS and include footnote to explain its future status.	For clarity in the light of recent High Court judgements.
			Figure 7	Add reference to other relevant docs including: <ul style="list-style-type: none"> • Dacorum Delivery Programme • Local Enterprise Partnerships • Local Investment Plan 	For completeness.
			Para 8.2	Add reference to the fact that the SCS is under review but core objectives will remain.	For clarity.
PART B – THE STRATEGY					
The Sustainable Development Strategy	9.	Promoting sustainable development	Para 9.5	Update reference to Sustainability Advice Note	To reflect latest available information.
		The distribution of development	Table 1	Amend text relating to towns and villages to refer to a level of development that “enables the population to remain stable.”	For clarity and accuracy and to reflect Council decision on housing target.
		The location and management of development	Policy CS2	<ul style="list-style-type: none"> • Amend policy wording to reflect Council decisions in terms of housing numbers and treatment of local allocations. • Add reference to local allocations in the delivery section. 	For clarity and to reflect Council decisions.
			Policy CS3		
Para 9.16	Delete word ‘sequential.’	To reflect changes to Policy			

					CS2.
		The Towns and Large Villages	-	-	-
		The Countryside	Para 9.34	Simplify definition of the term 'affordable' by deleting reference to different housing categories.	To ensure consistency regarding terminology throughout the plan. The housing section and glossary will include the full definition.
			Policy CS5	<ul style="list-style-type: none"> • Add reference to the fact that no general review of the Green Belt is proposed, although local allocations under Policies CS2 and CS3 will be permitted. • Include reference to local allocations in the delivery section. 	<ul style="list-style-type: none"> • For clarity. • For completeness.
10.	Enabling convenient access between homes, jobs and facilities	Policy CS8		Delete word 'maximum' in clause (f) with regard to car parking standards.	To reflect changes in Government advice and ensure policy remains accurate if the existing approach to parking standards is amended through the Development Management DPD or other guidance.
		Policy CS10		Define 'landmark building' in a footnote.	To respond to advice from English Heritage - landmark buildings are not necessarily defined by their height, but by their distinctiveness due to design and location.

				Delete "identified from items (f) and (g)	In the light of advice from Development Management and to allow more flexibility in applying the policy.
			Policy CS11	Amend criteria to refer to attractive streetscapes and links between them, co-ordination of streetscape design and avoidance of large areas dominated by car parking	Following discussion with Development Management and to present the policy more clearly, emphasising good design features and avoiding excessive parking areas
			Policy CS12	Amend criterion (d) to accept the loss and replacement of important trees, if the loss is justified.	To ensure proper protection of appropriate trees.
			Paras 11.12-11.14	Minor changes	For clarity and to future-proof the document
			Policy CS13	Minor amendments.	For clarity and accuracy
			Monitoring indicator for Policy CS13	Amend monitoring indicators to refer to sustainability statement assessments rather than Buildings for Life Assessments.	To update/amend references to new guidance and methodologies.
Strengthening Economic Prosperity	12.	Creating jobs and full employment	Para 12.1	Insert footnote to refer to source of definition.	For clarity.
			Para 12.2	Replace paragraph with new information.	To reflect new advice from Roger Tym & Partners in the Dacorum Employment Land Update 2011
			Para 12.3	Insert new paragraph to explain that the forecast growth in jobs numbers is an estimate.	To reflect advice from Roger Tym & Partners in the Dacorum Employment Land Update 2011. The Council cannot physically create jobs

					through planning policy, so it is more appropriate for to refer to a jobs growth estimate rather than a true target. This figure will then be accompanied by policies that should enable jobs growth to occur at the planned level.
			Para 12.4	Remove 'relatively high' in reference to jobs forecast.	To reflect the significant decrease in the jobs forecast in the Dacorum Employment Land Update from the previous forecast of 18,000 jobs.
			Para 12.5	Clarify that the reference to "substantial employment growth" relates to Hemel Hempstead.	For clarity.
			Para 12.6	Replace reference to the 'Hemel 2020 vision' with reference to the 'Council's regeneration plans'.	In anticipation of the Council's plans to merge the Hemel 2020 projects into the broader Dacorum Development Programme (DDP). This is the new document that outlines the Council's regeneration plans.
			Para 12.7	Remove 'high jobs target and...' from 3 rd sentence.	This reflects the fact that the updated jobs target is lower than the previous target.
				Update technical figures.	To reflect latest study information.
		A low carbon economy	-	-	-
		The Maylands Business Park	-	-	-

		Supporting tourism	Para 12.16	Add reference to local tourism.	For clarity ad completeness.
		Economic Development	Policy CS14	Replace jobs growth target of 18,000 from 2006-2031 with jobs growth estimate of 10,000. Include statement that sufficient land will be allocated to accommodate this.	To reflect advice in the Dacorum Employment Land Update 2011 (Roger Tym & Partners).
			Monitoring of Policy CS14	Update indicators	For clarity and to ensure indicators are robust and measurable.
			Delivery of Policy CS14	Amend last delivery mechanism to make more general and include reference to the role of Place Strategies.	To allow for flexibility with use of LDO and reflect the role of the Place Strategies in helping ensure economic prosperity.
	13.	Providing for offices, industry, storage and distribution	-	-	-
		Offices	Para 13.5	Change office jobs forecast from 12,400 to 7,000 and update source accordingly.	To reflect advice in the Dacorum Employment Land Update 2011 (Roger Tym & Partners).
			Para 13.7	Remove reference to amount of office floorspace that will be provided in the Maylands Gateway. This also requires a consequential change to the Hemel Hempstead Place Strategy.	To allow for flexibility in the East Hemel Hempstead AAP.
			Para 13.8	Change wording to state that Masterplan will identify the most appropriate location for	Allow for flexibility. The Town Centre Masterplan will establish whether a single

				offices in Hemel Hempstead Town Centre, rather than identify an office quarter.	location or multiple locations for offices will be identified.	
			Para 13.8	Change wording in last sentence to remove reference to office quarter.		
			Para 13.9	Remove last sentence.	The principle is already covered by Policy CS15.	
		Industry, storage and distribution	Para 13.3	Revise job and floorspace forecast figures.	To reflect advice in the Dacorum Employment Land Update 2011 (Roger Tym & Partners).	
		Offices, Research, Industry, Storage and Distribution	Policy CS15	Revise floorspace targets for additional office and industry, storage and distribution floorspace.	To reflect advice in the Dacorum Employment Land Update 2011 (Roger Tym & Partners).	
			Delivery mechanisms		Remove reference to Hertfordshire Forward and Hertfordshire Works.	These organisations have or will shortly be subsumed by the Local Enterprise Partnership.
					Replace Hemel 2020 Vision with reference to Dacorum Development Programme (DDP).	In anticipation of the Council's plans to supersede the Hemel 2020 vision through the Dacorum Development Programme.
14.	Supporting retailing and commerce	Policy CS16		Amend retail capacity figures to reflect latest available information.	To reflect the results of the latest retail study update, carried out by GL Hearn (September 2011) with regard to retail capacity for the Borough and main towns. This more accurately reflects what is required within Dacorum, and thereby	

					alleviates concerns about the impact on town centres outside the district. The policy thrust remains unchanged.
		The retail hierarchy	-	-	-
		Shopping areas	-	-	-
		Out of centre retail development	Para 14.11	Amend criterion (d) to refer to 10 years.	To reflect latest Government guidance.
Providing Homes and Community Services	15.	Providing homes	General	Update references to housing options and make other consequential changes.	To reflect decisions on the housing target. These changes will need to be applied throughout the housing chapter and in other relevant sections of the plan.
			General	Update to refer to the latest technical work.	To reflect progress on the evidence base.
		Housing programme	Paras 15.10-15.23	Amend text in the light of decisions on the housing target; the approach to local allocations and latest household growth projections. Also amend to: <ul style="list-style-type: none"> clarify that the housing target should not be interpreted as an open ended figure. replace references to 'housing programme' with 'housing supply.' ensure Local Allocations and Strategic Sites are 	For clarity and to reflect decisions regarding the housing target and any local allocations and latest household projection and monitoring information.

				<p>referred to in the same way throughout.</p> <ul style="list-style-type: none"> • Delete the table setting out the anticipated level of affordable housing and percentage greenfield. Update this information and include % greenfield as a target under Policy CS17 and include reference to amount of affordable housing within section on Housing Mix. • Update figures for indicative distribution of housing supply in Place Strategies and inclusion of new table to illustrate these figures. 	
			Policy CS17	<ul style="list-style-type: none"> • Amend title of Policy to 'New Housing' • Insert reference to 'an average of 430 net additional dwelling...' • Delete cross reference to Policy CS2. • Insert housing trajectory at Appendix 2. 	To simplify the wording and refer to the selected target.

			Table 7	Amend Table 7 to better explain the individual components of housing supply and remove existing figures.	For simplify the explanation of housing supply and how this relates to the specified housing target. Figures have been removed to avoid the Core Strategy becoming dated. Annual Monitoring Reports will give the latest information on supply.
		Housing mix	Monitoring of Policy CS18.	Delete indicator relating to Lifetime Homes standard.	To reflect change to Policy CS29 and the fact that Lifetime Homes Standard (or equivalent!) is embedded within sustainability requirements.
			Paras. 15.24-15.26 and Table 9	<ul style="list-style-type: none"> Update reference to the SHMA in the light of the future work on a local needs housing survey and rolling forward the Council's Housing Strategy. Delete Table 9 relating to projected size mix of new homes. 	Following discussion with Group Manager Strategic Housing and the content of the forthcoming Affordable Housing Supplementary Planning Document and Local Housing Needs Survey.
			New paragraph	Insert new paragraph to refer explicitly to the accommodation needs of the elderly.	To ensure the plan acknowledges the needs of the ageing population and reflects the latest advice from Herts County Council.
		Affordable housing	Policy CS19	Amend policy to: <ul style="list-style-type: none"> refer to 'rent' rather than 'social rent' with regarding to tenure 	To : <ul style="list-style-type: none"> respond to advice from the Group Manager Strategic Housing and

				<ul style="list-style-type: none"> split requirements simplify criteria (a) and (b) and refer to the Council's housing strategy and other evidence. explain that 100% of homes on selected rural sites may be affordable and amend reference to Policy CS20 to reflect title change. 	<p>Development Management;</p> <ul style="list-style-type: none"> reflect amendments to PPS3 relating to the inclusion of a new category of 'affordable rent'; improve presentation and clarity of policies; and cross reference to the Planning Obligations SPD. <p>The policy approach remains unchanged.</p>
		Paras 15.30 -15.37	Update in the light of changes to Policy CS19 above.	For clarity and consistency.	
		Policy CS20	<ul style="list-style-type: none"> Amend title to 'Rural Sites for Affordable Homes.' Amend policy to refer to selected <u>small</u> villages and to clarify the policy relates to affordable homes. 	<ul style="list-style-type: none"> To reflect deletion of reference to 'Rural Exceptions' in new Draft NPPF. For clarity and consistency with existing policy approach. 	
		Travelling communities	Table 10	Delete columns specifying short and long term provision	To simplify the table. The split is not necessary to the policy.
16.	Meeting community needs	Para 16.5-16.7	Minor rewording.	For clarity.	
	Delivering community services	Para 16.9	Add reference to the role	To correct an omission and	

		and facilities		played by private schools within the Borough	recognise the role they play in providing school places.
		Delivering leisure and cultural facilities	Para 16.23	Delete specific reference to a performing arts venue.	To reflect changes to the Hemel Hempstead Place Strategy.
Looking after the Environment	17.	Enhancing the natural environment	General	Editing of text.	To better link landscape, green infrastructure and biodiversity issues together.
		Protecting and Improving the Landscape	Para 17. 5 and 17.6 Map 2	Editing and reference to commons. Additional information to better reflect the scarp and dip slope topography in Dacorum.	For clarity and to respond to changes resulting from 'Dacorum's Green Infrastructure Plan'. See below.
		Green Infrastructure	Paras 17.9 – 17.13	Editing and reference to key recommendations in 'Dacorum's Green Infrastructure Plan'.	To take account of new evidence - Dacorum's Green Infrastructure Plan – and ensure consistency of approach.
			Map 3	Include additional information and present the high level green infrastructure network as a diagram like Map 2.	
			Policy CS26	Revise policy, retaining the existing principles and incorporating recommendations, action and information from new technical work (Green Infrastructure Strategy).	
Delivery of Policies CS24-CS26.	Insert reference to technical notes produced by Chilterns Conservation Board.	For completeness.			

	Biodiversity and Geological Conservation	Paras 17.14 and 17.15	Editing and to recognise that geological sites may be added to the list.	For clarity and to ensure consistency of approach. Advice from the Hertfordshire Biological Records Centre indicates this is currently under investigation.
18.	Conserving the historic environment	Para 18.1	<ul style="list-style-type: none"> Delete reference to 'scheduled archaeological sites' and amend to 'areas of archaeological significance.' Include reference to landscape. 	To respond to advice from English Heritage and the Council's Conservation Officer.
		Paras 18.2-18.5	<p>Express the social and environmental benefits and the significance of historic heritage more positively.</p> <p>Emphasise the importance of high quality building design and maintenance.</p> <p>Include reference to the heritage at risk review and how the Council takes positive action to protect vulnerable heritage assets.</p>	To respond to advise from the Council's Conservation Officer.
		Policy CS27	Emphasise the need to conserve heritage assets and positively enhance conservation areas.	

	19.	Using resources efficiently	Para 19.6	Delete final two sentences.	To reflect changes to Council's Corporate Objectives.
			Para 19.11	Add additional text to explain the broad principles behind the energy hierarchy in Figure 16.	For clarity.
			Para 19.25	Delete reference to SPD and refer instead to "further guidance."	To allow greater flexibility with regard to the precise nature of future guidance and reflect change to wording of Policy CS30.
			Para 19.34	Insert additional wording to reflect how waste water and sewerage network upgrades will be progressed with adjoining authorities and stakeholders.	To give the most up-to-date position regarding discussions with the Water Cycle Study Steering Group regarding cross-boundary working.
		Renewable energy	Table 11	Amend and update requirements within Table relating to the level of carbon emission reductions in different areas of the borough and for different scales of development.	<p>The approach set out in Table 11 in the Draft Core Strategy has been tested and refined following development of the Council's online carbon monitoring system (C-Plan). The revised requirements follow the same principles as set out in the original table but have been amended for the following reasons:</p> <ul style="list-style-type: none"> To refer to the 2010 rather than 2006 Buildings Regulations as the benchmark

					<p>figure;</p> <ul style="list-style-type: none"> • Potential changes to Code for Sustainable Homes; • To reflect current Local Plan definitions relating to what constitutes large and small scale development; • To make requirements for small scale development less onerous and to focus efforts to achieve carbon emission reductions on larger scale developments to reflect viability considerations.
		Sustainable design and construction	Policy CS28	Delete first two paragraphs of policy and replace with requirement that new development will be expected to (a) deliver carbon emission reductions as set out in table 11; and (b) maximise the energy efficiency performance of the building fabric in accordance with the energy hierarchy set out in Figure 16.	To simplify and clarify the policy and reflect changes made to Table 11 and better link to Policies CS29 and CS30.

			Policy CS29	Amend criterion (g) to delete reference to the replacement of trees lost through development.	Criterion duplicates requirements of Policy CS12.
				Insert reference to carbon emissions reductions in Table 11 (which have changed) and to maximising the energy efficiency performance of buildings (in accordance with Figure 16, the energy hierarchy).	To reflect changes to table 11 for accuracy and achieve consistency between Policies CS28-30.
				Delete reference to Lifetime Homes	The principle of building adaptations is already included in the policy and Lifetime Homes are part of the sustainability statements, although the specific standards may change over time.
			Policy CS30	Add reference to the off-set funding being used for broader habitat improvements in criteria (c), water improvements and to public building stock. Revise title of policy to refer to its broader scope.	To extend the use of the off-set fund and reflect emerging national policy on biodiversity off-setting.
			Monitoring of Policies Cs28-CS30	Add "or equivalent" when referring to Code for Sustainable Homes.	To allow flexibility should these standards be superseded in the future.
	Sustainable resource management	Policy CS32	Add word 'Quality' to end of policy.	To more accurately reflect the content of the policy.	
		Delivery	Add reference to	To reflect Cabinet decision	

			mechanisms	development of action plans for AQMAs	(26/7/11) regarding AQMAs.
			Para 19.38	Add new text to supporting text to refer to the planned designation of AQMAs within the Borough, where they are located and the fact that Actions Plans for each will be developed.	To reflect Cabinet decision (26/7/11) regarding AQMAs.
Place Strategies	20.	Introduction	New para	Insert new text to refer to neighbourhood plans and village/parish plans.	To ensure that these types of plan, which may be prepared, are seen in the context of place strategies.
			Para 20.7	Update wording.	To reflect the changes made to Section 15 – Providing Homes and decision on the housing target.
	21.	Hemel Hempstead	Context	Update.	To provide the most up-to-date information and for clarity.
			Vision	Update and make stronger reference to open space and public transport. Refer to Spencers Park, East Hemel Hempstead	To provide a fuller, more rounded vision.
			Local Objectives	<ul style="list-style-type: none"> • Re-present, noting that a cemetery would serve the whole town. • Delete reference to extensions on the east of the town in St Albans. 	<ul style="list-style-type: none"> • For clarity. • To reflect St Albans District Council's decision not to consider this option.
			Delivering the Vision: Town	Amplify the strategy to better reflect the role of areas other	To provide a fuller, more rounded strategy.

				than the town centre and East Hemel, to emphasise the importance of neighbourhood open space and green infrastructure and to extend the reference to transport.	
			Delivering the Vision: Town Centre	Refer to the arts centre and historic character attracting new uses and investment into the Old Town	To identify an opportunity for future improvements
			Figure 17	Amend text of Gade, Hospital, Original Marlowes, Marlowes Shopping and Jellicoe Water Gardens Zones to widen the range of uses possible within each zone. In particular, delete references to office hubs: replace with business (Hospital Zone), commercial and business (Original Marlowes Zone) and office uses (Marlowes Shopping Zone). Indicate Jellicoe Water Gardens as a possible location for civic uses.	To ensure opportunities for future improvements and give greater flexibility in developing the town centre master plan.
			Delivering the Vision: East Hemel	Explain the reduced scale of development, the emphasis on regeneration and the facilities which are most likely to require location in St Albans district.	To reflect discussions with St Albans District Council and their intention to restrict the impact of development on Green belt in their district.

				Amend the office floorspace potential.	To reflect recent technical advice.
				Provide additional advice regarding open space to be retained or replaced in the Maylands Gateway area.	To provide guidance on the whole Gateway area.
				Explain what bulky B-class uses are (in the Engine Room).	For clarity.
			Policy CS33	<ul style="list-style-type: none"> • Take account of further work on the town centre, including the Town Centre Charette. Refer to new homes, an evening economy along Waterhouse Street, better east west links and restoration of the Water Gardens. • Amend reference to 'office hub' to refer to 'offices' 	For accuracy and clarity, and to reflect the Council's latest thinking and work arising from Town Centre Masterplan.
			Policy CS34	Refer to open land providing a setting in Maylands Gateway.	To provide consistent advice on the Gateway area.
			Monitoring	Simplify the list of business partners and refer to transport providers.	Update for accuracy.
			Vision Diagrams	<ul style="list-style-type: none"> • Adjust boundaries of zones to ensure consistency throughout. • Extend the Marlowes 	To reflect more recent evidence and Council thinking, and for accuracy.

				<p>Shopping Zone.</p> <ul style="list-style-type: none"> • Extend the Maylands Gateway area. • Amend the boundary of the Action Area Plan to suggest its extent in / overlap with St Albans District. • Amend urban design zones to reflect proposed or actual development at Nash Mills (semi-urban) and the manor Estate (semi-urban / peripheral). 	
22.	Berkhamsted	Para 22.1	Add reference to the town's rich archaeological heritage.	To respond to advice from English Heritage.	
		Para 22.11	Amend strategy to refer to links being fostered between British Film Institute and the town.	To make better use of this significant organisation, in return for supporting the consolidation of its operation on its site.	
		Para 22.5	Amend text to refer more generally to the need to apply planning policy sensibly when responding to applications for school improvements and expansion.	To give greater flexibility when considering individual applications and to respond to local needs.	

			Para 22.13	<p>Confirm the conclusion of the local highway authority that the highway issue at New Road / High Street, Northchurch will be resolved through the Berkhamsted Urban Transport Plan.</p> <p>More explicitly acknowledge traffic and pollution issues in the High Street / New Road, Northchurch area and the fact that improvements will be implemented as funding opportunities arise.</p>	<p>To update the position and confirm the removal of the New Road link from the strategy.</p> <p>To respond to local highway safety and air quality issues in this area.</p>
			Vision diagram	Amend diagram to insert additional 'peripheral zone' to Dudswell / western tip of Northchurch (currently 'semi-urban zone').	To reflect update to the Urban Design Assessments.
23.	Tring		Local Objectives	<ul style="list-style-type: none"> Amend the housing level sought (by +10), with knock-on effects to capacity references in the strategy. Note that Tring School might be extended "up to" two forms of entry. Change also required to reference in strategy itself. 	<ul style="list-style-type: none"> To reflect more recent monitoring information and overview of the housing distribution. To reflect this possibility more flexibly. For clarity and to reflect Council decision on the housing target.

				<ul style="list-style-type: none"> Amend second objective to refer to “development of the local allocation” rather than the “greenfield site”. 	
		Para 23.7		Note that the three General Employment Areas are to be retained.	For clarity.
		Proposal LA6		Renumber Proposal LA5.	To reflect deletion of Proposal LA5 – Land at Lock Field, New Road, Northchurch.
24.	Kings Langley	Para 24.6		Refer to Three Rivers District Council’s plans to reduce the amount of employment land in their district.	To acknowledge that Council’s intention through their Core Strategy.
25.	Bovingdon	Local Objectives		<ul style="list-style-type: none"> Amend the housing level sought (by -20), with knock-on effects to capacity references in the strategy. Amend second objective to refer to “development of the local allocation” rather than the “greenfield site”. 	<ul style="list-style-type: none"> To reflect more recent monitoring information and overview of the housing distribution. For clarity and to reflect Council decision on the housing target.
		Proposal LA7		Renumber as proposal LA6.	To reflect deletion of Proposal LA5 – Land at Lock Field, New Road, Northchurch.
26.	Markyate	Local Objectives		Amend the housing level	To reflect more recent

				sought (by +10), with knock-on effects to capacity references in the strategy.	monitoring information and overview of the housing distribution, including the slight increase in site area for Strategic Site SS2.
			Proposal SS2	Amend site area and housing capacity.	To take account of the availability of a small area of additional land.
	27.	Countryside	Local Objectives	Amend the housing level sought (by +20), with knock-on effects to capacity references in the strategy.	To reflect more recent monitoring information and overview of the housing distribution.
			Para 27.9	Delete reference to the Chilterns LEADER project and refer more generally to “incentives schemes or grant aid.”	To broaden scope of reference and prevent text becoming dated.
			Para 27.15	Delete specific reference to the Landowners Pack produced by the Conservation Board and refer more generally to advice provided by the organisation.	To broaden scope of reference and prevent text becoming dated.
		All Place Strategies	Vision Diagrams	Include wildlife corridors on vision diagrams for the settlement (with strategic wildlife corridors and key countryside corridors on Map 3)	To reflect evidence in the Urban Nature Conservation Study and show green infrastructure at local and strategic level. In addition, to link with changes to Policy CS26.

			Visions	Amend tense.	For consistency with Borough-wide vision and to clarify that the visions express what a place <i>will</i> be like by the end of the plan period, rather than what it is necessarily like at present.	
PART C – IMPLEMENTATION AND DELIVERY						
	28.	Delivery	-	-	-	
		Partnership working	-	-	-	
		Key projects	-	-	-	
		Flexibility and contingency	-	-	-	
	29.	Infrastructure requirements	Para 29.3		Amend to clarify that the IDP is the result of technical work, rather than being the technical work itself.	For clarity.
			Paras 29.4-5		Editorial amendments.	For clarity.
			Para 29.6		Add reference to the fact that most strategic and local infrastructure requirements are set out in IDP. Also, add in sentence to acknowledge role of neighbourhood plans with regards to infrastructure requirements.	For clarity and to update the chapter in light of emerging government guidance re neighbourhood planning.
		Developer contributions	Para 29.7	Add sentence to acknowledge that contributions will be used to mitigate the impacts of development.	Clarify that contributions are not sought to remedy existing deficits.	
			Para 29.8	Replace 'tariff or other measures' with CIL. Remove reference to pooled contributions and clarify how	Clarify the Council's approach to collecting developer contributions in light of the Coalition	

				CIL and S106 will be used.	governments' announcements regarding their intentions for CIL and S106.
			Para 29.9-10	Replace paragraphs with one which refers to CIL rather than the Planning Obligations SPD.	Allow for flexibility re. the Planning Obligations SPD and confirm commitment to CIL.
			Para 29.11	Amend to introduce flexibility about how the Council will respond where viability is a concern.	Partly because the amount of CIL payable will not be variable, and partly to introduce flexibility into the Council's approach to dealing with viability.
			Policy CS35	Delete last two paragraphs,. Insert reference to how financial contributions will be used.	To reflect changes in Government policy and the intended introduction of a Community Infrastructure Levy. Detailed reference to the Infrastructure Delivery Plan is more appropriate in the supporting text, apart from its use to guide expenditure of financial contributions.
			Delivery mechanisms for Policy CS35	Insert reference to CIL charge.	To reflect Council decision to progress work on developing a Community Infrastructure Levy.
	30.	Monitoring	-	-	-
PART D – APPENDICES					
		Appendix 1	Schedule of Superseded Policies	Update	To reflect changes made to policy titles
		Appendix 2	Housing trajectory	Insert once decision on	Trajectory information is

				housing target is made	required at the Pre-Submission stage.
		Appendix 3	Delivery mechanisms	Update as a consequence of changes to the main document.	For consistency and completeness.
		Appendix 4	Glossary	<p>Include new terms as appropriate. Including definitions of:</p> <ul style="list-style-type: none"> • Affordable housing • Neighbourhood Plans • Neighbourhoods • Extra care housing (Flexicare) • Green Enterprise 	Updating and clarity.

